



## Division of Land / Environmental Review

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



# ***FINAL ENVIRONMENTAL IMPACT REPORT***

*PALMS–MAR VISTA–DEL REY COMMUNITY PLAN AREA*

## ***Villa Marina Mixed Use Project***

***ENV-2004-3812-EIR***

***State Clearinghouse No. 2004081198***

***Council District 11***

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

**Project Address:** 13480, 13490 Maxella Avenue; 4350, 4356, 4358 Lincoln Boulevard,  
Los Angeles, CA 90292

**Project Description:** General Plan Amendment (from Limited Commercial to General Commercial for the Mixed Use Project site and Add Areas), Zone Change (Mixed Use Project area from M1 to RAS4 and Add Areas from M1 to C4), Tentative Tract Map, Conditional Use Permit, Coastal Development Permit, Site Plan Review, and Lot Line Adjustment. The proposed Project consists of the following two components: (1) a mixed use residential and retail development; and (2) a Community Plan Amendment and Zone Change, initiated by the City of Los Angeles, for two parcels located adjacent to the mixed use development (“Add Areas”). The proposed Mixed Use Project site comprises 4.04 acres, and the Add Areas comprise 5.28 acres (total project area is 9.32 acres). Subsequent to the close of the Draft EIR public review period, the mixed use component of the project has been revised to include a reduction in the number of residential units proposed. The Revised Mixed Use Project consists of 244 residential condominium units, 9,000 square feet of retail uses, and 594 parking spaces. Five commercial and restaurant buildings totaling 30,000 square feet will be demolished. Activities involving the Add Areas are limited to the proposed Community Plan Amendment and Zone Change with no physical development occurring within these two Add Areas.

**APPLICANT:**

The Olson Company

**PREPARED BY:**

Environmental Review Section  
Los Angeles City Planning Department

**March 2005**

**RECOMMENDATION FOR EIR CERTIFICATION**

**FEIR FILE NO.:** ENV-2004-3812-EIR

**STATE CLEARINGHOUSE NO.:** 2004081198

**PROJECT NAME:** Villa Marina

**PROJECT LOCATION/ADDRESS:** 13480, 13490 Maxella Ave; 4350, 4356, 4358 Lincoln Blvd.

**PLANNING AREA:** Palms - Mar Vista - Del Rey

**COUNCIL DISTRICT:** 11

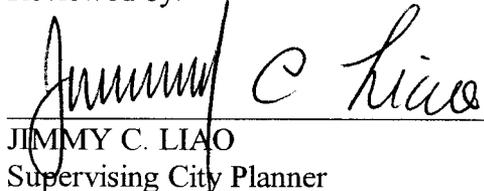
Pursuant to the California Code of Regulations, Title 14, Section 15090, this EIR has been completed in compliance with the California Environmental Quality Act (CEQA Guidelines, Article 7, Section 15090). The Environmental Review Section has determined that the Draft EIR and Final EIR is adequate for review by the decision-making body for the proposed project. The decision-making body must certify that it has considered the information contained in the Environmental Impact Report prior to making a final determination.

Approved by:



SUE CHANG  
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Reviewed by:



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Submitted and Reviewed by:



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## I. EXECUTIVE SUMMARY

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### 1. INTRODUCTION

In accordance with Sections 15088, 15089, and 15132 of the State Guidelines for the Implementation of the California Environmental Quality Act (the “CEQA Guidelines”), the City of Los Angeles Planning Department, as Lead Agency, has prepared this Final Environmental Impact Report (the “Final EIR”) for the Villa Marina Mixed-Use Project (the “Project”).

This Final EIR comprises the second and final part of the Environmental Impact Report (EIR) for the Project. The Villa Marina Mixed-Use Project Draft EIR, which was previously circulated for public review and comment, comprises the first part, and is available for review at the Department of City Planning, Environmental Review Section, 200 North Spring Street, Room 761, Los Angeles, CA 90012.

This Final EIR consists of the following five chapters:

- I. **Executive Summary.** This chapter describes the purpose of the EIR; the organization of the Final EIR; a description of the Project, including the requested discretionary actions; the public review process; areas of controversy and issues to be resolved; a summary of the alternatives to the Project as presented in the Draft EIR; and a summary of the Project’s environmental impacts and mitigation measures.
- II. **Environmental Analysis of the Reduced Project.** The Applicant following the close of the Draft EIR public review period voluntarily decreased the proposed number of residential units to be developed. This chapter describes the Project as currently proposed and comparatively evaluates the environmental impacts of the currently proposed Project with the Project as analyzed in the Draft EIR. A comparative analysis is provided for each issue addressed within Section IV, Environmental Impact Analysis, of the Draft EIR.
- III. **Mitigation Monitoring and Reporting Program (MMRP).** The MMRP presented in this chapter is an updated version of that presented in the Draft EIR taking into account all changes and/or additions resulting from the Draft EIR comments provided by the public. The MMRP is the document that is used by the enforcement and monitoring agencies responsible for the implementation of the Proposed Project’s mitigation measures. Mitigation measures are listed by

environmental topic. Additional mitigation measures that have been incorporated into the Final EIR as well as the Proposed Project's Initial Study (see Appendix A of the Draft EIR) are included in the MMRP.

- IV. **Corrections and Additions.** This chapter provides a list of changes that were made to the Draft EIR, based on comments received from the public.
- V. **Comments and Responses.** This chapter presents all comments received by the City during the Draft EIR 45-day public review period as well as the responses to those comments.

## 2. PROPOSED PROJECT

### a. Project Location

The Project Site is located in the Palms–Mar Vista–Del Rey Community of the City of Los Angeles. Located on the western edge of the Community Plan area, the Project Site is bounded by Lincoln Boulevard (State Route 1/Pacific Coast Highway) to the west, the Marina Freeway (State Route 90) to the south, and Maxella Avenue to the north.

The proposed Project consists of two components. The first component is a mixed use residential and retail project (the “Mixed Use Project”). The second component is a Community Plan Amendment and Zone Change, initiated by the City of Los Angeles, for two parcels located adjacent to the Mixed Use Project (the “Add Areas”). The purpose of the second component is to create land use designations that are consistent with existing uses on and around the site of the Mixed Use Project. The land areas that comprise the Mixed Use Project and the Add Areas are collectively referred to as the “Project Site.” The Project Site consists of a total of 9.32 acres. The site that is proposed for the Mixed Use Project is 4.04 acres in size, while the two Add Areas comprise a total of 5.28 acres (i.e., 4.76 acres and 0.52 acre in size, respectively). The site for the Mixed Use Project is bounded on the east by the portion of the Villa Marina shopping center that is not proposed for development.

The site of the Mixed Use Project currently contains five individual structures. Two of these structures front Maxella Avenue and consist of a restaurant and a vacant building, which was last occupied by a restaurant. The remaining buildings front Lincoln Boulevard and include a business providing copying and related services, a sit-down restaurant, and a fast-food restaurant. The existing structures within the site of the Mixed Use Project consist of 30,000 square feet of retail and restaurant floor area. Two structures, the Marriott Hotel and a Union 76 Gas Station, currently occupy the two parcels that comprise the Add Areas. The Add

Areas are located northwest (i.e., gas station) and south (i.e., Marriott Hotel) of the Mixed Use Project.

## **b. Project Characteristics**

### **1. Mixed Use Project**

Development of the Mixed Use Project, as proposed and analyzed in the Draft EIR, consisted of the development of 310 condominium units and 9,000 square feet of commercial floor area. The Applicant, following the close of the public review period for the Draft EIR, has proposed a reduction in the number of residential units proposed for development (“Revised Mixed Use Project”). Specifically, the Applicant has reduced the number of proposed residential units from 310 to 244, a 21 percent reduction in the amount of proposed residential development. The amount of proposed commercial floor area is unchanged from that analyzed in the Draft EIR. As such, the Revised Mixed Use Project consists of 244 residential condominium units, 10 percent of which would be available as affordable housing, and 9,000 square feet of commercial floor area. The 244 residential condominium units would be developed as a planned, landscaped residential community with a proposed mix of 20 one-bedroom, 151 two-bedroom, and 73 three-bedroom units. The analysis presented in Section II of this Final EIR concludes that the Revised Mixed Use Project is a refinement of what was analyzed in the Draft EIR and that the proposed reduction in the number of residential units does not result in any new significant impacts nor any substantial increases in the severity of a significant impact that was identified in the Draft EIR. Thus, under CEQA Guidelines Section 15088.5 recirculation is not required.

As part of the Mixed Use Project, residents would be provided with a number of amenities, including, but not limited to, a community meeting room, a swimming pool and/or spa, and an exercise room. Additionally, the Mixed Use Project’s commercial component would be developed in two locations along Maxella Avenue, consisting of 6,000 and 3,000 square feet, respectively. These retail areas are anticipated to be occupied by businesses such as a florist, café, and/or copying services, or similar businesses.

The Mixed Use Project would have frontages on both Maxella Avenue and Lincoln Boulevard. Building heights, as analyzed in the Draft EIR, were proposed to be approximately 45 to 70 feet, with a varying roofline that would articulate by as much as 25 feet. Building heights under the Revised Mixed Use Project would be 67 feet in height along the Maxella Avenue frontage and 55 feet in height along the Lincoln Boulevard and Marina Freeway frontages. The currently proposed building heights along the Lincoln Boulevard and Marina Freeway frontages are lower than what was previously proposed and analyzed in the Draft EIR. The Mixed Use Project’s Maxella Avenue frontage would be developed with retail uses at the ground or street level, with four stories of residential units located above the retail uses. Signage

for the Mixed Use Project would extend along both Maxella Avenue and Lincoln Boulevard. Parking for the residents and their guests as well as patrons and employees would be developed in a mix of one-level subterranean, second-level podium, and surface-level spaces, with a total capacity of up to 594 vehicles. Of these, 549 spaces would be reserved for the Mixed Use Project's residents with the remaining 45 spaces set aside for the Mixed Use Project's retail uses.

Access to the site of the Mixed Use Project would be provided via a new driveway along Maxella Avenue. The Applicant is also requesting a Lot Line Adjustment that would relocate the access driveway for the Marriott Hotel from its current location to the eastern border of the site of the Mixed Use Project. The Applicant would maintain its existing easement rights, thereby allowing unrestricted use of the new hotel access driveway. Residents and their guests would have access from this driveway into "resident only" parking via garage gates with an electronic permission feature.

## **2. Add Areas**

Activities occurring within the two Add Areas are limited to a City initiated Community Plan Amendment and Zone Change. No physical changes are proposed for either of the two Add Areas. However, a Lot Line Adjustment is proposed in order to relocate the existing Marriott Hotel access driveway to the eastern border of the Project Site, east of the Mixed Use Project. The Add Areas are included as part of the Project to establish a consistent pattern of land use designations within the Project area at the City's request.

### **c. Discretionary Actions Requested and Permits Required**

The City of Los Angeles Palms–Mar Vista–Del Rey Community Plan governs development of the Project Site. Actions to implement the proposed Project would include, but may not be limited to, the following:

- Community Plan Land Use designation amendment from Limited Manufacturing to Commercial Manufacturing for the entire Project Site (i.e., the sites of the Mixed Use Project and Add Areas);
- Zone Change from Limited Industrial to Residential/Accessory Service 4 for the site of the Mixed Use Project;
- Zone Change from Limited Industrial to Commercial (C4) for the Add Areas;
- Lot Line Adjustment between the site of the Mixed Use Project and the Add Area occupied by the Marriott Hotel;

- Parcel Subdivision Approval for the Mixed Use Project;
- Coastal Development Permit for the Mixed Use Project;
- Site Plan Review Approval for the Mixed Use Project;
- Demolition, grading, foundation, and building permits for the Mixed Use Project;
- Haul route(s) approval, as necessary for the Mixed Use Project; and
- Any additional actions as may be determined necessary.

### **3. PUBLIC REVIEW PROCESS**

The City of Los Angeles circulated a Notice of Preparation (NOP) for a 30-day review period, beginning September 2, 2004, and ending October 1, 2004. In addition, a public scoping meeting was conducted on September 14, 2004. The NOP and letters and comments received during the comment period, as well as comment sheets from the public scoping meeting, are included in Appendix A of the Draft EIR. At the time the NOP was circulated, as well as when the public scoping meeting was held the Add Areas and the proposed Lot Line Adjustment were not included as part of the Project.

CEQA requires that the Draft EIR be circulated for public review.<sup>1</sup> The Draft EIR was circulated for a 45-day review period starting on November 4, 2004 and ending on December 20, 2004. The public review period was extended to January 6, 2005 for the City of Culver City. Following the close of the public review period, written responses were prepared on all comments received and these comments and responses are incorporated into this Final EIR. (See Section V, Responses to Written Comments.) No final actions (approval or denial of the proposed Project) will be taken until this Final EIR has been reviewed, certified as complete, and considered by the appropriate decision-makers. Dates of meetings when the Project is scheduled to be considered by the City's decision makers will be published and officially noticed in accordance with all City requirements.

### **4. AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED**

Potential areas of controversy and issues to be resolved include issues known to be of concern to the community and issues raised in the response to the NOP and the Draft EIR. Concerns raised in response to the NOP suggested that the EIR should include analyses of the issues identified in the Project's Initial Study. The more notable concerns raised, relative to the

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

NOP, as well as the Draft EIR, include traffic and parking impacts and potential cumulative impacts.

## **5. SUMMARY OF ALTERNATIVES**

Five alternatives to the proposed Project were developed and analyzed in the Draft EIR in order to compare the impacts of a range of alternatives to the Project that was analyzed in the Draft EIR. It is the purpose of the alternatives analysis to determine if another use, density, or location would reduce the Project's significant environmental impacts to less than significant levels. The analysis of alternatives that was presented in the Draft EIR began with the "No Project" Alternative. CEQA Guidelines Section 15126.6(e)(3) sets forth two options for discussing the No Project Alternative. The two options are to define the No Project Alternative in terms of no changes to existing on-site conditions ("no build"), or development of the site under existing land use regulations without approval of the proposed Project. The first alternative (Alternative 1) analyzed in the Draft EIR reflects the one in which no development would occur. The second and third alternatives (Alternatives 2 and 3) are reduced density alternatives. Alternative 2 is defined as a 30 percent reduction in all proposed land uses, while Alternative 3 includes more residential units and less retail floor area than what is assumed under Alternative 2. The remaining alternatives include changing the design of the Project (i.e., design alternative), and developing the Project at an alternative site. Based on comparative evaluations, estimations are made as to the environmental impacts of each alternative in contrast to those of the proposed Project and whether each alternative could reduce or eliminate the Project's potentially significant impacts while attaining the Applicant's basic objectives. A summary of the five alternatives and the conclusions reached in the Draft EIR regarding their comparative impacts after mitigation and their relationship to the Project objectives is provided as follows.

### **Alternative 1: No Project—No Development**

#### **Summary of Comparative Impacts**

The No Project Alternative assumed that the proposed Project would not be developed and the existing retail, restaurant, and parking land uses within the site of the Mixed Use Project and the existing Marriott Hotel and gas station (Add Areas) would remain unchanged. Existing facilities would continue to be used, as under existing conditions or former conditions. As such, the No Project Alternative within the site of the Mixed Use Project would continue to contain a total of approximately 30,000 square feet of development. Of this total, two sit-down restaurants account for 12,080 square feet, as well as a 2,558-square-foot fast-food restaurant and a 6,400-square-foot retail store specializing in copying and related services. The remaining square footage, 8,967 square feet, is located within a vacant commercial building located towards the eastern portion of the site of the Mixed Use Project.

The No Project Alternative would eliminate the proposed Project's view obstruction impacts; significant construction air quality and noise impacts; and significant traffic impacts at the intersection of Maxella Avenue and Lincoln Boulevard.

### **Relationship of Alternative 1 to the Project Objectives**

The No Project Alternative would not meet the objective of developing the site of the Mixed Use Project in a manner that would replace older commercial uses and surface parking facilities with a new mixed commercial and residential development that would have impacts, as well as benefits, relative to the issues analyzed in the Draft EIR. The No Project Alternative would not realize the benefits of the Mixed Use Project with regard to improving intersection operations at the Glencoe Avenue and Washington Boulevard intersection, as well as implementing a number of important Community Plan and air quality policies and objectives. In addition, the existing Community Plan and zoning designations applicable to the site of the Mixed Use Project and the Add Areas would not be replaced with designations that are consistent with the existing land uses on and around the Project Site. As the No Project Alternative would not implement the City's long-range land use goals and the basic objectives for the Mixed Use Project, it would not serve as a feasible development alternative.

### **Alternative 2: Reduced Project "A" Alternative**

#### **Summary of Comparative Impacts**

Under Alternative 2, all components of the proposed Mixed Use Project as analyzed in the Draft EIR would be incrementally reduced by 30 percent, including building height, residential units, retail floor area, and parking spaces. Alternative 2 also includes the same Community Plan Amendment and Zone Change for the Add Areas as the proposed Project. Based on this description and the Project as analyzed in the Draft EIR, the Reduced Project "A" Alternative, within the area proposed for the Mixed Use Project, would contain 217 condominium units, 6,300 square feet of retail uses, and 484 parking spaces. A total of 10 percent of all units within the proposed Mixed Use Project would be available as affordable housing. In comparison to the revised Project, this alternative represents an 11 percent reduction in residential development and a 30 percent reduction in commercial development. All of the amenities proposed as part of the proposed Mixed Use Project would be developed under the Reduced Project "A" Alternative. The Floor Area Ratio (FAR) for the Mixed Use Project under Alternative 2 would be approximately 1.59,<sup>2</sup> approximately 0.33 less than for the Revised Mixed Use Project. The Mixed Use Project component of Alternative 2 would provide 484 parking spaces, 10 fewer parking spaces than under the proposed Mixed Use Project. Maximum building

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<sup>2</sup> FAR is the ratio of square feet of floor area/square feet of land area.

heights within the Mixed Use Project would be approximately 31 to 49 feet, with varying rooflines that would articulate by as much as 18 feet. Commercial uses within the Mixed Use Project would occur in a ground floor setting that would front Maxella Avenue with signage that would extend along both Maxella Avenue and Lincoln Boulevard.

Alternative 2, with a reduced amount of development for the Mixed Use Project, would reduce some of the Mixed Use Project's impacts but, at the same time, would implement land use and air quality policies to a lesser extent than the Revised Mixed Use Project. Of particular note is that Alternative 2 eliminates the one significant traffic impact attributable to the project, as analyzed in the Draft EIR, at the Maxella Avenue and Lincoln Boulevard intersection. In addition, view obstruction and operational air quality emissions attributable to the Mixed Use Project would be reduced under Alternative 2. Alternative 2 would result in similar impacts to those of the revised Project on land use compatibility, visual qualities, parking, construction air quality emissions, and noise.

### **Relationship of Alternative 2 to the Project Objectives**

Alternative 2 would meet, although to a lesser degree, the Revised Mixed Use Project's objective of providing new housing units to help meet the demand for market and affordable housing on Los Angeles' Westside. It would also meet the proposed Mixed Use Project's objectives, although to a lesser degree, of providing residential and commercial spaces in an urban context that encourages pedestrian oriented and non-motorized transportation, recreational, and shopping opportunities; and locating mixed use projects along designated transit corridors and in appropriate commercial centers. Furthermore, Alternative 2 would meet the Mixed Use Project's objective of promoting greater individual choice in type, quality, price, and location of housing. Alternative 2, as is the case with the revised Project, would also establish Community Plan and Zoning designations that are consistent with existing uses on and around the Project Site. In conclusion, while Alternative 2 would achieve many of the objectives of the revised Project, the reduction in development for the Mixed Use Project, particularly market and affordable housing units, results in Alternative 2 achieving the Mixed Use Project's objectives to a lesser degree than the revised Project.

### **Alternative 3: Reduced Project "B"**

#### **Summary of Comparative Impacts**

Under Alternative 3, the site of the Mixed Use Project would be developed with the same components and layout of the proposed Project, except the number of residential condominium units would be reduced from that analyzed in the Draft EIR (310 units) to 275 units (11 percent reduction) and the amount of retail square footage would be reduced from 9,000 square feet to 5,500 square feet (39 percent reduction). A total of 576 parking spaces within the area proposed

for the Mixed Use Project would be provided under the Reduced Project “B” Alternative. The Floor Area Ratio (FAR) for the area proposed for the Mixed Use Project under Alternative 3 would be 2.00, approximately 0.27 less than under the Project as analyzed in the Draft EIR, but approximately 0.08 more than the revised Project. Within the area proposed for the Mixed Use Project, Alternative 3 would also provide 115 fewer parking spaces than under the proposed Project, as analyzed in the Draft EIR. Maximum building heights would be the same as the revised Project (i.e., approximately 45 to 70 feet, with varying rooflines that would articulate by as much as 25 feet). Commercial uses within the area of the Mixed Use Project under Alternative 3 would occur in a ground floor setting that would front Maxella Avenue with signage that would extend along both Maxella Avenue and Lincoln Boulevard. Alternative 3 also includes the same Community Plan Amendment and Zone change for the Add Areas as is proposed to occur under the proposed Project.

Alternative 3, with a reduced amount of development relative to the Project as analyzed in the Draft EIR, would reduce some of the impacts of the Mixed Use Project, but, at the same time, would implement land use and air quality policies to a lesser extent than the Project as analyzed in the Draft EIR. Of particular note is that the Mixed Use Project under Alternative 3 eliminates the one significant traffic impact attributable to the Project, as analyzed in the Draft EIR, at the Maxella Avenue and Lincoln Boulevard intersection. In addition, view obstruction and operational air quality emissions would be reduced for the Mixed Use Project under Alternative 3 from that analyzed in the Draft EIR. Furthermore, the Mixed Use Project under Alternative 3 would result in similar impacts to those of the revised Project on land use compatibility, visual qualities, parking, construction air quality emissions, and noise.

### **Relationship of Alternative 3 to the Project Objectives**

The Mixed Use Project under Alternative 3, when compared to the Project analyzed in the Draft EIR, would meet, although to a lesser degree, the proposed Project’s objective of providing new housing units to help meet the demand for market and affordable housing on Los Angeles’ Westside. Alternative 3 would also meet the proposed Project’s objectives, although to a lesser degree, of providing commercial spaces in an urban context that encourages pedestrian oriented and non-motorized transportation, and shopping opportunities; and locating mixed use projects along designated transit corridors and in appropriate commercial centers. The Mixed Use Project under Alternative 3 would also meet the objective of promoting greater individual choice in type, quality, price, and location of housing. In conclusion, while Alternative 3 would achieve many of the objectives of the revised Project, the reduction in development results in Alternative 3 achieving the Project’s objectives to a lesser degree than the proposed Project.

## **Alternative 4: Alternate Design**

Under Alternative 4 the amount of development within the area of the Mixed Use Project would be the same as the revised Project. As such, a total of 244 condominium units, 9,000 square feet of retail uses, and 594 parking spaces would be developed. A total of 10 percent of all units would be available as affordable housing. All of the amenities proposed as part of the Revised Mixed Use Project would be developed under the Alternate Design Alternative. Where this Alternative differs from the Revised Mixed Use Project is that the residential units under this Alternative would be developed in a single structure that would be 12 stories in height. The residential tower would be centered on the portion of the Project Site within which the Mixed Use Project is proposed to occur. The retail uses would be located along Maxella Avenue, as is the case with the proposed Project. Parking would be provided via surface parking. Signage under this Alternative, as is the case with the proposed Project, would extend along both Maxella Avenue and Lincoln Boulevard. Alternative 4 also includes the same Community Plan Amendment and Zone change for the Add Areas as is proposed to occur under the proposed Project.

As the Mixed Use Project under Alternative 4 proposes the same amount and types of development as the proposed Mixed Use Project, nearly all of the impacts of Alternative 4 are the same or similar to the proposed Project. The exception pertains to view impacts attributable to the Mixed Use Project which are greater under Alternative 5 due to the height of the 12-story residential tower.

### **Relationship of Alternative 4 to the Project Objectives**

The Mixed Use Project under Alternative 4 would meet the proposed Project's objective of providing new housing units to help meet the demand for market and affordable housing on Los Angeles' Westside. The Mixed Use Project would also meet the proposed Project's objectives of providing residential and commercial spaces in an urban context that encourages pedestrian-oriented and non-motorized transportation, recreational, and shopping opportunities, and locating mixed use projects along designated transit corridors and in appropriate commercial centers. The Mixed Use Project under Alternative 4 would also meet the objective of promoting greater individual choice in type, quality, price, and location of housing.

## **Alternative 5: Alternative Location**

### **Summary of Comparative Impacts**

Alternative 5 assumes that the proposed Project would not be developed at the proposed Project Site and would be moved to another location. Since the Add Areas are included solely for the purpose of establishing consistency across Community Plan and Zoning designations at

the Project Site, the inclusion of this Project component within the Alternative Site Alternative is not required. As such, the Alternative Location Alternative only considers the relocation of the Revised Mixed Use Project. Therefore, under this Alternative, the Mixed Use Project would be constructed according to its revised design and intensity, with the same floor area and mix of uses, including 244 residential condominium units, 9,000 square feet of retail uses, and 594 parking spaces. The selection of an alternative site for the Mixed Use Project was based on a number of factors, such as locating a site that could accommodate the proposed land uses, would serve the same market as the Project, and is located in an area served by transit and existing infrastructure systems.

The alternative site is 2.3 acres in size and is located north of the proposed Project Site at Beach Avenue between Del Rey Avenue and Glencoe Avenue. The addresses that define the alternative site are as follows: 4040 Del Rey Avenue, 4051 Glencoe Avenue, and 13440–13454 Beach Avenue.

As Alternative 5 proposes the same amount and types of development as the Revised Mixed Use Project, most of the impacts of Alternative 5 are the same or similar to the proposed Project. However, the exceptions are notable, particularly more significant intersection impacts under Alternative 5 than the proposed Project. Furthermore, Alternative 5 would generate greater, but less than significant, visual qualities impacts due to the greater building heights that occur under Alternative 5 because of its reduced size, relative to the portion of the Project site within the Revised Mixed Use Project would be developed.

### **Relationship of Alternative 5 to the Project Objectives**

Alternative 5 would meet the proposed Project’s objectives, except for the basic objective of developing the portion of the proposed Project Site within which the Mixed Use Project would occur in a manner that would replace older commercial uses and surface parking facilities with economically viable uses that meet the local demand for market rate and affordable housing units.

### **Environmentally Superior Alternative**

Based on an analysis of Alternatives 1 through 5, an environmentally superior alternative has been identified. The No Project Alternative (Alternative 1) would be the environmentally superior alternative, as this alternative would have fewer impacts across the environmental issues analyzed in the Draft EIR. However, CEQA requires that when the No Project Alternative is the environmentally superior alternative, another alternative needs to be selected as environmentally superior. In accordance with this procedure, Alternative 2 (Reduced Project Alternative “A”) would be the environmentally superior alternative. This Alternative was selected because nearly all Project impacts would be reduced under this Alternative. Alternatives 3, 4, and 5 would not

qualify as the Environmentally Superior Alternative as these alternatives result in greater impacts than the revised Project for at least one environmental issue. Although Alternative 2 is concluded to be the Environmentally Superior Alternative, it would not develop as much market and affordable housing as the proposed Project.

## **6. SUMMARY OF PROJECT IMPACTS**

### **a. Land Use**

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

The Applicant for the Revised Mixed Use Project is proposing to redevelop a portion of an existing shopping center with residential and retail uses of a type and scale that is consistent with existing and planned development in proximity of the Project Site. As such, the Revised Mixed Use Project would be the redevelopment of an existing site and would occur within a portion of a large land area defined by existing roadways. The Revised Mixed Use Project's residential and retail uses would not have adverse effects on adjacent uses and would allow them to operate as they currently do.

Implementation of the Revised Mixed Use Project would occur via discretionary actions approved by the City that would amend the Community Plan and zoning designations for the portion of the Project Site within which the Revised Mixed Use Project would occur from Industrial—Limited Manufacturing and M1-1, to General Commercial and RAS4, respectively. The RAS4 zone, which was recently added to the LAMC, is consistent with the proposed General Plan designation. As described in Section 12.11.5 of the LAMC, the purpose of the RAS4 zone is "...to provide a mechanism to increase housing opportunities, enhance neighborhoods, and revitalize older commercial corridors. The RAS4 Zone is intended to provide a tool to accommodate projected population growth in mixed use and residential project that is compatible with existing residential neighborhoods."

Implementation of the Project would also amend the Community Plan and zoning designations for the Add Areas from Industrial—Limited Manufacturing and M1-1 to General Commercial and C4 to promote a consistent pattern of land use designations on and around the Project Site. The C4 Zone is consistent with the proposed General Plan designation. The hotel and gas station uses currently occurring within the Add Areas are consistent with the proposed Community Plan and zoning designation. No physical changes are proposed for the Add Areas. Therefore, an analysis of any changes to existing development within the Add Areas as a result of the proposed Community Plan amendments and zone changes is deemed to be speculative per CEQA Guidelines Section 15145.

In amending the Community Plan and zoning designations, the Project is removing site designations that are no longer applicable to current conditions, nor consistent with many Community Plan goals and policies, and replacing them with land use designations that are applicable and consistent with what is currently occurring in the Project area. The existing designations reflect historic land use patterns in the Project area and anticipated uses that predate the development of Marina del Rey and the Villa Marina, Marina Marketplace, and Marina Center shopping centers. The Project Site and immediately adjacent areas do not include the industrial uses that were anticipated.

As the Project area has emerged as a center of residential and commercial activity, the development of industrial uses at the Project Site would be incompatible with the existing and projected land uses for the Project area. The proposed land use designation, General Commercial, is one that would typically be assigned to the types of uses located on the Project site and surrounding areas. The RAS4 zone, which is proposed to be applied to the site of the Mixed Use Project, was recently developed to support development that is consistent with the Revised Mixed Use Project and its existing setting. Consistent with the intent described above, the Revised Mixed Use Project would increase housing, enhance the emerging residential neighborhood in proximity to Lincoln Boulevard and Maxella Avenue, contribute to the revitalization of an older commercial corridor, and help to accommodate projected population growth in a mixed use project that is compatible with existing residential neighborhoods. The Revised Mixed Use Project would also implement and be consistent with relevant Coastal Act policies.

The proposed lot line adjustment between the site of the Revised Mixed Use Project and the Add Area to the south would enable the existing hotel access driveway to be relocated to the eastern edge of the site to allow for an enhanced design for the Revised Mixed Use Project. This change would not create any land use impacts upon the existing land uses in the Project area as they would be able to operate as they currently do. In addition, the relocated driveway occurs in the midst of commercial uses and as such would have no impact on any nearby existing residential uses..

The Revised Mixed Use Project would be developed in four-story buildings, with maximum building heights of approximately 55 feet to 67 feet and a floor area ratio (FAR) of 1.93. The Revised building heights along the Lincoln Boulevard and Marina Freeway frontages have been reduced from 70 feet to approximately 55 feet and, as such, are approximately 15 feet lower than what was proposed and analyzed in the Draft EIR. The height of the buildings along the Maxella Avenue frontage would be 67 feet in height. The site of the Revised Mixed Use Project also currently carries a Height District 1 designation. This designation is tied to the current M1 zoning and the development characteristics of industrial buildings within the greater Project area. Within Height District 1, development may occur up to a maximum FAR of 1.5 to 1. The Applicant for the Revised Mixed Use Project is requesting a height district change to

Height District 2, as the FAR for the Revised Mixed Use Project exceeds the 1.5:1 limit. As Height District 2 allows a FAR of 6:1, the Revised Mixed Use Project would be consistent with the density permitted by the requested Height District. Furthermore, the Revised Mixed Use Project's heights and FAR are in keeping with the Project Site and uses in the vicinity. They are similar to other mid-rise developments (approximately 3 to 5 floors in newer projects; e.g., Marina Pointe) located along the Lincoln Boulevard corridor, and they are lower in height than the high-rise residential development further west (i.e., the Water Terrace with approximately 19 floors). The heights of the proposed structures within the Mixed Use Project are also marginally taller than nearby commercial uses and the lower-density residential developments in nearby areas (e.g., Villa Marina, where newer residential projects have been approximately three to four floors). As such, the Revised Mixed Use Project's building heights provide a transition among nearby uses and would be consistent with the general character of the area. Therefore, the land use compatibility impacts of the Revised Mixed Use Project would be less than significant. Furthermore, the Revised Mixed Use Project would be compatible with the existing land use plans, policies, and regulations intended to prevent an impact to the environment. Impacts regarding the regulatory framework would be less than significant.

## **(2) Recommended Mitigation Measures**

Impacts of the Revised Project on land use would be less than significant, as was the case with the prior proposal. No mitigation measures are required.

## **(3) Unavoidable Adverse Impacts**

The Revised Mixed Use Project would not result in a new significant impact or a substantial increase in the severity of a significant impact relative to land use. Thus, pursuant to CEQA Guidelines Section 15088.5, recirculation is not required.

## **(4) Cumulative Impacts**

Development of the related projects is anticipated to occur in accordance with adopted plans and regulations. Based on the information available regarding the related projects, it is reasonable to assume that the projects under consideration in the area surrounding the Project Site would implement and support important local and regional planning goals and policies. Furthermore, each of these projects would be subject to the permit approval process and would incorporate any mitigation measures necessary to reduce potential land use impacts. Therefore, no significant cumulative land use impacts are anticipated. Furthermore, the Revised Mixed Use Project would not result in a new significant cumulative impact nor a substantial increase in the severity of a significant cumulative land use impacts as compared to what was identified in the Draft EIR. Thus, recirculation is not required pursuant to CEQA Guidelines Section 15088.5.

**b. Visual Resources****(1) Environmental Impacts**

The analysis of impacts on visual resources addresses aesthetics, views, and compliance with regulatory policies.

**Aesthetics**

The demolition of the five existing structures and the construction of a planned, landscaped residential community consisting of 244 condominium units and 9,000 square feet of commercial floor area, under the Revised Mixed Use Project, as with the prior proposal analyzed in the Draft EIR, represents a substantial change relative to existing conditions. However, the existing structures and surface parking lots that will be removed under the Revised Mixed Use Project feature minimal landscaping and offer limited aesthetic value to the area. The architectural character of the Revised Mixed Use Project, as with the prior proposal analyzed in the Draft EIR, would be of a contemporary style with colors and details that compliment the Project's proximity to the ocean and the surrounding urban development. Lighting incorporated into the design of the Revised Mixed Use Project, as with the prior proposal analyzed in the Draft EIR, would add decorative highlights to the building façade. In addition, the proposed interior and exterior landscaping to be incorporated into the Revised Mixed Use Project, as with the prior proposal analyzed in the Draft EIR, would compliment the building's contemporary design and provide the residents, visitors, and business patrons with aesthetically pleasing open spaces in addition to reducing the amount of visible surface parking. The resulting appearance of the site of the Revised Mixed Use Project, as with the prior proposal analyzed in the Draft EIR, is consistent with similar developments occurring in the Project area.

The Revised Mixed Use Project, as with the prior proposal analyzed in the Draft EIR, would also be consistent with the General Plan Framework policies regarding urban form. The proposed development of the Revised Mixed Use Project, as with the prior proposal analyzed in the Draft EIR, would enhance the livability of the community by upgrading the quality of on-site development. Specifically, the Revised Mixed Use Project, as with the prior proposal analyzed in the Draft EIR, would improve the architectural character of the Project Site by providing new aesthetically pleasing residential and commercial uses that connect with the surrounding urban and coastal environments. The proposed density, height, and bulk of the proposed structures within the Revised Mixed Use Project, as with the prior proposal analyzed in the Draft EIR, would not substantially contrast with the visual character of the surrounding area, since the proposed structures would be consistent in scale with the existing residential and commercial development in the Project vicinity. Furthermore, the reduction in height and massing under the Revised Mixed Use Project along the Project's Lincoln Boulevard and Marina Freeway frontages would enhance the integration of the Revised Mixed Use Project into the aesthetic environment

that surrounds the Project site. No physical changes are proposed for the Add Areas. As such, similar to the prior proposal as analyzed in the Draft EIR, the impacts of the Revised Mixed Use Project on aesthetics would be less than significant.

### **Views**

The valued visual resources in the Project area consist of views of the Marina del Rey marina and the Pacific Ocean. Views of the identified visual resources are generally not available from the public streets and freeways in the Project area because of the flat topography of the area and the presence of existing intervening structures that block the views of these visual resources.

Public views of the Project Site are generally limited to the street and freeway corridors approaching or adjacent to the Project Site. The site of the Revised Mixed Use Project, as with the prior proposal analyzed in the Draft EIR, is one that is located on the western edge of the Villa Marina shopping center bordered by Lincoln Boulevard on the west, State Route 90 (Marina Freeway) on the south, and Maxella Avenue on the north. The Revised Mixed Use Project, as with the prior proposal analyzed in the Draft EIR, would not substantially obstruct a view of a valued view resource from these vantage points, since no such views currently exist. However, the tops of the proposed structures within the Revised Mixed Use Project would likely be visible from these points.

Although the demolition of the five existing structures and the construction of a landscaped residential community with retail uses represent a substantial change, development of the Revised Mixed Use Project, as with the prior proposal analyzed in the Draft EIR, would not substantially obstruct an existing view of a valued view resource from a public or private vantage location. The extent to which the Revised Mixed Use Project would detract from the limited views in the area is negligible. Furthermore, the building heights under the Revised Mixed Use Project would be reduced from approximately 70 feet, as analyzed in the Draft EIR, to 55 feet along the Marina Freeway and Lincoln Boulevard frontages and 67 feet along the Maxella Avenue Frontage. Therefore, the view impact of the Revised Mixed Use Project would be similar to what was analyzed for the prior proposal in the Draft EIR, due to the minor reduction in building height. No physical changes are proposed for the Add Areas. Therefore, similar to the prior proposal as analyzed in the Draft EIR, the Revised Mixed Use Project impacts on views would be less than significant.

## (2) Recommended Mitigation Measures

The following mitigation measures, which are the same as those recommended in the Draft EIR, are proposed to further reduce the Revised Mixed Use Project's less than significant impacts on visual qualities.

**Mitigation Measure B-1** The Applicant shall ensure, through appropriate postings and daily visual inspections, that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways, and that any such temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period.

**Mitigation Measure B-2** Building façades facing public streets shall be designed to enhance the pedestrian experience and connectivity with adjacent uses.

**Mitigation Measure B-3** New utilities shall be constructed underground, to the extent feasible.

**Mitigation Measure B-4** Exterior signage for the proposed buildings shall be compatible with the design of the proposed building.

**Mitigation Measure B-5** All new or replacement street trees shall be selected for consistency with the existing street trees or in accordance with a street tree master plan reviewed and approved by the Department of Public Works Street Tree Division.

**Mitigation Measure B-6** All mechanical, electrical and rooftop equipment shall be screened from view from adjacent surface streets.

**Mitigation Measure B-7** Landscaping and/or vegetation features shall be incorporated into the design of the site of the Mixed Use Project.

**Mitigation Measure B-8** All exterior lighting shall be directed on-site or shielded to limit light spillover effects.

## (3) Unavoidable Adverse Impacts

Design features incorporated into the Revised Mixed Use Project, including, but not limited to, landscaping, architectural articulation, and pedestrian amenities, together with the recommended mitigation measures, would further reduce the Revised Mixed Use Project's less than significant impacts on visual resources. As no physical changes are proposed to occur

within the Add Areas, less than significant impacts on visual resources would occur. The Revised Mixed Use Project would not result in a new significant impact nor a substantial increase in the severity of a significant visual impact as compared to what was identified in the Draft EIR. Thus, recirculation is not required pursuant to CEQA Guidelines Section 15088.5.

#### **(4) Cumulative Impacts**

There are no projects planned or under construction in the immediate vicinity of the Project Site and thus there are no projects that would alter the visual environment in the area immediately surrounding the Project Site. Related projects requiring discretionary actions would adhere to existing General Plan and Community Plan design guidelines. Ultimately, cumulative projects and ambient background growth would upgrade the visual character of the Project area. It is concluded that no significant cumulative impacts upon visual quality or views would occur. As the Revised Mixed Use Project would not result in a new significant cumulative impact nor a substantial increase in the severity of a significant cumulative visual impact, as compared to what was identified in the Draft EIR, recirculation is not required under CEQA Guidelines 15088.5.

### **c. Traffic, Circulation and Parking**

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

Development of the proposed Mixed Use Project, as analyzed in the Draft EIR, would generate a net increase of 124 and 129 trips during the morning and afternoon peak-hour periods, respectively. These trip-generation forecasts reflect the removal of the existing on-site uses. With the proposed reduction in the number of residential units, the number of morning and afternoon trips, as discussed below, would be less than that analyzed in the Draft EIR. Development of the Mixed Use Project, as analyzed in the Draft EIR, would result in significant impacts at 2 of the 11 study intersections during the afternoon peak hour under cumulative plus Mixed Use Project conditions. The locations of the two significantly impacted intersections are as follows:

- Glencoe Avenue and Washington Boulevard; and
- Lincoln Boulevard and Maxella Avenue.

Impacts on traffic attributable to the Mixed Use Project, as analyzed in the Draft EIR, would be less than significant at the other nine intersections analyzed. An updated traffic analysis has been conducted based on the Revised Mixed Use Project. The results of the analysis are that the two significant impacts identified above would be eliminated with the reduction in

the number of residential units from 310 to 244. Therefore, the development of the Revised Mixed Use Project would have a less than significant traffic impact at all 11 analyzed intersections. As the Revised Mixed Use Project would result in less than significant traffic impacts, no mitigation measures are required.

The analysis of the Mixed Use Project driveway on Maxella Avenue, as analyzed in the Draft EIR, indicates that it would operate at LOS C or better during the morning and afternoon peak hour under cumulative plus Mixed Use Project conditions. Based on the proposed Mixed Use Project's traffic assignment, as analyzed in the Draft EIR, approximately 65 daily trips are estimated to travel along Maxella Avenue east of Glencoe Avenue. Using the neighborhood street impact criteria, the increase in daily traffic attributable to the Mixed Use Project, as analyzed in the Draft EIR, would not exceed the impact criteria. This conclusion also applies to the Revised Mixed Use Project as the number of daily trips traveling along Maxella Avenue east of Glencoe Avenue would be equal to or less than those generated by the greater number of residential units which served as the basis for the analysis presented in the Draft EIR.

The Mixed Use Project, as analyzed in the Draft EIR, would only increase public transit ridership by six trips in the afternoon peak hour. The eight bus lines provided within the Project area would provide adequate transit service to the Mixed Use Project. In addition, the Mixed Use Project, as analyzed in the Draft EIR, is not expected to add 50 or more new trips per hour to a CMP arterial monitoring intersection, nor would the Mixed Use Project, as analyzed in the Draft EIR, add 150 or more new trips per hour to the nearest mainline freeway monitoring location in either direction. Trips during the Mixed Use Project's construction stage, as analyzed in the Draft EIR, would be considerably less than the approximately 1,250 daily trips that are currently being generated by the existing on-site uses. These conclusions also apply to the Revised Mixed Use Project as the number of transit trips traveling and trips on the CMP network would be equal to or less than those generated by the greater number of residential units which served as the basis for the analysis presented in the Draft EIR.

Impacts attributable to the Mixed Use Project, as analyzed in the Draft EIR, on traffic conditions during Project construction, Project access, local neighborhood streets, the provision of transit services in the Project area, and implementation of the Los Angeles County Congestion Management Plan (CMP) would be less than significant. While the total amount of construction for the Revised Mixed Use Project is anticipated to be less than that analyzed in the Draft EIR, due to the reduction in the number of residential units to be constructed, peak construction activities are assumed to be comparable. As such, impacts of the Revised Mixed Use Project on traffic conditions during construction, as is the case with the Mixed Use Project analyzed in the Draft EIR, would be less than significant. The conclusion of a less than significant impact with regard to the other transportation issues discussed in this paragraph would also apply to the Revised Mixed Use Project for the following two reasons: (1) the impacts for these transportation issues are a function of the amount of development, which is reduced under the

Revised Mixed Use Project; and (2) the Project's design relative to these traffic issues is unchanged under the Revised Mixed Use Project.

The Mixed Use Project currently proposes to supply a total of 594 parking spaces to accommodate the anticipated number of residents, guests, employees, and patrons. The parking demand for the Revised Mixed Use Project, based on the analysis presented in the Draft EIR, is forecasted to be less than the proposed on-site supply of 594 spaces. This amount of parking also exceeds applicable Los Angeles Municipal Code (LAMC) requirements. As the proposed parking supply exceeds both LAMC requirements and its parking demand, the parking impacts of the Revised Mixed Use Project would be less than significant.

The proposed lot line adjustment that would relocate the hotel access driveway to the eastern boundary of the Revised Mixed Use Project site would result in a less than significant traffic impact as the proposed driveway relocation would not change the number of existing access points occurring along Maxella Avenue and would not have an adverse impact on traffic circulation patterns in the area.

As no physical changes would occur within the Add Areas, no traffic impacts would occur.

### **(2) Recommended Mitigation Measures**

With the proposed reduction in residential development, implementation of the Revised Mixed Use Project would result in less than significant traffic impacts at the 11 analyzed intersections. As such, no mitigation measures are required.

### **(3) Unavoidable Adverse Impacts**

Development of the Revised Mixed Use Project would result in less than significant traffic impacts across all of the traffic issues analyzed in the EIR. Based on this conclusion, the significant traffic impacts identified in the Draft EIR would be eliminated under the Revised Mixed Use Project. As no physical changes would occur within the Add Areas, no traffic impacts would occur.

### **(4) Cumulative Impacts**

All of the identified related projects have been considered for the purpose of assessing cumulative traffic impacts. Year 2008 with Cumulative Base conditions demonstrate that cumulative development would result in four intersections operating at LOS E or F during the morning peak hour, while six intersections are also expected to operate at unacceptable Levels of

Service during the afternoon peak hour. Since no guarantee exists wherein mitigation measures would be implemented with the identified related projects, it is conservatively concluded that cumulative development would yield a significant cumulative traffic impact on intersection operations. This is the same conclusion as that set forth in the Draft EIR. Furthermore, the Revised Mixed Use Project would not result in any new significant cumulative impacts nor a substantial increase in the severity of a significant cumulative traffic impact as compared to that identified in the Draft EIR. Thus, recirculation is not required pursuant to CEQA Guidelines Section 15088.5.

#### **d. Air Quality**

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

The analysis of air quality impacts addresses both construction and operational period impacts.

##### **Construction Impacts**

Construction of the Revised Mixed Use Project would include the demolition of existing structures, construction of building foundations, and, lastly, building construction. Construction would include the excavation and exportation of approximately 100,000 cubic yards of earth for the development of the Mixed Use Project's subterranean parking facility. Construction of the Revised Mixed Use Project would be expected to occur over a 25-month timeframe and would begin in January 2006. In addition, there may be overlapping construction phases.

While the total amount of construction for the Revised Mixed Use Project is anticipated to be less than that analyzed in the Draft EIR, due to the reduction in the number of residential units to be constructed, peak construction activities are assumed to be comparable. As such, impacts of the Revised Mixed Use Project on air quality would be the same as those forecasted to occur in the Draft EIR. Therefore, construction-related daily emissions, attributable to the development of the Revised Mixed Use Project, would not exceed SCAQMD significance thresholds for CO, PM<sub>10</sub>, or SO<sub>x</sub>. However, construction-related daily emissions would exceed SCAQMD significance thresholds for ROC and NO<sub>x</sub>. Thus, construction emissions attributable to the development of the Revised Mixed Use Project would result in a significant regional air quality impact. Whereas regional construction emissions are significant, localized emissions during construction of the Revised Mixed Use Project would not exceed the SCAQMD's daily significance thresholds for NO<sub>2</sub>, PM<sub>10</sub>, or CO. Therefore, potential impacts to localized air quality during construction would be less than significant.

The greatest potential for toxic air contaminant (TAC) emissions during construction of the Mixed Use Project would be related to diesel particulate emissions associated with heavy

equipment operations during grading and excavation activities. Given the Mixed Use Project's construction schedule of 25 months and that construction activity would emit a maximum of 3 pounds per day of diesel particulate emissions, the Revised Mixed Use Project would not result in a long-term (i.e., 70 years) substantial source of TAC emissions. As such, potential impacts related to TAC emissions during construction would be less than significant.

As no physical changes would occur within the Add Areas, no construction air quality impacts would occur.

### **Operational Impacts**

Regional air pollutant emissions associated with operations of the Revised Mixed Use Project would be generated by the consumption of electricity and natural gas and by the operation of on-road vehicles. The large majority of the operational emissions are attributable to the number of new daily vehicle trips. As the number of daily trips attributable to the Revised Mixed Use Project is anticipated to be reduced from those analyzed in the Draft EIR, it is conservatively concluded that operational emissions under the Revised Mixed Use Project would be the same as those forecasted in the Draft EIR. Therefore, regional emissions resulting from the Revised Mixed Use Project would not exceed regional SCAQMD thresholds for ROC, NO<sub>x</sub>, SO<sub>x</sub>, CO, or PM<sub>10</sub>. Therefore, impacts associated with these pollutants would be less than significant.

Within an urban setting, vehicle exhaust is the primary source of CO. Consequently, the highest CO concentrations are generally found within close proximity to congested intersection locations. Traffic, during the operational phase of the Revised Mixed Use Project, would have the potential to create local area CO impacts. Based on the analysis of CO impacts presented in the Draft EIR, the Mixed Use Project, as analyzed in the Draft EIR, would not have a significant impact upon 1-hour or 8-hour local CO concentrations. As the Mixed Use Project, as analyzed in the Draft EIR, does not cause an exceedance of an ambient air quality standard, the localized operational air quality impacts attributable to the Mixed Use Project, as analyzed in the Draft EIR, would therefore be less than significant. This conclusion also applies to the Revised Mixed Use Project as the number of peak hour trips traveling through area intersections would be equal to or less than those generated by the greater number of residential units which served as the basis for the analysis presented in the Draft EIR.

The primary source of potential air toxics associated with proposed operations of the Revised Mixed Use Project would be diesel particulates from delivery trucks (e.g., truck traffic on local streets and on-site truck idling). Potential localized air toxic impacts from on-site sources of diesel particulate emissions would be minimal since only a limited number of heavy-duty trucks would access the Project Site and the trucks that do visit the site would not idle on the Project Site for extended periods of time. Based on the limited activity of the toxic air

contaminant sources, potential air toxic impacts attributable to the Revised Mixed Use Project would be less than significant.

Overall, the Revised Mixed Use Project is found to be consistent with the SCAQMD's AQMP, as the Revised Mixed Use Project would not cause or worsen an exceedance of an ambient air quality standard, would not delay the attainment of an air quality standard, is consistent with the AQMP's growth projections, implements all feasible air quality mitigation measures, and would be consistent with the AQMP's land use policies.

The Revised Mixed Use Project would reduce vehicle trips and vehicle miles traveled through site selection and smart growth development practices. In addition, development of the Revised Mixed Use Project offers the opportunity to utilize existing infrastructure to support growth in the Project area. It is well served by bus transit and bicycle paths, and has the opportunity to encourage pedestrian activities in this area. The Revised Project would thus serve to implement a number of City, SCAG, and SCAQMD air quality policies related to regional land use planning. Therefore, similar to the prior proposal analyzed in the Draft EIR, no significant impacts would occur as a result of development of the Revised Mixed Use Project with respect to consistency with applicable air quality policies.

As no physical changes would occur within the Add Areas, no operational air quality impacts would occur.

## **(2) Recommended Mitigation Measures**

The following mitigation measures, which are the same as those recommended in the Draft EIR, apply to the development of the Revised Mixed Use Project.

### **Construction**

**Mitigation Measure D-1** All land clearing/earth-moving activity areas shall be watered to control dust as necessary to remain visibly moist during active operations.

**Mitigation Measure D-2** Water three times daily or non-toxic soil stabilizers shall be applied, according to manufacturers' specifications, as needed to reduce off-site transport of fugitive dust from all unpaved staging areas and unpaved road surfaces.

**Mitigation Measure D-3** Streets shall be swept as needed during construction, but not more frequently than hourly, if visible soil material has been carried onto adjacent public paved roads.

**Mitigation Measure D-4** Construction equipment shall be visually inspected prior to leaving the site and loose dirt shall be washed off with wheel washers as necessary.

**Mitigation Measure D-5** Traffic speeds on all unpaved roads shall not exceed 15 MPH.

**Mitigation Measure D-6** All construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

**Mitigation Measure D-7** General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues will have their engines turned off when not in use, to reduce vehicle emissions. Construction activities should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.

**Mitigation Measure D-8** To the extent possible, petroleum powered construction equipment shall utilize electricity from power poles rather than temporary diesel power generators and/or gasoline power generators.

**Mitigation Measure D-9** On-site mobile construction equipment shall be powered by alternative fuel sources (i.e., methanol, natural gas, propane or butane) as feasible.

**Mitigation Measure D-10** All contractors shall be required to participate in a common carpool registry which provides a list of construction workers willing to carpool and home locations during all periods of contract performance.

### **Operations**

Proposed operations associated with the Revised Mixed Use Project, as with the prior proposal analyzed in the Draft EIR, would not result in any significant impacts to air quality; therefore, no mitigation measures are recommended or required.

### **(3) Unavoidable Adverse Impacts**

#### **Construction**

The mitigation measures identified above would serve to reduce ROC emissions during construction of the Revised Mixed Use Project to a level that is less than significant. Nonetheless, construction of the Revised Mixed Use Project would still result in regional NO<sub>x</sub>

emissions that exceed the SCAQMD regional daily significance threshold. Therefore, construction of the Revised Mixed Use Project would result in a significant and unavoidable impact on regional air quality during construction. Localized emissions during construction of the Revised Mixed Use Project would not exceed the SCAQMD's daily significance thresholds for NO<sub>2</sub>, PM<sub>10</sub>, or CO. As such, potential impacts to localized air quality during construction of the Revised Mixed Use Project would be less than significant. In addition, potential impacts related to TAC emissions during construction of the Revised Mixed Use Project are also concluded to be less than significant. As no physical changes would occur within the Add Areas, no construction air quality impacts would occur. Furthermore, recirculation is not required pursuant to CEQA Guidelines Section 15088.5 since there would be no new significant impacts nor a substantial increase in the severity of a significant construction air quality impact, as compared to what was identified in the Draft EIR.

### **Operations**

Operational emissions attributable to the Revised Mixed Use Project, as with the prior proposal analyzed in the Draft EIR, would not exceed the SCAQMD's significance threshold for ROC, NO<sub>x</sub>, CO, PM<sub>10</sub>, or SO<sub>x</sub>, and, as such, potential impacts to regional air quality would be less than significant. In addition, development of the Revised Mixed Use Project would result in less than significant impacts on local CO concentrations, releases of TAC emissions, and consistency with the SCAQMD's AQMP and the City's General Plan. As no physical changes would occur within the Add Areas, no operational air quality impacts would occur. Furthermore, the Revised Mixed Use Project would not result in a new significant cumulative impact nor a substantial increase in the severity of a significant cumulative operational air quality impact as compared to what was identified in the Draft EIR. Thus, recirculation is not required pursuant to CEQA Guidelines Section 15088.5.

### **(4) Cumulative Impacts**

#### **Construction**

There are 23 related projects identified within the proposed Project study area. Since the Applicant has no control over the timing or sequencing of the related projects, any quantitative analysis to ascertain daily construction emissions that assumes multiple concurrent construction projects would be speculative.

With respect to the construction-period air quality emissions attributable to the Revised Mixed Use Project and cumulative Basin-wide conditions, the Revised Mixed Use Project would comply with SCAQMD Rule 403 and, in doing so, would implement all feasible mitigation measures. In addition, the Revised Mixed Use Project would comply with adopted AQMP emissions control measures. Per SCAQMD rules and mandates and the CEQA requirement that

significant impacts be mitigated to the extent feasible, it is assumed that these same requirements would also be imposed on construction projects Basin-wide, which would include each of the 23 related projects. With respect to TAC emissions during construction, none of the related projects are in the immediate vicinity of the Project Site (i.e., within 500 feet), and given that construction activities for the Revised Mixed Use Project are scheduled to occur for 25 months and on-site construction equipment would emit a maximum of 3 pounds per day of diesel particulate matter, TAC emissions during construction of the Revised Mixed Use Project would not be cumulatively considerable. All of the related projects that have the potential to emit notable quantities of TACs would be regulated by the SCAQMD such that TAC emissions would be negligible. Thus, TAC emissions from the related projects are anticipated to be less than significant unto themselves, as well as cumulatively in conjunction with the Revised Project.

In conclusion, the Revised Mixed Use Project's contribution to regional air quality degradation during construction would be similar during peak construction periods, but reduced overall due to the reduction in total development under the Revised Mixed Use Project as compared to the prior proposed as analyzed in the Draft EIR. Based on peak construction emission levels, construction emissions attributable to the Revised Mixed Use Project, as with the prior proposal analyzed in the Draft EIR, would be cumulatively significant, as the Basin is non-attainment for O<sub>3</sub> and PM<sub>10</sub>, and the Revised Mixed Use Project would result in regional construction-period NO<sub>x</sub> and ROC emissions (O<sub>3</sub> precursors) that exceed the SCAQMD daily significance threshold. Furthermore, the Revised Mixed Use Project would not result in any new significant cumulative construction air quality impact nor a substantial increase in the severity of a significant cumulative construction air quality impact as compared to that identified in the Draft EIR. Thus, recirculation is not required pursuant to CEQA Guidelines Section 15088.5.

### **Operation**

The analysis of cumulative air quality operational impacts focuses on determining whether the Revised Mixed Use Project is consistent with forecasted future regional growth. Therefore, if all cumulative projects are individually consistent with the growth assumptions upon which the SCAQMD's AQMP is based, then future development would not impede the attainment of ambient air quality standards and a significant cumulative air quality impact would not occur.

A project would have a significant cumulative air quality impact if the ratio of daily project-related employee or population vehicle miles traveled to daily countywide vehicle miles traveled exceeds the ratio of daily project-related employees or population to daily countywide employees. The daily Mixed Use Project to countywide VMT ratios, as analyzed in the Draft EIR, are not greater than the Mixed Use Project to countywide employee and population ratios, as analyzed in the Draft EIR. Based on these criteria, development of the Mixed Use Project, as analyzed in the Draft EIR, would have a less than significant cumulative operational air quality

impact. This same conclusion applies to the Revised Mixed Use Project as it represents a proportional reduction in vehicle miles traveled by on-site residents. In addition, the localized CO impact analysis that was conducted for cumulative traffic (i.e., related projects and ambient growth through 2007) in the Draft EIR concluded that no local CO violations would occur at any of the studied intersections. This same conclusion applies to the Revised Mixed Use Project, as the traffic conditions attributable to the related projects are independent of what occurs on the Project site. Therefore, as with the prior proposal analyzed in the Draft EIR the Revised Project would have a less than significant cumulative impact on localized air quality.

With respect to TAC emissions, neither the Revised Project nor any of the 23 related projects (which are largely residential, restaurant and retail/commercial developments) would represent a substantial source of TAC emissions, which are typically associated with large-scale industrial, manufacturing and transportation hub facilities. However, the Revised Mixed Use Project and each of the 23 related projects would likely generate minimal TAC emissions related to the use of consumer products, landscape maintenance activities, etc. As such, cumulative TAC emissions during long-term operations of the Revised Mixed Use Project, as with the prior proposal analyzed in the Draft EIR, would be less than significant.

In summary, the Revised Mixed Use Project would not result in any new significant cumulative operational air quality impact nor a substantial increase in the severity of a significant cumulative operational air quality impact as compared to that identified in the Draft EIR. Thus, recirculation is not required pursuant to CEQA Guidelines Section 15088.5.

**e. Noise**

**(1) Environmental Impacts**

**Construction Noise**

Noise disturbances in those areas located adjacent to the Project Site can be expected during construction. As with most construction projects, construction of the Revised Mixed Use Project would require the use of a number of pieces of heavy-duty construction equipment, such as bulldozers, backhoes, cranes, loaders, and concrete mixers. In addition, both heavy- and light-duty trucks would be required to deliver construction materials to and export construction debris from the site of the Revised Mixed Use Project.

Construction of the Revised Mixed Use Project is anticipated to occur over a shorter duration when compared to the prior proposal as analyzed in the Draft EIR. However, peak construction levels are anticipated to be comparable. As such, construction-period noise levels attributable to the Revised Mixed Use Project, as with the prior proposal analyzed in the Draft

EIR, would be as high as 86 dBA or more along the Marriott Hotel property line. Construction noise attributable to the Revised Mixed Use Project, as with the prior proposal analyzed in the Draft EIR, would exceed the ambient noise level at the Marriott Hotel property by as much as 27.9 dBA during periods of intense construction activity. However, at more distant locations, such as the residential uses located west of Lincoln Boulevard, the residential uses located east of Glencoe Avenue, and at the Daniel Freeman Marina Hospital, noise impacts during construction of the Revised Mixed Use Project, as with the prior proposal analyzed in the Draft EIR, would be substantially less (i.e., 3.6 dBA maximum noise level increase). Nevertheless, as with the prior proposal analyzed in the Draft EIR, since the construction-related noise level increase would exceed the 5-dBA significance criterion at the Marriott Hotel property, impacts during construction of the Revised Mixed Use Project would be significant.

As no physical changes would occur within the Add Areas, no construction noise impacts would occur.

### **Operation Noise (Post-Construction)**

#### **(a) Off-Site Locations**

##### **(i) Roadway Noise**

The proposed Mixed Use Project, as analyzed in the Draft EIR, is expected to generate a maximum of 1,290 net daily trips. The largest traffic noise impact, attributable to the proposed Mixed Use Project, as analyzed in the Draft EIR, is anticipated to occur along the segment of Maxella Avenue between Lincoln Boulevard and Glencoe Avenue. Traffic attributable to the Mixed Use Project, as analyzed in the Draft EIR, would add 0.3 dBA CNEL to this roadway segment, while related project plus ambient growth traffic volumes are expected to add an additional 0.3 dBA CNEL to this roadway segment, for a combined total noise level increase of 0.6 dBA CNEL. The largest overall roadway noise impact attributable to the Mixed Use Project, as analyzed in the Draft EIR, is anticipated to occur along the segment of Lincoln Boulevard between the Marina Freeway and Mindanao Way, where cumulative traffic increases (i.e., Mixed Use Project, related projects, and ambient growth traffic volumes) would add 1.7 dBA CNEL to this roadway segment. As the incremental increases in noise levels at all other analyzed locations are less than 1.7 dBA CNEL and these noise level increases are less than 3 dBA CNEL significance threshold, roadway noise impacts attributable to the Mixed Use Project, as analyzed in the Draft EIR, would be less than significant. As the number of daily trips attributable to the Revised Mixed Use Project is anticipated to be reduced from those analyzed in the Draft EIR, it is conservatively concluded that roadway noise levels under the Revised Mixed Use Project would be the same as those forecasted in the Draft EIR. Therefore, roadway noise levels of the Revised Mixed Use Project would be less than significant. The proposed relocation of the hotel access driveway is anticipated to result in a less than significant noise impact as the noise levels

associated with this facility are such that they would be attenuated to less than ambient noise levels at the nearest sensitive receptor. Thus, similar to the prior proposal analyzed in the Draft EIR, roadway noise impacts attributable to this aspect of the Revised Project would be reduced to less than significant levels.

### **(ii) Stationary Noise**

Design features incorporated into the Revised Mixed Use Project would ensure that rooftop equipment noise levels would comply with City of Los Angeles Noise Ordinance requirements, for both daytime (50 dBA) and nighttime (40 dBA) operation. In addition, implementation of design features incorporated into the Revised Mixed Use Project would ensure that any noise level increase remains below the 5-dBA significance threshold. As such, stationary-source noise impacts would be less than significant.

The Revised Mixed Use Project may include an outdoor pool. The pool and spa area would serve as a potential noise source for nearby sensitive receivers. Although the pool and spa area would serve as a noise source, sensitive receivers surrounding the Project area would not be exposed to adverse noise levels due to the shielding provided by the buildings surrounding the pool area. Therefore, pool operations within the new residential building and associated commercial area would not result in a substantial increase in ambient noise levels. Potential impacts would be less than significant.

Each of the proposed 244 condominium units within the Revised Mixed Use Project would have its own balcony, which would be a potential source for noise related to small outdoor gatherings. Most of the time, these balconies would remain vacant. Nevertheless, similar to the prior proposal analyzed in the Draft EIR, noise events related to these personal residence balconies would be infrequent and temporary, and compliance with the homeowner's association covenants, conditions and restrictions (CC&Rs)<sup>3</sup> and the City's Noise Ordinance would ensure that potential impacts attributable to the Revised Mixed Use Project remain less than significant.

Parking demand associated with the Revised Mixed Use Project would be met through a combination of subterranean and surface lot parking, with ingress/egress facilitated by a driveway that would connect to Maxella Avenue. For the most part, noise events that occur from within the subterranean parking areas would be inaudible outside such areas; and noise levels that emanate from surface lot activities would be similar to noise that currently emanates from

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<sup>3</sup> *CC&Rs are the governing documents that dictate how the homeowners association operates and what rules the owners, and their tenants and guests, must obey. These legal documents might also be called the bylaws, the master deed, the houses rules, or another name. These documents and rules are legally enforceable by the homeowners association, unless a specific provision conflicts with federal, state or local laws.*

the existing surface parking areas that would be displaced by the Revised Mixed Use Project as the use of the area as a surface parking lot would be unchanged. As a result, potential noise impacts that may result due to the parking and vehicle circulation areas associated with the Revised Mixed Use Project would be less than significant, as was the case with the prior proposal analyzed in the Draft EIR.

All refuse collection areas associated with the Revised Mixed Use Project, as with the prior proposal analyzed in the Draft EIR, would be fully enclosed and/or shielded from noise-sensitive uses with 6-foot masonry block walls. As such, noise from refuse-related activities, such as truck movements/idling and unloading operations, would not have the potential to adversely impact adjacent land uses during long-term operations of the Revised Mixed Use Project, as with the prior proposal analyzed in the Draft EIR,. Potential impacts would be less than significant under the Revised Mixed Use Project, as was the case with the prior proposal analyzed in the Draft EIR.

With respect to land use compatibility, as represented by the CNEL descriptor, an evaluation of community noise from all sources (i.e., composite noise level) associated with the Mixed Use Project, as analyzed in the Draft EIR, was conducted to conservatively ascertain its contributions to the CNEL at neighboring properties. For purposes of calculating the composite noise level, all noise events (i.e., noise from roadway traffic volumes, miscellaneous equipment, courtyard/swimming pool areas, parking/vehicle circulation areas, and refuse collection areas) were based on the temporal nature of each activity over a 24-hour period. Based on this analysis, the largest composite noise impact attributable to the Mixed Use Project, as analyzed in the Draft EIR, would be 0.8 dBA CNEL at the Marriott Hotel property line, where the CNEL could potentially increase from 56.7 dBA to 57.5 dBA. The CNEL increase at all other receiver locations would increase by less than 0.1 dBA. As such, these noise level increases are less than the 3-dBA CNEL significance threshold. Potential impacts attributable to the Mixed Use Project, as analyzed in the Draft EIR, would be less than significant. In addition, composite noise impacts were evaluated with respect to average daytime and nighttime  $L_{eq}$  (1-hour) noise levels. Based on this analysis, the worst-case composite noise impact attributable to the Mixed Use Project, as analyzed in the Draft EIR, would be 0.8 dBA  $L_{eq}$  (1-hour) at the Marriott Hotel property line, where the nighttime  $L_{eq}$  (1-hour) could potentially increase from 55.0 dBA to 55.8 dBA. The composite increase in nighttime or daytime average  $L_{eq}$  (1-hour) at all other receiver locations would be 0.3 dBA or less. Potential impacts attributable to the Mixed Use Project, as analyzed in the Draft EIR, would be less than significant. Noise levels from all sources attributable to the Revised Mixed Use Project, with the exception of roadway noise, would be the same as those attributable to the Mixed Use Project analyzed in the Draft EIR. As roadway noise levels under the Revised Mixed Use Project are conservatively concluded to be the same as those forecasted in the Draft EIR, as described above, composite noise levels for the Revised Mixed Use Project would be the same as those analyzed in the Draft EIR. Therefore, development of the Revised Mixed Use Project, as is the case with the Mixed Use Project as

analyzed in the Draft EIR, would result in composite CNEL and  $L_{eq}$  noise impacts that are less than significant.

### **(b) On-Site Locations**

The analysis of noise levels at on-site locations focuses on the potential for the future residents of the Revised Mixed Use Project to be exposed to noise levels that exceed established City standards. The predominant noise source at the Project Site now, and in the future, is roadway noise from the Marina Freeway (State Route 90), Lincoln Boulevard and Maxella Avenue. Based on the future noise level estimate of between 64.4 and approximately 70 dBA CNEL on, and in proximity to, the Revised Mixed Use Project, noise levels along the Revised Mixed Use Project's Marina Freeway and Lincoln Boulevard frontages, as with the prior proposal analyzed in the Draft EIR, may exceed the City-recommended noise standard (i.e., 65 dBA CNEL) for the siting of multi-family residential dwelling units. As such, similar to the prior proposal analyzed in the Draft EIR, on-site CNEL impacts within the Revised Mixed Use Project could be potentially significant without the incorporation of mitigation measures.

As no physical changes would occur within the Add Areas, no operational noise impacts would occur.

## **(2) Recommended Mitigation Measures**

### **Construction**

As noise associated with on-site construction of the Revised Mixed Use Project during peak construction periods would be the same as those analyzed in the Draft EIR for the prior proposal, the Revised Mixed Use Project would have the potential to result in a significant impact. Thus, the following mitigation measure, which is that same as that recommended in the Draft EIR, is prescribed to minimize construction-related noise impacts:

**Mitigation Measure E-1** An 8-foot-high temporary sound barrier (e.g., solid wood fence) shall be erected between the property line of the proposed Mixed Use Project and the Marriott Hotel property; and an acoustical lining shall be affixed to the exterior scaffolding apparatus such that, to the greatest extent feasible, the line of site between the Marriott Hotel property and the site of the Mixed Use Project's construction activity is blocked.

### **Operation**

Future roadway noise levels within the Revised Mixed Use Project, as was the case with the prior proposal analyzed in the Draft EIR, would exceed established levels. Thus, the

following mitigation measure, which is the same as that recommended in the Draft EIR, is recommended:

**Mitigation Measure E-2** All exterior walls and floor-ceiling assemblies within the proposed Mixed Use Project (unless within a residential unit) that face Lincoln Boulevard or the Marina Freeway shall be constructed with double-paned glass or an equivalent and in a manner to provide an airborne sound insulation system achieving a Sound Transmission Class of 50 (45 if field tested) as defined in the UBC Standard No. 35-1, 1982 edition. Advisory Agency sign-off shall be required prior to the issuance of a building permit for the proposed Mixed Use Project. The Applicant, as an alternative, may retain an engineer registered in the State of California with expertise in acoustical engineering, who shall submit a signed report for an alternative means of sound insulation satisfactory to the Advisory Agency which achieves a maximum interior noise of CNEL 45 (residential standard).

### (3) Unavoidable Adverse Impacts

#### Construction

The 8-foot temporary sound barrier and acoustic linings prescribed in Mitigation Measure E-1 can achieve barrier insertion losses of approximately 6 dBA and 15 dBA, respectively, or more in areas where the line of sight between construction noise sources and off-site receiver locations is interrupted. Assuming a minimum noise reduction of 6 dBA, the Revised Mixed Use Project's worst-case construction-period  $L_{eq}$  would be reduced to approximately 80 dBA at areas along the adjoining property line with the Marriott Hotel property, which is still 21.9 dBA above the baseline ambient noise level, similar to the prior proposal analyzed in the Draft EIR. Average  $L_{eq}$  noise levels during construction of the Revised Mixed Use Project within the Marriott Hotel property would continue to exceed the ambient noise level by more than the 5-dBA significance criterion. As such, this impact is concluded to be significant and unavoidable. As no physical changes would occur within the Add Areas, no construction noise impacts would occur. Furthermore, since the Revised Mixed Use Project would not result in a new significant construction noise impact nor a substantial increase in the severity of a significant construction noise impact, recirculation is not required pursuant to CEQA Guidelines Section 15088.5.

#### Operation

Development of the Revised Mixed Use Project would result in less than significant off-site noise impacts during long-term Project operations. With the addition of Mitigation Measure E-2, interior noise levels within each residential dwelling unit within the Revised Mixed Use Project would meet adopted City standards. As such, potential impacts with respect to community noise

levels would be less than significant. As no physical changes would occur within the Add Areas, no operational noise impacts would occur. In addition, the Revised Mixed Use Project would not result in a new significant operational noise impact nor a substantial increase in the severity of a significant operational noise impact, recirculation is not required pursuant to CEQA Guidelines Section 15088.5.

#### **(4) Cumulative Impacts**

All of the identified related projects have been considered for the purposes of assessing cumulative noise impacts. The potential for noise impacts to occur are specific to the location of each related project as well as the cumulative traffic on the surrounding roadway network.

#### **Construction**

There are 23 related projects located within the proposed Project vicinity that have a potential to produce construction noise impacts. Since the timing of construction activities for these related projects cannot be defined, any quantitative analysis that assumes multiple, concurrent construction projects would be speculative. Construction-period noise for the Revised Mixed Use Project and each of the 23 related projects (that have not already been built), as with the prior proposal analyzed in the Draft EIR, would be localized. In addition, it is likely that each of the related projects would have to comply with the local noise ordinance, as well as mitigation measures that may be prescribed pursuant to CEQA provisions that require significant impacts to be reduced to the extent feasible.

The nearest related projects to the Revised Mixed Use Project include multi-family residential projects along Glencoe Avenue. If these projects were to be constructed concurrently, areas east of the proposed site of the Revised Mixed Use Project, as with the prior proposal analyzed in the Draft EIR, may experience construction-noise levels well above ambient noise levels. Although the Revised Mixed Use Project, as was the case with the prior proposal analyzed in the Draft EIR, would not result in significant impacts at any of residential uses that are located along Glencoe Avenue, it is assumed that in combination with these related projects, it is conservatively concluded that a cumulative significant construction-period noise impact at these residential receiver locations could occur. In addition, recirculation is not required under CEQA Guidelines 15088.5 since there would be no new or no more substantially severe adverse cumulative construction noise impacts than what was identified in the Draft EIR.

#### **Operation**

Each of the 23 related projects that have been identified within the general Project vicinity would generate stationary-source and mobile-source noise due to ongoing day-to-day

operations. The related projects are of a residential, retail, commercial, or institutional nature and these uses are not typically associated with excessive exterior noise; however, each project would produce traffic volumes that are capable of generating a roadway noise impact.

Traffic and composite cumulative noise levels would result in a maximum increase of 1.7 dBA CNEL. This noise level increase is well below the 3-dBA CNEL significance threshold. As such, similar to the prior proposal analyzed in the Draft EIR, roadway noise and composite noise impacts due to cumulative traffic volumes and Revised Mixed Use Project operations would be less than significant.

Due to Los Angeles Municipal Code provisions that limit stationary-source noise from items such as roof-top mechanical equipment and emergency generators, noise levels would be less than significant at the property line for each related project. Similar to the prior proposal analyzed in the Draft EIR, it is unlikely that on-site noise produced by any related project would be additive to noise levels, attributable to the Revised Mixed Use Project, due to the distance between the site of the Revised Mixed Use Project and these related projects. As such, stationary-source noise impacts attributable to cumulative development, as with the prior proposal analyzed in the Draft EIR, would be less than significant. Furthermore, the Revised Mixed Use Project would not result in a new significant cumulative impact nor a substantial increase in the severity of a significant cumulative operational noise impact as compared to what was identified in the Draft EIR. Thus, recirculation is not required pursuant to CEQA Guidelines Section 15088.5.

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## II. ENVIRONMENTAL ANALYSIS OF THE REDUCED PROJECT

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### A. PROJECT DESCRIPTION

#### 1. Introduction and Conclusion

The analysis that follows evaluates the environmental impacts of the Revised Mixed Use Project with the proposed reduction in the number of residential units in comparison to those of the Mixed Use Project as analyzed in the Draft EIR. Following a description of the Revised Mixed Use Project, an analysis of the comparative environmental impacts is provided for each issue addressed within Section IV, Environmental Impact Analysis, of the Draft EIR. The comparative environmental analysis concludes that the Revised Mixed Use Project is a refinement of the Mixed Use Project analyzed in the Draft EIR and that the proposed reduction in the number of residential units does not result in any new significant impacts or a worsening of a significant impact identified in the Draft EIR.

#### 2. Overview of the Project with Refinements

The proposed refinements represent an overall reduction in the number of residential units that would be constructed as part of the Mixed Use Project. The Mixed Use Project as analyzed in the Draft EIR consisted of 398,700 square feet of total floor area (residential and commercial), including 310 residential units and 9,000 square feet of retail floor area. The Project as analyzed in the Draft EIR also included the inclusion of two adjacent parcels for which the City is initiating a Community Plan and Zone Change to promote a consistent pattern of land use designations on and around the Project Site. In comparison, the Revised Mixed Use Project consists of 345,000 square feet of total floor area (residential and commercial), including 244 residential units, and 9,000 square feet of commercial uses. This represents a 13 percent reduction in total floor area and a 21 percent reduction in the number of total residential units. The Revised Mixed Use Project retains the 9,000 square feet of retail floor area as proposed and analyzed in the Draft EIR. The Revised Mixed Use Project also includes the two parcels that comprise the Add Area for which the City is initiating a Community Plan Amendment and Zone Change as proposed and analyzed in the Draft EIR.

The Revised Mixed Use Project would feature the same amenities as the Mixed Use Project as analyzed in the Draft EIR including a community meeting room, a swimming pool and/or spa, and an exercise room. A conceptual site plan of the Revised Mixed Use Project is presented in Figure 1 on page 36.

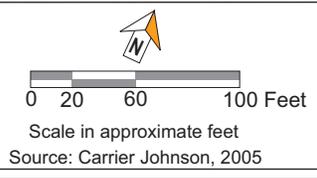


Figure 1  
Revised Mixed Use Project-  
Conceptual Site Plan

The architectural character of the Revised Mixed Use Project would be comparable to that which was analyzed in the Draft EIR. Interior and exterior landscaping, as well as lighting to add decorative highlights to the building façade would also be the same as described in the Draft EIR. The main variation in the design of the Revised Mixed Use Project is the reduced building heights. Under the Revised Mixed Use Project, building heights along the Marina Freeway and Lincoln Boulevard frontages would be reduced from 70 feet to approximately 55 feet. The height of the buildings along the Maxella Avenue frontage would be 67 feet in height. Building elevation drawings illustrating the reduced building heights along the Lincoln Boulevard and Maxella Avenue frontages are presented in Figure 2 on page 38.

## **B. ENVIRONMENTAL ANALYSIS OF INDIVIDUAL ISSUES**

### **1. Summary Comparison of the Reduced Project to Original Project**

Subsequent to the close of the Draft EIR public review period, the Applicant of the Mixed Use Project voluntarily reduced the number of residential units proposed for development. While the number of residential units has been reduced from 310 to 244, no changes are proposed relative to the Add Areas.

An analysis has been completed evaluating the comparative environmental impacts of the Revised Mixed Use Project in relation to the Mixed Use Project as analyzed in the Draft EIR. The purpose of this analysis is to determine if the Revised Mixed Use Project results in any new significant impacts or whether the significant impacts of the Mixed Use Project as analyzed in the Draft EIR would be substantially worsened with the Revised Mixed Use Project. The analysis that follows concludes that the Revised Mixed Use Project would not result in any new significant impacts or substantially worsen any of the significant impacts of the Mixed Use Project as analyzed in the Draft EIR. In fact, the analysis indicates that the significant traffic impacts attributable to the Mixed Use Project as analyzed in the Draft EIR are eliminated with the Revised Mixed Use Project. As no changes are proposed relative to the Add Areas, the analyses of the Add Areas as presented in the Draft EIR remain valid, and no changes to the analyses are needed or required.

A comparison of the impacts of the Revised Mixed Use Project to the Mixed Use Project as analyzed in the Draft EIR is summarized for all issue areas in Table 1 on page 39.



Lincoln Boulevard Elevation



Maxella Avenue Elevation



Figure 2  
Conceptual Elevations-  
Lincoln Boulevard and Maxella Avenue Frontages

**Table 1**

**COMPARISON OF IMPACTS IDENTIFIED IN THE DRAFT EIR  
FOR ORIGINAL MIXED USE PROJECT AND  
IMPACTS RELATED TO MIXED USE PROJECT WITH REFINEMENTS**

Impact Area	Comparison of Impact	Significance After Mitigation	
		Original Project	Reduced Project
<b>Land Use</b>			
Regulatory Framework	Similar	Consistent	Consistent
Land Use Compatibility	Similar	Not Significant	Not Significant
<b>Visual Resources</b>			
Visual Quality	Similar	Not Significant	Not Significant
Views	Similar	Not Significant	Not Significant
<b>Traffic, Circulation and Parking</b>			
Traffic/Circulation	Less	Significant and Unavoidable	Not Significant
Parking	Similar	Not Significant	Not Significant
<b>Air Quality</b>			
Construction	Similar	Not Significant	Not Significant
Operational	Less	Not Significant	Not Significant
<b>Noise</b>			
Construction	Similar	Significant and Unavoidable	Significant and Unavoidable
Operational	Less	Not Significant	Not Significant

*Source: PCR Services Corporation.*

**2. Issue-by-Issue Comparison of the Reduced Project to the Original Project**

**a. Land Use**

The Revised Mixed Use Project would involve the development of the same types of on-site land uses. As such, the proposed Community Plan amendment and Zone Change would also be required to implement the Revised Mixed Use Project. As is the case with the Mixed Use Project as analyzed in the Draft EIR, the reduced Mixed Use Project would require amending the Community Plan and zoning designations for the site from Industrial—Limited Manufacturing and M1-1, to General Commercial and RAS4, respectively.

The Mixed Use Project as analyzed in the Draft EIR consisted of development of four to six story buildings with maximum building heights of approximately 45 feet to 70 feet and a floor area ratio (FAR) of 2.27.<sup>4</sup> In comparison, the Revised Mixed Use Project consists of

<sup>4</sup> *The Mixed Use Project as analyzed in the Draft EIR contains 398,700 sq.ft. on a 4.04-acre site (398,700 ÷ [4.04 x 43,560] = 2.27).*

four-story buildings with maximum building heights of approximately 55 feet to 67 feet and a floor area ratio (FAR) of 1.93.<sup>5</sup> As is the case with the Mixed Use Project analyzed in the Draft EIR, the Applicant is requesting a height district change to Height District 2, as the Revised Mixed Use Project's FAR exceeds the 1.5:1 limit for development within Height District 1. As Height District 2 allows a FAR of 6:1, the Revised Mixed Use Project would be consistent with the requested Height District. The proposed heights and FAR of the Revised Mixed Use Project are in keeping with the Project location and uses in the vicinity.

As is the case with the Mixed Use Project analyzed in the Draft EIR the interface of physical and operational characteristics of the Revised Mixed Use Project would not substantially conflict with the surrounding land uses. Furthermore, the Revised Mixed Use Project would be the redevelopment of an existing site, and would occur within a portion of a large land area defined by existing roadways. The site uses would not have adverse affects on adjacent uses, and would allow them to operate as before. The commercial uses on Maxella Avenue would be in keeping with the existing commercial character of that street. The mid-rise residential development would be in keeping with the types of residential development occurring along Lincoln Boulevard. Further, the Revised Mixed Use Project would not result in the division, disruption or isolation of an existing established community or neighborhood. Impacts regarding the surrounding uses would be less than significant.

The Draft EIR cumulative impact analysis noted that the Mixed Use Project would not combine with any of the related projects to cause an effect that would be incompatible with the existing land use plans, policies and regulations intended to prevent an impact to the environment. Therefore, the Mixed Use Project was concluded not to contribute to significant cumulative impacts within the established planning horizon. Given that the Revised Mixed Use Project decreases the total number of residential units at the Project site, the Revised Mixed Use Project would also result in cumulative impacts associated with applicable land use plans and policies that are less than significant.

#### **b. Visual Resources**

The Draft EIR concludes that the development of the Mixed Use Project would result in less than significant visual quality impacts with the incorporation of the identified Project Design Features. In addition, the mitigation measures identified in the Draft EIR would further reduce the Mixed Use Project's less than significant impacts and ensure that the proposed Mixed Use Project, as analyzed in the Draft EIR, would be in scale with the surrounding area and with the City of Los Angeles Urban Design policies and signage regulations. The Draft EIR also concludes that the proposed structures would not obstruct a view of a valued view resource from

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<sup>5</sup> *The reduced Mixed Use Project contains 339,828 sq.ft. on a 4.04-acre site ( $339,828 \div [4.04 \times 43,560] = 1.93$ ).*

any public or private vantage points. Under the Revised Mixed Use Project, the building heights would be reduced from approximately 70 feet, as analyzed in the Draft EIR, to 55 feet along the Marina Freeway and Lincoln Boulevard frontages and 67 feet along the Maxella Avenue frontage. The Revised Mixed Use Project would incorporate all of the design features and the mitigation measures identified in the Draft EIR. Therefore, the visual quality and views impact of the Revised Mixed Use Project would be similar, due to the minor reduction in building height. As such, the Revised Mixed Use Project, consistent with the conclusions in the Draft EIR, would result in an impact that is less than significant with regard to visual resources.

The Draft EIR cumulative impact analysis noted that there are no projects planned or under construction in the immediate vicinity of the Project site, and no projects that would change the analysis of visual resource impacts. Therefore, consistent with the conclusion in the Draft EIR, the Revised Mixed Use Project would result in a cumulative impact upon aesthetic resources or views that is less than significant.

### **c. Traffic, Circulation, and Parking**

The proposed Mixed Use Project as analyzed in the Draft EIR was expected to generate a net increase of approximately 124 trips during the morning peak hour and 129 trips during the afternoon peak hour. With the proposed reduction in the number of residential units, the number of morning and afternoon trips generated by the Revised Mixed Use Project would be approximately 15 percent less than the projected growth in trip generation analyzed in the Draft EIR. The Draft EIR concluded that the proposed Mixed Use Project would create significant traffic impacts at the Glencoe Avenue and Washington Boulevard intersection and Lincoln Boulevard and Maxella Avenue intersection during the afternoon peak hours under cumulative plus Mixed Use Project conditions. A traffic analysis was conducted to determine the impacts of the Revised Mixed Use Project. This analysis, as presented in Appendix A of this Final EIR, concludes that the development of the Revised Mixed Use Project would result in impacts that are less than significant at all 11 analyzed intersections. Therefore, the reduction in residential units under the Revised Mixed Use Project is sufficient to eliminate the significant traffic impacts, after mitigation, that are identified in the Draft EIR.

As the number of trips generated by the Revised Mixed Use Project are reduced in comparison to the forecasts presented in the Draft EIR, the Revised Mixed Use Project, as is the case with the Mixed Use Project, as analyzed in the Draft EIR, would result in impacts that are less than significant with regard to the CMP, impacts on neighborhood streets, Project access, and public transit.

Despite the reduction in the number of residential units under the Revised Project, peak construction activities would be the same, with the change being a potential reduction in the

duration of the construction period. As such, the Revised Mixed Use Project, as is the case with the Mixed Use Project as analyzed in the Draft EIR, would result in impacts that are less than significant on traffic during construction.

The proposed Mixed Use Project's residential and commercial uses as analyzed in the Draft EIR would require a total of 609 parking spaces. The development of the Revised Mixed Use Project would, therefore, require fewer spaces. As such, the Revised Mixed Use Project would provide a total of 594 parking spaces. As the parking supply included within the Revised Mixed Use Project would exceed both the LAMC requirements and the Revised Mixed Use Project's parking demand, the parking impacts of the Revised Mixed Use Project would be less than significant.

The analysis of cumulative traffic impacts, as presented in the Draft EIR, concluded that cumulative development would result in four intersections operating at LOS E or F during the morning peak hour, while six of these intersections are also expected to operate at unacceptable Levels of Service during the afternoon peak hour. Since no guarantee exists that mitigation measures would be implemented with the identified related projects, it is conservatively concluded in the Draft EIR that cumulative development would yield a significant cumulative traffic impact on intersection operations. As cumulative conditions are unchanged under the Revised Mixed Use Project, the cumulative impact of the Revised Mixed Use is also concluded to yield a significant cumulative traffic impact on intersection operations.

#### **d. Air Quality**

On a regional basis, the Revised Mixed Use Project would produce less operational emissions on a year-to-year basis due to the fewer number of residential units. Operational emissions produced by all stationary sources would be reduced by 15 to 20 percent. The net regional emissions attributable to the proposed Mixed Use Project as analyzed in the Draft would not exceed regional SCAQMD thresholds for ROC, NO<sub>x</sub>, SO<sub>x</sub>, CO, or PM<sub>10</sub>. Development of the proposed Mixed Use Project, as analyzed in the Draft EIR, would also result in impacts on local CO concentrations and releases of TAC emissions that are less than significant and would be consistent with the SCAQMD's AQMP and the City's General Plan. Therefore, under the Revised Mixed Use Project impacts associated with these pollutants would be reduced, due to the reduction in on-site residential units and, thus, are also concluded to be less than significant.

The construction of the Mixed Use Project as analyzed in the Draft EIR would result in regional ROC and NO<sub>x</sub> emissions that exceed the SCAQMD regional daily significance threshold. Mitigation measures would serve to reduce ROC emissions during construction of the Mixed Use Project, as analyzed in the Draft EIR, to a level that is less than significant.

The Revised Mixed Use Project, as is the case with the Mixed Use Project as analyzed in the Draft EIR, would result in a significant short-term regional impact during construction (see analysis below). All of the mitigation measures identified in the Draft EIR would be applicable to the Revised Mixed Use Project. As such, the Revised Mixed Use Project, as is the case with the Mixed Use Project, as analyzed in the Draft EIR, would result in a significant regional impact, after mitigation, with regard to NO<sub>x</sub> emissions.

As peak construction activities under the Revised Mixed Use Project would be the same as those incorporated into the Draft EIR's construction air quality analysis, the Revised Mixed Use Project would also have impacts that are less than significant with regard to localized construction emissions and emissions of toxic air contaminants.

Construction of related projects and other development consistent with local and regional plans would potentially create significant construction air quality impacts, especially on peak construction days. Even though the Revised Mixed Use Project is anticipated to occur during a shorter relative construction period than the Mixed Use Project as analyzed in the Draft EIR (and therefore less overall emissions), peak day emissions would contribute to significant cumulative impacts whenever other projects are concurrently under construction.

While the Revised Mixed Use Project, as is the case with the Mixed Use Project as analyzed in the Draft EIR, would be consistent with the growth assumptions of the current Air Quality Management Plan (AQMP), the Revised Mixed Use Project, as is the case with the Mixed Use Project as analyzed in the Draft EIR, would result in a significant short-term regional impact during construction (see analysis below). Therefore, the Revised Mixed Use Project, as was the case with the Mixed Use Project, is concluded to contribute to a cumulatively significant air quality impact.

#### **e. Noise**

Project development, as analyzed in the Draft EIR, would result in less than significant off-site noise impacts during long-term operations. With the reduction in vehicle trips under the Revised Mixed Use Project, these conclusions would also apply to the Revised Mixed Use Project. Furthermore, mitigation measures identified in the Draft EIR would reduce interior noise levels within each residential dwelling unit to meet adopted City standards. Therefore, as the Revised Mixed Use Project would incorporate all of the mitigation measures identified in the Draft EIR, potential impacts with respect to community noise levels relative to the Revised Mixed Use Project would also be less than significant.

Under the Mixed Use Project, as analyzed in the Draft EIR, construction-related noise level increase would exceed the 5-dBA significance criterion at the Marriott Hotel property. The

8-foot temporary sound barrier and acoustic linings prescribed in Mitigation Measure E-1 in the Draft EIR can achieve barrier insertion losses of approximately 6 dBA and 15 dBA, respectively, or more in areas where the line of sight between construction-period noise sources and off-site receiver locations is obstructed. Assuming a minimum noise reduction of 6 dBA, the worst-case construction-period  $L_{eq}$  would be reduced to approximately 80 dBA at areas along the adjoining property line with the Marriott Hotel property, which is still 21.9 dBA above the baseline ambient noise level. Average  $L_{eq}$  noise levels during construction within the Marriott Hotel property would continue to exceed the ambient noise level by more than the 5-dBA significance criterion. As with the Mixed Use Project analyzed in the Draft EIR, even though the reduced Mixed Use Project would incorporate the mitigation measure identified in the Draft EIR, this impact is concluded to be significant and unavoidable.

Cumulative impacts upon the five off-site receiver locations evaluated in the Draft EIR analysis would be a function of additional noise generated by related projects and overall off-site development in the vicinity of the Project site. Such other development would be subject to the requirements of all applicable noise ordinances. Cumulative contributions of the Revised Mixed Use Project would be the same as the Mixed Use Project as analyzed in the Draft EIR and would therefore also be less than significant.

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### III. MITIGATION MONITORING AND REPORTING PROGRAM

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#### 1. INTRODUCTION

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared in accordance with Section 21081.6 of the Public Resources Code and Section 15097 of the CEQA Guidelines, which require adoption of a Mitigation Monitoring and Reporting Program for all projects for which an Environmental Impact Report or Mitigated Negative Declaration has been prepared. Specifically, Section 21081.6 of the Public Resources Code states: "...the [lead] 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 program]... shall be designed to ensure compliance during project implementation." The City of Los Angeles, Department of City Planning is the Lead Agency for the proposed Project.

The MMRP describes the procedures for the implementation of all of the mitigation measures identified in the EIR for the proposed Project. It is the intent of the MMRP to: (1) verify satisfaction of the required mitigation measures of the EIR; (2) provide a methodology to document implementation of the required mitigation; (3) provide a record of the Monitoring Program; (4) identify monitoring responsibility; (5) establish administrative procedures for the clearance of mitigation measures; (6) establish the frequency and duration of monitoring; and (7) utilize existing review processes where feasible.

The MMRP lists mitigation measures according to the same numbering system contained in the Draft EIR sections. Each mitigation measure is categorized by topic, with an accompanying discussion of the following:

- The enforcement agency (i.e., the agency with the authority to enforce the mitigation measure);
- The monitoring agency (i.e., the agency to which mitigation reports involving feasibility, compliance, implementation, and development operation are made).
- The phase of the project during which the mitigation measure should be monitored (i.e., prior to issuance of a building permit, construction, or occupancy);
- The monitoring frequency and duration of monitoring and reporting (i.e., once at site plan review or monthly during construction); and

- The administrative procedures for the clearance of mitigation measures (i.e., Approval of Site Plan or Monthly Statements of Compliance).

The Applicant shall be obligated to demonstrate that compliance with the required mitigation measures has been effected. All departments listed below are within the City of Los Angeles unless otherwise noted. The entity responsible for the implementation of all mitigation measures shall be the Applicant unless otherwise noted.

**a. Land Use**

No land use mitigation measures are identified in the EIR.

**b. Visual Qualities**

**Mitigation Measure B-1** The Applicant shall ensure, through appropriate postings and daily visual inspections, that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways, and that any such temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period.

**Enforcement Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Phase:** Construction

**Monitoring Frequency:** Monthly during construction

**Action Indicating Compliance with Mitigation Measure(s):** Monthly Statements of Compliance

**Mitigation Measure B-2** Building façades facing public streets shall be designed to enhance the pedestrian experience and connectivity with adjacent uses.

**Enforcement Agency:** City of Los Angeles, Department of City Planning

**Monitoring Agency:** City of Los Angeles, Department of City Planning

**Monitoring Phase:** Pre-construction

**Monitoring Frequency:** Once at site plan review

**Action Indicating Compliance with Mitigation Measure(s):** Approval of site plans

**Mitigation Measure B-3** New utilities shall be constructed underground, to the extent feasible.

**Enforcement Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Phase:** Pre-construction

**Monitoring Frequency:** Once at site plan review

**Action Indicating Compliance with Mitigation Measure(s):** Approval of site plans

**Mitigation Measure B-4** Exterior signage for the proposed buildings shall be compatible with the design of the proposed building.

**Enforcement Agency:** City of Los Angeles, Department of City Planning

**Monitoring Agency:** City of Los Angeles, Department of City Planning

**Monitoring Phase:** Pre-construction

**Monitoring Frequency:** Once at site plan review

**Action Indicating Compliance with Mitigation Measure(s):** Approval of site plans

**Mitigation Measure B-5** All new or replacement street trees shall be selected for consistency with the existing street trees or in accordance with a street tree master plan reviewed and approved by the Department of Public Works Street Tree Division.

**Enforcement Agency:** Los Angeles City, Department of City Planning; Bureau of Street Maintenance, Street Tree Division

**Monitoring Agency:** Los Angeles City, Department of City Planning; Bureau of Street Maintenance, Street Tree Division

**Monitoring Phase:** Pre-construction; construction

**Monitoring Frequency:** Once at issuance of Building permit; once at site plan review

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of Building permits; approval of site plans

**Mitigation Measure B-6** All mechanical, electrical and rooftop equipment shall be screened from view from adjacent surface streets.

**Enforcement Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Phase:** Pre-construction

**Monitoring Frequency:** Once at site plan review

**Action Indicating Compliance with Mitigation Measure(s):** Approval of site plans

**Mitigation Measure B-7** Landscaping and/or vegetation features shall be incorporated into the design of the site of the Mixed Use Project.

**Enforcement Agency:** City of Los Angeles, Department of City Planning; Bureau of Street Maintenance, Street Tree Division

**Monitoring Agency:** City of Los Angeles, Department of City Planning; Bureau of Street Maintenance, Street Tree Division

**Monitoring Phase:** Pre-construction, construction

**Monitoring Frequency:** Once at site plan review

**Action Indicating Compliance with Mitigation Measure(s):** Approval of site plans

**Mitigation Measure B-8** All exterior lighting shall be directed on-site or shielded to limit light spillover effects.

**Enforcement Agency:** City of Los Angeles, Department of City Planning

**Monitoring Agency:** City of Los Angeles, Department of City Planning

**Monitoring Phase:** Pre-construction, construction

**Monitoring Frequency:** Once at site plan review

**Action Indicating Compliance with Mitigation Measure(s):** Approval of site plans

### c. Traffic Circulation and Parking

**Mitigation Measure C-1** Prior to the issuance of any building or grading permit for the Mixed Use Project, construction traffic management plans, including street closure information, detour plans, haul routes, and staging plans, shall be prepared, satisfactory to LADOT. All construction contracts shall include provisions requiring compliance with the approved construction traffic management plans.

**Enforcement Agency:** City of Los Angeles, Department of Transportation; City of Los Angeles, Department of Public Works.

**Monitoring Agency:** City of Los Angeles, Department of Transportation; City of Los Angeles, Department of Building and Safety

**Monitoring Phase:** Pre-construction, construction

**Monitoring Frequency:** Once at execution of construction contract; monthly during construction

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of any permit for the Project; and evidence these provisions are included in construction contracts; and monthly statements of compliance

**Mitigation Measure C 2** All haul truck travel through the City of Culver City shall occur along City of Culver City approved haul routes and occur during City of Culver City approved operating hours.

**Enforcement Agency:** City of Los Angeles, Department of Transportation

**Monitoring Agency:** City of Los Angeles, Department of Transportation

**Monitoring Phase:** Construction

**Monitoring Frequency:** Once at execution of construction contract; monthly during construction

**Action Indicating Compliance with Mitigation Measure(s):** Execution of construction contract with mitigation measure provisions; monthly statements of compliance

#### d. Air Quality

##### Construction

**Mitigation Measure D-1** All land clearing/earth-moving activity areas shall be watered to control dust as necessary to remain visibly moist during active operations.

**Enforcement Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Phase:** Construction

**Monitoring Frequency:** Ongoing during construction

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of grading or building permits

**Mitigation Measure D-2** Water three times daily or non-toxic soil stabilizers shall be applied, according to manufacturers' specifications, as needed to reduce off-site transport of fugitive dust from all unpaved staging areas and unpaved road surfaces.

**Enforcement Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Phase:** Construction

**Monitoring Frequency:** Ongoing during construction

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of grading or building permits

**Mitigation Measure D-3** Streets shall be swept as needed during construction, but not more frequently than hourly, if visible soil material has been carried onto adjacent public paved roads.

**Enforcement Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Phase:** Construction

**Monitoring Frequency:** Ongoing during construction

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of grading or building permits

**Mitigation Measure D-4** Construction equipment shall be visually inspected prior to leaving the site and loose dirt shall be washed off with wheel washers as necessary.

**Enforcement Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Phase:** Construction

**Monitoring Frequency:** Ongoing during construction

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of grading or building permits

**Mitigation Measure D-5** Traffic speeds on all unpaved roads shall not exceed 15 MPH.

**Enforcement Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Phase:** Construction

**Monitoring Frequency:** Ongoing during construction

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of grading or building permits

**Mitigation Measure D-6** All construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

**Enforcement Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Phase:** Pre-construction, construction

**Monitoring Frequency:** Ongoing during construction

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of grading or building permits

**Mitigation Measure D-7** General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues will have their engines turned off when not in use, to reduce vehicle emissions. Construction activities should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.

**Enforcement Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Phase:** Construction

**Monitoring Frequency:** Ongoing during construction

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of grading or building permits

**Mitigation Measure D-8** To the extent possible, petroleum powered construction equipment shall utilize electricity from power poles rather than temporary diesel power generators and/or gasoline power generators.

**Enforcement Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Phase:** Construction

**Monitoring Frequency:** Ongoing during construction

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of grading or building permits

**Mitigation Measure D-9** On-site mobile construction equipment shall be powered by alternative fuel sources (i.e., methanol, natural gas, propane or butane) as feasible.

**Enforcement Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Phase:** Construction

**Monitoring Frequency:** Ongoing during construction

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of grading or building permits

**Mitigation Measure D-10** All contractors shall be required to participate in a common carpool registry which provides a list of construction workers willing to carpool and home locations during all periods of Mixed Use Project construction.

**Enforcement Agency:** City of Los Angeles, Department of City Planning

**Monitoring Agency:** City of Los Angeles, Department of City Planning

**Monitoring Phase:** Construction

**Monitoring Frequency:** Ongoing during construction

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of grading or building permits

## **Operations**

No operational Air Quality mitigation measures are identified in the EIR.

## **e. Noise**

### **Construction Noise**

**Mitigation Measure E-1** An 8-foot-high temporary sound barrier (e.g., solid wood fence) shall be erected between the property line of the Mixed Use project and the Marriott Hotel property; and an acoustical lining shall be affixed to the exterior scaffolding apparatus such that, to the greatest extent feasible, the line of site between the Marriott Hotel property and the site of the Mixed Use Project's construction activity is blocked.

**Enforcement Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Phase:** Pre-construction, construction

**Monitoring Frequency:** Ongoing during construction

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of grading or building permits

## Operational Noise

**Mitigation Measure E-2:** All exterior walls and floor-ceiling assemblies within the Mixed Use Project (unless within a residential unit) that face Lincoln Boulevard or the Marina Freeway shall be constructed with double-paned glass or an equivalent and in a manner to provide an airborne sound insulation system achieving a Sound Transmission Class of 50 (45 if field tested) as defined in the UBC Standard No. 35-1, 1982 edition. Advisory Agency sign-off shall be required prior to the issuance of building permit for the Mixed Use Project. The Applicant, as an alternative, may retain an engineer registered in the State of California with expertise in acoustical engineering, who shall submit a signed report for an alternative means of sound insulation satisfactory to the Advisory Agency which achieves a maximum interior noise of CNEL 45 (residential standard).

**Enforcement Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Phase:** Pre-construction

**Monitoring Frequency:** Once at issuance of building permit

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of building permit

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## **IV. CORRECTIONS AND ADDITIONS TO THE DRAFT EIR**

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### **INTRODUCTION**

Corrections and Additions to the Draft EIR are a function of the public comments received on the Draft EIR during the public review period, November 4, 2004, through December 20, 2004. Where public comments resulted in additional study or modification of information contained in the Draft EIR, this information is presented as a Correction and Addition to the Draft EIR. The Corrections and Additions section provides a means by which all the corrections and changes in the Draft EIR are presented in a one place in the same chronological format as the Draft EIR. The Corrections and Additions sections begin with the Draft EIR Executive Summary then present the range of environmental topics and alternatives in the same order as in the Draft EIR. None of the Corrections and Additions results in conclusions of significance, not previously identified in the Draft EIR.

### **I. EXECUTIVE SUMMARY**

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

### **II. PROJECT DESCRIPTION**

III.B.1 Section II.B, Figure 2, Aerial View of the Project Site and Surrounding Uses, page 38; replace with the figure presented on page 55.

### **III.A. OVERVIEW OF ENVIRONMENTAL SETTING**

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

### **III.B. IDENTIFICATION OF RELATED PROJECTS**

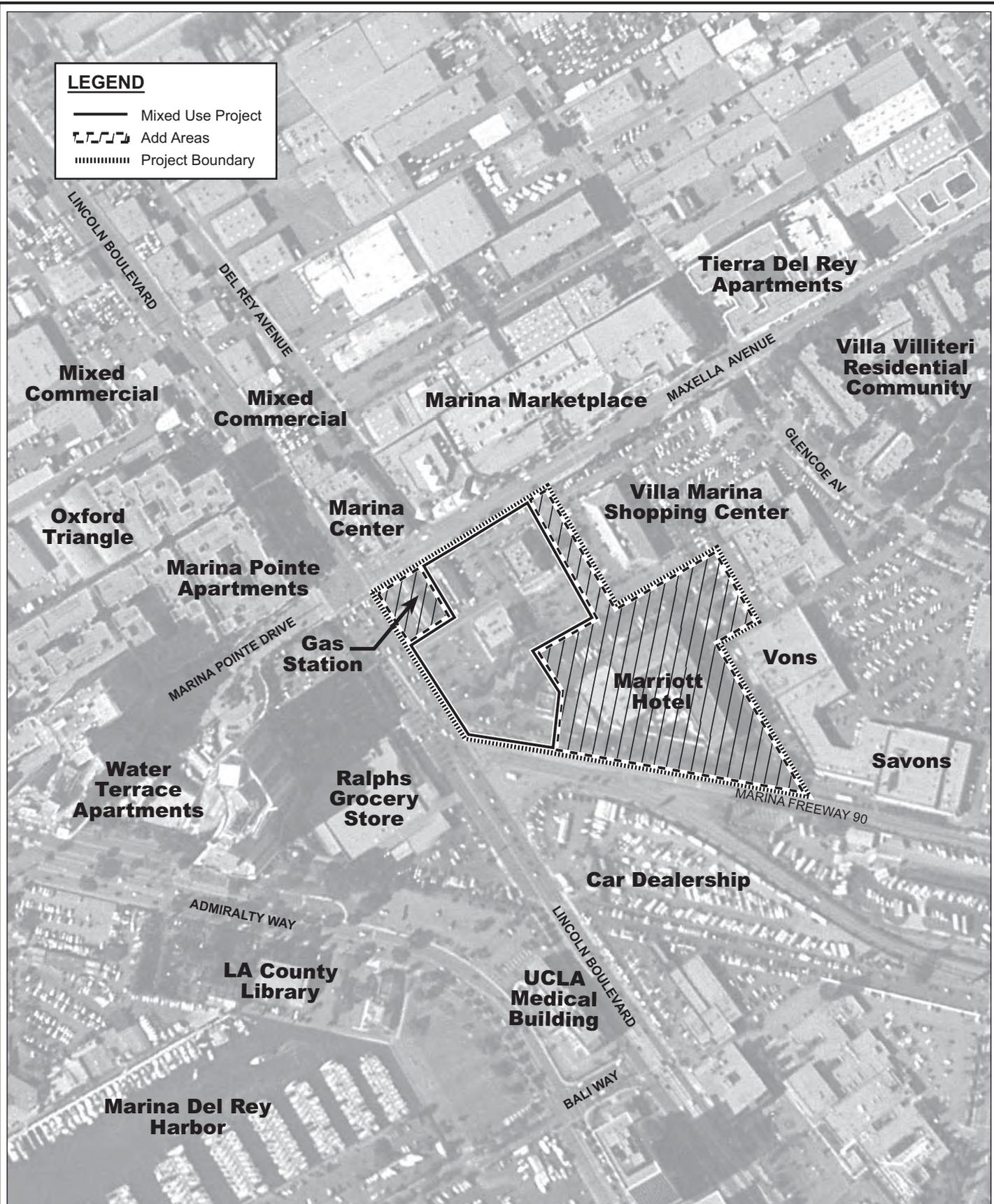
There are no corrections or additions to this section of the Draft EIR.

### **IV.A. LAND USE**

IV.A.1 Section IV.A.2.a.(3), Figure 10, Surrounding Land Uses, page 61; replace with the figure presented on page 56.

**LEGEND**

- Mixed Use Project
- ▨ Add Areas
- ▤ Project Boundary

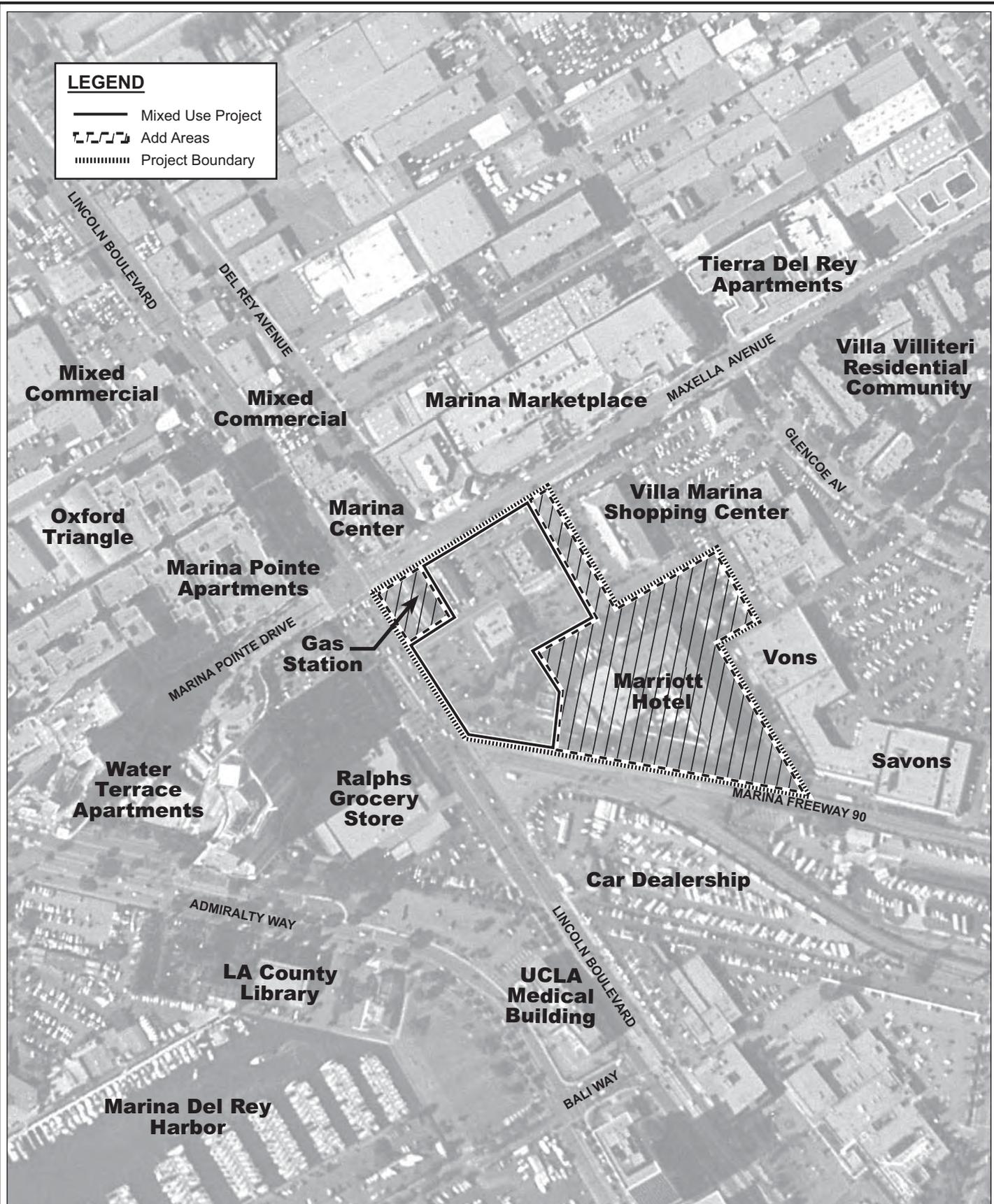


Revised Figure 2  
Aerial View of Project Site  
and Surrounding Uses

Source: Landiscor, Photo Date October 2003

**LEGEND**

- Mixed Use Project
- ▨ Add Areas
- ▤ Project Boundary



Revised Figure 10  
Surrounding Land Uses

Source: Landiscor, Photo Date October 2003

## IV.B. VISUAL RESOURCES

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

## IV.C. TRAFFIC, CIRCULATION AND PARKING

IV.C.1 Section IV.C.3.c(7), Mixed Use Project Impacts on Public Transit, page 129; replace “seven” with “eight” in three sentences within the first paragraph.

IV.C.2 Section IV.C.5, Mitigation Measures, page 132; replace Mitigation Measure C-1 with the following:

**“Mitigation Measure C-1** Prior to the issuance of any building or grading permit for the Mixed Use Project, construction traffic management plans, including street closure information, detour plans, haul routes, and staging plans shall be prepared, satisfactory to LADOT. All construction contracts shall include provisions requiring compliance with the approved construction traffic management plans.”

IV.C.3 Section IV.C.5, Mitigation Measures, page 132; replace Mitigation Measure C-2 with the following:

**“Mitigation Measure C-2** All haul truck travel through the City of Culver City shall occur along City of Culver City approved haul routes and occur during City of Culver City approved operating hours.”

## IV.D. AIR QUALITY

IV.D.1 Section IV.D.5, Mitigation Measures, page 165; add the following mitigation measure:

**“Mitigation Measure D-10** All contractors shall be required to participate in a common carpool registry which provides a list of construction workers willing to carpool and home locations during all periods of Mixed Use Project construction.”

**IV.E. NOISE**

**IV.E.1** Section IV.E.1.c(1), Figure 21, Noise Sensitive Receptors and Measurement Locations, page 174; replace with the figure presented on page 59.

**V. ALTERNATIVES TO THE PROPOSED PROJECT**

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

**VI. GROWTH-INDUCING IMPACTS**

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

**VII. SIGNIFICANT IRREVERSIBLE IMPACTS**

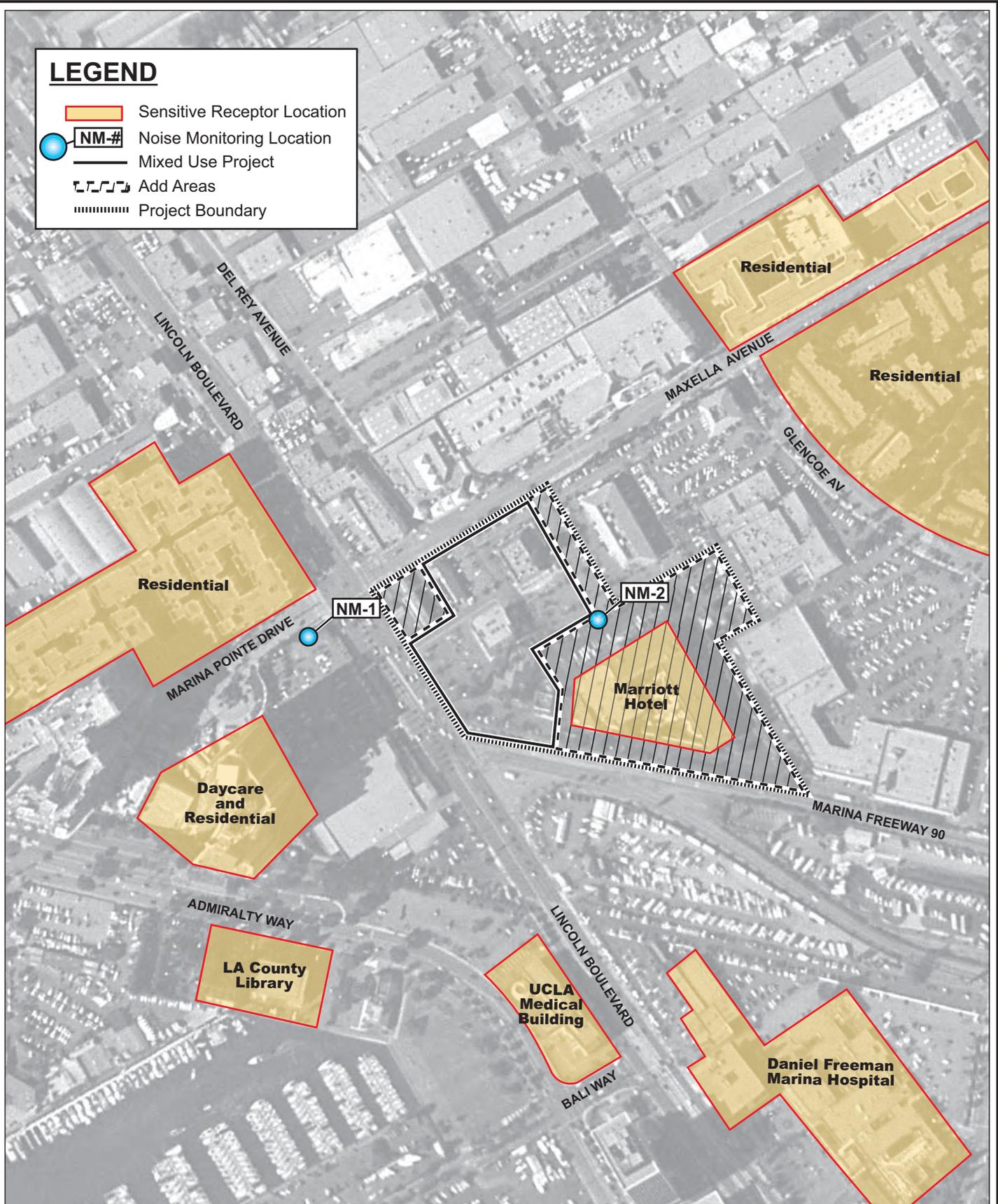
There are no corrections or additions to this section of the Draft EIR.

**VIII. ORGANIZATIONS AND PERSONS CONTACTED**

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

**LEGEND**

-  Sensitive Receptor Location
-  Noise Monitoring Location
-  Mixed Use Project
-  Add Areas
-  Project Boundary



Revised Figure 21  
Noise Sensitive Receptors  
and Measurement Locations

Source: Landiscor, Photo Date October 2003

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## V. RESPONSES TO WRITTEN COMMENTS

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### A. INTRODUCTION

CEQA Guidelines Section 15088(a) states that “The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments that were received during the noticed comment period and any extensions and may respond to late comments.” In accordance with these requirements, this Section of the Final EIR provides responses to each of the written comments received regarding the Draft EIR.

**Table 2**  
**Written Comments Summary**

Letter No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	III.A ENVIRONMENTAL SETTING	III.B RELATED PROJECTS	IV.A LAND USE	IV.B VISUAL RESOURCES	IV.C TRAFFIC, CIRCULATION AND PARKING	IV.D AIR QUALITY	IV.E NOISE	V. ALTERNATIVES	VI. GROWTH INDUCING IMPACTS	COMMENTS
1	Adel Hagekhalil Wastewater Engineering Services Division Bureau of Sanitation City of Los Angeles Inter-Departmental Correspondence	●										
2	City of Los Angeles Department of Fire 200 North Main Street Los Angeles, CA 90012	●										
3	Department of Transportation District 7, Office of Public Transportation and Regional Planning IGR/CEQA Branch 120 South Spring Street Los Angeles, CA 90012						●					
4	Southern California Association of Governments 818 West Seventh Street, 12th Floor Los Angeles, CA 90017-3435											Project not regionally significant
5	Los Angeles County Beaches & Harbors 13837 Fiji Way Marina del Rey, CA 90292	●										

**Table 2 (Continued)**  
**Written Comments Summary**

Letter No.	PROJECT DESCRIPTION	III.A ENVIRONMENTAL SETTING	III.B RELATED PROJECTS	IV.A LAND USE	IV.B VISUAL RESOURCES	IV.C TRAFFIC, CIRCULATION AND PARKING	IV.D AIR QUALITY	IV.E NOISE	V. ALTERNATIVES	VI. GROWTH INDUCING IMPACTS	COMMENTS
6	County of Los Angeles Department of Public Works 900 South Fremont Avenue Alhambra, CA 91803-1331					●					
7	Culver City Community Development Department Planning Division 9770 Culver Boulevard Culver City, CA 90232-0507	●	●	●		●	●	●			
8	City of Culver City 9770 Culver Boulevard Culver City, CA 90232-0507	●	●	●		●	●	●			
9	Ross Latimer [no address]					●					
10	Ellen S. Randall for Mr. and Mrs. Wm. A. Randall 4330 Glencoe Avenue, #2 Marina del Rey, CA 90292					●					

**LETTER NO. 1**

Adel Hagekhalil  
Wastewater Engineering Services Division  
Bureau of Sanitation  
City of Los Angeles  
Inter-Departmental Correspondence

**COMMENT NO. 1-1****General Plan Amendment Zone Change For Villa Marina Project**

This is in response to your Notice of Completion of a Draft of an Environmental Impact Report for the General Plan Amendment (from Limited Commercial to General Commercial for the Mixed Use project Site and Add Areas), Zone Change (Mixed Use Project area from M1 to RAS4 and add Area from M1 to C4), which is located at 13480, 13490 Maxella Avenue, 4350, 4356 Lincoln Boulevard. The Bureau of Sanitation, Wastewater Engineering Services Division (WESD), has conducted a preliminary evaluation of the potential impacts on the wastewater system for the proposed project.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Amount of Unit per Use	Average Daily Flow (GPD)
Multi-family Residence - 1 BR	130/DU	60	7,800
Multi-family Residence - 2 BR	180/DU	190	34,200
Multi-family Residence - 3 BR	230/DU	60	13,800
Retail / Commercial	80/1000GR.SQ.FT.	9,000	720
		Total	56,520

**SEWER AVAILABILITY**

The sewer infrastructure in the vicinity of the proposed project includes an existing 8-inch VCP sewer line in Maxella Avenue, which feeds into a 12-inch sewer line in Washington Boulevard and an 8-inch sewer line in an easement in Marina Freeway, which feed into a 15-inch sewer line in the same easement. The current capacities of the 8-inch, the 12-inch and the 15-inch cannot be determined as gauging data for these lines is not available at this time. The design capacity for the 8-inch sewer lines at d/D of 50% is 256,000 Gallons per Day, and for the 12-inch sewer line at d/D of 50% is 676,000 Gallons per Day and for the 15-inch sewer line at d/D of 50% is 867,000 Gallons per Day.

A final determination for the local lines capacities will be done as part of the permit process and if insufficient capacity exist then the developer will be required to build a secondary line to connect the flow to the nearest lines with sufficient capacity. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the project.

If you have any questions, please call Belal Tamimi of my staff at (323) 342-6254.

**RESPONSE NO. 1-1**

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. The projected wastewater discharge reflects the Mixed Use Project as analyzed in the Draft EIR. Subsequent to the close of the public comment period, the number of residential units was reduced to 244 units with a proposed mix of 20 one-bedroom, 151 two-bedroom, and 73 three-bedroom units. Therefore the projected wastewater discharge for the Revised Mixed Use Project, based on the generation factors presented in the comment, would be 46,570 gallons per day.

It is acknowledged that the ability of the existing sewer lines to convey the Project's sewer flows cannot be determined at this time as current gauging data is not available and that a final determination as to available capacity within the local lines would be done as a part of the permit process. Should sufficient capacity be available, then the Project would simply connect to the existing local sewer lines and no modifications to the existing conveyance system would be required, beyond the connections themselves. In the event that, during the permit process, local sewer lines are found to have insufficient capacity, the Applicant would be required to make necessary improvements to achieve adequate service, per City of Los Angeles Building and Safety Code and Department of Public Works requirements. Should any sewer line construction encroach into the public right-of-way, review and approval by the Los Angeles Department of Transportation (LADOT) would also be required. Construction impacts associated with potential improvements to the wastewater infrastructure system would be localized to the Project site and immediate vicinity, would be completed in conjunction with other site improvements, and would occur over a relatively short-term period. As a result, improvements to the local sewer conveyance system, should they be required, would result in an impact that is less than significant.

**LETTER NO. 2**

City of Los Angeles  
Department of Fire  
200 North Main Street  
Los Angeles, CA 90012

**COMMENT NO. 2-1**

**PROJECT LOCATION**

The area bounded by Lincoln Boulevard, Maxella Avenue, Glencoe Avenue, Mindanao Way, and SR 90 (Marina Freeway), excluding that portion occupied by the Marriot Hotel.

**PROJECT DESCRIPTION**

Demolition of 5 commercial buildings totaling approximately 30,000 square feet and construction of a mixed-use development consisting of 310 residential condominium units and 9,000 square feet of retail space. The area of the site is 4.04 acres.

**RESPONSE NO. 2-1**

The description of the proposed Project reflects the Mixed Use Project as analyzed in the Draft EIR. Subsequent to the close of the public comment period, the number of residential units was reduced to 244 units, a reduction of approximately 21 percent in the total number of residential units. All of the other elements of the Project as described in the comment remain unchanged. For additional information regarding the Revised Mixed Use Project refer to Section II of this Final EIR.

This comment provides an introduction to the specific comments raised by the Commentor and these comments are addressed below in Response to Comment Nos. 2-2 and 2-3.

**COMMENT NO. 2-2**

The following comments are furnished in response to your request for this Department to review the proposed development:

A. Fire Flow

The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and this Department's judgment for needs in the area. In general, the required fire-flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along path of travel. Exception: Dwelling unit travel distance shall be computed to front door of unit.

Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction. Submit plot plans for Fire Department approval of access and fire hydrants.

**RESPONSE NO. 2-2**

As discussed in the Initial Study in Appendix A-1 of the Draft EIR, development of the proposed Project would comply with all applicable provisions of the City of Los Angeles Fire Code (Article 7 of the Los Angeles Municipal Code) to ensure that adequate LAFD access, hydrants, and fire flow requirements would be provided.

Plot Plans would be submitted to the City of Los Angeles Fire Department for approval of access and fire hydrants.

**COMMENT NO. 2-3**

**CONCLUSION**

The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles C. P. C. 19708.

For additional information, please contact Inspector Kathleen White of the Construction Services Unit at (213) 482-6506.

**RESPONSE NO. 2-3**

Development of the proposed Project would comply with all applicable State and local codes and ordinances and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, as cited in the comment.

**LETTER NO. 3**

Department of Transportation  
District 7, Office of Public Transportation and Regional Planning  
IGR/CEQA Branch  
120 South Spring Street  
Los Angeles, CA 90012

**COMMENT NO. 3-1**

We received a copy of the Draft Environmental Impact Report prepared for the proposed Villa Marina mixed-use development project. The project would include demolition of existing structures and construction of 310 residential condominium units, approximately 9,000 square feet of retail space, and space for up to 691 parking spaces. In the spirit of mutual cooperation through build-out of the project, we offer the following comments:

**RESPONSE NO. 3-1**

The description of the proposed Project reflects the Mixed Use Project as analyzed in the Draft EIR. Subsequent to the close of the public comment period the number of residential units was reduced to 244 units, a reduction of approximately 21 percent in the total number of residential units. For additional information regarding the Revised Mixed Use Project refer to Section II of this Final EIR.

This comment provides an introduction to the specific comments raised by the Commentor and these comments are addressed below in Response to Comment Nos. 3-2 through 3-12.

**COMMENT NO. 3-2**

**General Comments**

- The proposed project will adversely affect the nearby highway's performance and increase congestion on the State's transportation facilities. The proposed project will generate additional trips that will utilize State highway facilities that are currently operating beyond acceptable levels. We advise that feasible transportation mitigation measured be considered. This Department is responsible for maintaining the integrity of State highways, hence, our criteria for determining significant impacts supersedes that outlined in the Los Angeles County Congestion Management Program guidelines.

**RESPONSE NO. 3-2**

The traffic analysis for the Revised Mixed Use Project concludes that impacts at all 11 analyzed intersections would be less than significant. As such no mitigation measures are required, including those intersections under Caltrans' jurisdiction.

**COMMENT NO. 3-3**

- Since the project site is adjacent to State right-of-way at the intersection State Route 1 (Lincoln Boulevard) and State Route 90 (Marina Freeway). [G]rading work and construction would potentially impact State property, therefore, an encroachment permit would be required from this Department.

**RESPONSE NO. 3-3**

The Applicant would contact Caltrans to obtain the necessary encroachment permit(s), if construction activities impact the State right-of-way at the intersection of State Route 1 (Lincoln Boulevard) and State Route 90 (Marina Freeway).

**COMMENT NO. 3-4**

We request the proposed project include right-of way impact protections in the form of a minimum dedication to add a deceleration lane from northbound Lincoln Boulevard to Maxella Avenue.

**RESPONSE NO. 3-4**

Consistent with the City of Los Angeles requirements, the Project shall dedicate land along Lincoln Boulevard fronting the Project Site.

**COMMENT NO. 3-5**

- Lincoln Boulevard is classified as a bike route and thus, the proposed project shall provide a bike lane facility within the project limits.

**RESPONSE NO. 3-5**

Consistent with the City of Los Angeles requirements, the Project shall dedicate land along Lincoln Boulevard fronting the Project Site, and the provision of a bike lane facility within this dedication would occur at the discretion of the City of Los Angeles.

**COMMENT NO. 3-6**

- Lincoln Boulevard shall be designed to State Standards within the project limits, lane widths shall be 3.6 meters and shoulders shall be 2.4 m. If the proposed project

anticipates utilizing non-standard design features a Mandatory Design Exception will be required for Headquarter Approval. If it is anticipated, it is recommended to have the Mandatory Design Exception submitted early because the approval process may be lengthy.

**RESPONSE NO. 3-6**

It is anticipated that the Applicant would apply for a design exception as the proposed street widths would not meet the stated standards. However, the Project's street designs along Lincoln Boulevard are consistent with the existing widths of the corridor.

**COMMENT NO. 3-7**

- If existing on-street parking is to be eliminated, approval from the City will be required.

**RESPONSE NO. 3-7**

No street parking would be eliminated along Lincoln Boulevard as a result of the development of the Revised Mixed Use Project.

**COMMENT NO. 3-8**

**Intersection of Lincoln Boulevard and Maxella Avenue**

- The traffic analysis in the Draft EIR found that the proposed project would significantly impact the intersection of Lincoln Boulevard (SR-1) and Maxella Avenue and, that due to right-of-way restrictions, mitigation measures would not be feasible. We request the lead agency and its traffic engineers consult with this Department to explore other traffic mitigation alternatives for this location.

**RESPONSE NO. 3-8**

As stated in Response to Comment No. 3-2, development of the Revised Mixed Use Project would result in impacts that are less than significant at all 11 analyzed intersections. Thus, no mitigation measures are required.

**COMMENT NO. 3-9**

- We request that left turn movements out of the proposed project location on to Maxella Avenue should be restricted. The driveway should be right turn out only.

**RESPONSE NO. 3-9**

At this point in time, the LADOT has concluded that the requested turn restrictions are not required as there are no physical impacts associated with driveway operations. Furthermore, even if an unanticipated delay were to occur at the stop sign, any queuing that would occur would back up into the project site and not onto the surrounding streets (e.g., Maxella Avenue). However, LADOT reserves the right to impose such restrictions, if appropriate, based on monitoring of actual Project operations.

**COMMENT NO. 3-10**

- Trip Distribution Pattern (Appendix C, Figure 9) assumes no left turns traffic from southbound Lincoln Boulevard (SR-1) to eastbound SR-90. This assumption does not seem realistic. [P]robability would suggest that motorists would prefer to take the shortest route to access SR-90. The assumption that the proposed project traffic would not generate left turn movement from Maxella Ave to Lincoln Boulevard would only be true if the left turn movement out of the proposed project location is restricted.

**RESPONSE NO. 3-10**

It is difficult to turn left onto Maxella Avenue from the Project driveway. In addition, even though the shorter access route to the eastbound SR-90 is via Maxella Avenue and Lincoln Boulevard, drivers would be able to save time and access the Marina Freeway more easily via Maxella Avenue and Glencoe Avenue. As a result, the trip distribution pattern analyzed for the Revised Mixed Use Project reflects the assumption that the majority of these Project trips would turn right onto Maxella and access the eastbound Marina Freeway via Glencoe Avenue.

**COMMENT NO. 3-11**

**Intersection of Lincoln Blvd and SR-90**

- The Draft EIR did not include the SR-90 realignment project that is scheduled to be in construction early 2007. This improvement will significantly impact traffic patterns to both Lincoln Boulevard and SR-90. We request the traffic analysis be revised to include this project when analyzing impacts due to the proposed project.

**RESPONSE NO. 3-11**

If the SR-90 realignment project is indeed implemented, then the intersection operation levels would also improve significantly. The analysis presented in the EIR is, therefore, conservative, and even with the use of conservative assumptions, the analysis concludes that development of the Revised Mixed Use Project would result in impacts that are less than significant at all 11 analyzed intersections.

**COMMENT NO. 3-12**

- We **do not** concur with the trip distribution. The Draft EIR shows that the intersection did not meet the significant impact criteria, an increase in the v/c ratio (0.009). We estimate the criteria for significance would be met without the flawed assumption that project related traffic would generate left turn movements from Maxella Avenue to Lincoln Boulevard. Therefore, again, we request the lead agency consult with this Department to develop possible feasible mitigation measures at this location.

**RESPONSE NO. 3-12**

Please refer to Response to Comment Nos. 3-2 and 3-10.

**LETTER NO. 4**

Southern California Association of Governments  
818 West Seventh Street, 12th Floor  
Los Angeles, CA 90017-3435

**COMMENT NO. 4-1**

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

We have reviewed the Villa Marina Mixed-Use Project, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). The proposed project is not a residential development of more than 500 dwelling units, or a proposed shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space. Therefore, the proposed Project does not warrant comments at this time. It is not necessary to send/provide us a copy of the Final EIR for this Project. However, please provide us with a Notice of Availability for the Final EIR. Please be sure that the Notice includes a complete project description and comment due date. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's **November 1-15, 2004** Intergovernmental Review Clearinghouse Report for public for review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 2361867. Thank you.

**RESPONSE NO. 4-1**

The comment is noted and incorporated into the Final EIR for the review and consideration of the decision makers prior to any approval action on the proposed Project.

**LETTER NO. 5**

Los Angeles County Beaches & Harbors  
13837 Fiji Way  
Marina del Rey, CA 90292

**COMMENT NO. 5-1**

Thank you for sending our Department the Draft Environmental Impact Report for the above-referenced proposed project at the SE corner of Lincoln Blvd. and Maxella Avenue in the City of Los Angeles. The proposed project consists of two components: a 4.04-acre mixed-use development including 310 residential units, 9,000 square feet of retail space and 691 parking spaces; and, two add areas totaling 5.28 acres proposed for rezoning to increase compatibility with the land uses on and around the proposed project.

After careful analysis of this report and consideration of the possible project impacts, the Los Angeles County Department of Beaches & Harbors would like to offer the following comments:

**RESPONSE NO. 5-1**

The description of the proposed Project reflects the Mixed Use Project as analyzed in the Draft EIR. Subsequent to the close of the public comment period the number of residential units was reduced to 244 units, a reduction of approximately 21 percent in the total number of residential units. In addition, there has been a corresponding decrease in on-site parking. The Revised Mixed Use Project provides a total of 594 parking spaces. All of the other elements of the Project as described in the comment remain unchanged. For additional information regarding the Revised Mixed Use Project refer to Section II of this Final EIR.

This comment provides an introduction to the specific comments raised by the Commentor and these comments are addressed below in Response to Comments No. 5-2 through 5-8.

**COMMENT NO. 5-2**

- II. Project Description
- B. Background & Existing Conditions

*Figure 2. Aerial View of Project Site and Surrounding Uses (Page 38)*

Only land uses in the City of Los Angeles are identified. No uses on Admiralty Way and Bali Way are labeled, although structures are clearly visible; please identify land uses.

**RESPONSE NO. 5-2**

Figure 2 on page 38 of the Draft EIR has been revised per the comment. Please refer to Correction and Addition No. III.B.1.

**COMMENT NO. 5-3**

## III. General Description of the Environmental Setting

## B. Identification of Related Projects

## 1. Cumulative Development

*Figure 9: Locations of Related Projects (Page 56) and Table 1: List of Related Projects (Page 57)*

Figure 9 and Table 1 do not adequately show related projects. In the City of Los Angeles, the third residential high-rise tower of the Water Terrace/Regatta complex currently under construction, and within a few blocks of the project, is not indicated on either the table or the map (Marina Pointe Drive).

The table provides a detailed description of Playa Vista development but not of Marina Del Rey development. The '#22' label indicating the location of Marina Del Rey development on the map suggests that all of this development is located 'off the map' in a southeasterly direction. This is incorrect. There are a number of approved and "under construction" projects, which need to be included on this list.

**RESPONSE NO. 5-3**

A field survey of the Water Terrace/Regatta site as well as information from the Water Terrace leasing office indicates that this residential apartment complex has been built and occupied within the last two years. Therefore, at the time the list of the related projects was compiled for the Draft EIR, all of the Water Terrace/Regatta residential high-rise towers were built and occupied. As such, the traffic counts that are incorporated into the Project's traffic analysis include the trips generated by these and all other existing developments. Therefore, the inclusion of the third tower of the Water Terrace/Regatta project as a related project in the Draft EIR was not needed as the trips from this development were already part of existing traffic conditions. Currently, the developer of the Water Terrace/Regatta project is converting one of the three towers from apartment units to condominium units. This conversion is going to result in a reduction in the number of units within this tower. Of importance with regard to this conversion is that the trip generation resulting from the condominium conversion would be less than the trips currently generated by the apartment units. Therefore, the inclusion of the Water Terrace/Regatta project as a related project is not needed as the trips from the original development were part of the Project's traffic baseline (i.e., existing conditions) and the trips

from the current construction effort would be less than the trips that were generated by the original Water Terrace/Regatta development

The Marina del Rey Development included in the Draft EIR Related Projects List and upon which the cumulative analyses are based includes the following land uses: 1,602 hotel rooms, 2,802 residential units, 39,900 square feet of restaurant floor area, 309,700 square feet of retail floor area, 55,870 square feet of office/retail/restaurant floor area, 2 acres of parks, a 645-space parking structure, 235 spaces of public parking, and a 306-space dry boat storage. The land uses are of a sufficient magnitude to address the impacts based on the “approved” and “under construction” projects in Marina del Rey. Based on these land uses, a total of 2,410 A.M. peak-hour trips (785 inbound and 1,625 outbound) and 2,373 P.M. peak-hour trips (1,096 inbound and 1,277 outbound) were incorporated into the Project’s cumulative traffic analysis. The development associated with these trips was also included in the cumulative analyses for all of the other issues analyzed in the Draft EIR.

#### **COMMENT NO. 5-4**

#### IV. Environmental Impact Analysis

##### A. Land Use

##### 2. Environmental Setting

##### a. Existing conditions

##### (3) Regional Context

*Figure 10 Surrounding Land Uses (Page 61)*

Only land uses in the City of Los Angeles are identified. No uses on Admiralty Way and Bali Way are labeled, although structures are clearly visible; please identify land uses.

#### **RESPONSE NO. 5-4**

Figure 10 on page 61 of the Draft EIR has been revised per the comment. Please refer to Correction and Addition No. IV.A.1.

#### **COMMENT NO. 5-5**

#### 4. Cumulative Impacts (Page 80)

According to the text, “the related projects list includes no projects in the immediate vicinity of the proposed project site.” The related projects list is deficient because it does not include the third residential high rise of the Regatta/Water’s Edge complex on Marina Pointe Drive or any of Los Angeles County’s Marina Del Rey projects. There are a number of approved and even “under construction” projects which need to be included on this list.

**RESPONSE NO. 5-5**

The issue raised in this comment is the same as that set forth in Comment No. 5-3. As such, please refer to Response to Comment No. 5-3.

**COMMENT NO. 5-6**

B. Traffic, Circulation and Parking

d. Existing Intersection Level of Service (Page 116)

*Figure 18 Study Intersections Relative to the Project Site (Page 118)*

The intersections at Admiralty/Mindanao, Admiralty/Bali and Admiralty/Fiji were not analyzed although they are within the vicinity of the proposed project. In addition, our Public Works Department has replied separately by letter of November 8, 2004, which further discusses traffic and circulation issues pertaining to this project.

**RESPONSE NO. 5-6**

As the Revised Mixed Use Project is predominantly residential, it is forecasted that only 2 percent of the traffic generated by the Revised Mixed use Project would come from west of Lincoln Boulevard. Therefore, the incremental impact of the Revised Mixed Use Project would not be significant at the Admiralty intersections referenced in the comment.

**COMMENT NO. 5-7**

E. Noise

1. Environmental Setting

b. Existing Local Noise Conditions

1. Noise-Sensitive Receivers (Page 172)

*Figure 21 Noise Sensitive Receptors and Measurement Locations (Page 174)*

The City of Los Angeles' Noise Thresholds Guide states that, "residences, schools, motels and hotels, libraries, religious institutions, nursing homes and parks are generally more sensitive to noise than commercial and industrial uses." There are three such facilities within the general vicinity of the proposed project that are clearly visible in Figure 21, but are not analyzed:

1. Kid's Pointe Day Care, 4311 Lincoln Blvd., City of Los Angeles

2. Los Angeles County Library/Marina Del Rey, 4533 Admiralty Way, Marina Del Rey

---

### 3. UCLA Medical Building, 4564 Admiralty Way, Marina del Rey

#### **RESPONSE NO. 5-7**

Noise impacts were analyzed in Section IV.E of the Draft EIR for various sensitive receiver locations, including the receiver locations that are located closest to the Mixed Use Project Site. With the exception of the Marriot Hotel property (which is part of the Project Site), no significant noise impacts would occur during the short-term construction or long-term operation periods. While other noise-sensitive uses may be visible on Figure 21 on page 174 of the Draft EIR (Noise Sensitive Receptors and Measurement Locations), no noise-sensitive uses are located closer than 400 feet from the Mixed Use Project Site. Of the three (3) additional noise-sensitive uses pointed out by the Commentor, the Kid's Pointe Day Care, which is located immediately adjacent to the Regatta residential development that was identified in the Draft EIR as a noise-sensitive use, is closest to the Mixed Use Project Site at approximately 600 feet. As such, noise during construction at the Kid's Pointe Day Care would be similar to the impacts at the Regatta residential development (i.e., 3.6 dBA [L<sub>eq</sub>] increase in ambient noise level). Thus, noise level increases would not exceed the 5-dBA significance threshold at this location, and as such, impacts would be less than significant. Also similar to the Regatta residential development, noise level increases attributable to the Revised Mixed Use Project at the Kid's Pointe Day Care would be less than significant. At noise-sensitive locations located farther away than the Regatta residential development and Kid's Pointe Day Care (e.g., the Los Angeles County Library and UCLA Medical Building), construction- and operations-period impacts would also be less than significant.

Figure 21 on page 174 of the Draft EIR has been updated to identify the locations of the Kid's Pointe Day Care Los Angeles County Library and UCLA Medical Building. Please refer to Correction and Addition No. IV.E.1.

#### **COMMENT NO. 5-8**

### VI. Growth-Inducing Impacts

#### 2. Creation of Demand Not Satisfied within the project (Page 228)

##### General Comments:

The introduction of 663 new residents, 27 new employees as well as their dependents, family, friends and/or associates will have a direct impact on publicly-serving facilities in the general vicinity of the proposed project. In addition, the potential future redevelopment of the proposed areas may add significantly to these numbers. The City of Los Angeles is expected to provide many of the added public services required for this project. However, because of its location adjacent to Marina Del Rey, Los Angeles County public services may also be impacted. It is

suggested that the impacts to the following services in the vicinity of the proposed project be further studied:

1. Admiralty Park
2. Burton Chace Park
3. Marina (Mother's) Beach
4. Los Angeles County Library/Marina Del Rey
5. South Bay Bicycle Trail
6. Los Angeles County Sheriff's Department patrols within Marina Del Rey.

**RESPONSE NO. 5-8**

The relevant number of new residents refers to the Mixed Use Project as analyzed in the Draft EIR. Subsequent to the close of the public comment period, the number of residential units was reduced to 244 units, which would reduce the number of new residents at the Project Site from 663 to 552, a reduction of approximately 21 percent in the total number of residential units and new residents. The Revised Mixed Use Project, as was the case with the Mixed Use Project analyzed in the Draft EIR, provides a number of on-site amenities that would meet many of the recreational needs of the residents, including, but not limited to, a community meeting room, a swimming pool and/or spa, and an exercise room. The extent to which on-site residents would utilize the referenced facilities and services is anticipated to be extremely limited relative to the current population that uses these facilities.

**LETTER NO. 6**

County of Los Angeles  
Department of Public Works  
900 South Fremont Avenue  
Alhambra, CA 91803-1331

**COMMENT NO. 6-1**

Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the Villa Marina mixed-use project. We have reviewed the DEIR and offer the following comments:

**RESPONSE NO. 6-1**

This comment provides an introduction to the specific comments raised by the Commentor, and these comments are addressed below in Response to Comments No. 6-2 through 6-6.

**COMMENT NO. 6-2**

Solid Waste

Page B-38 of the Initial Study (Appendix A) states that solid waste from the project may be disposed at the Puente Hills Landfill. However, the Puente Hills Landfill does not accept waste originating in the City of Los Angeles. Therefore, the DEIR should be modified to reflect that waste will not be sent to the Puente Hills Landfill and discuss where this waste will be disposed.

**RESPONSE NO. 6-2**

The commenter is correct. The Puente Hill does not accept solid waste from the City of Los Angeles; however, a number of landfills are available that do accept solid waste generated in the City of Los Angeles.

Regarding City-generated solid waste disposal, as of mid-2001, the four landfills that serve the City of Los Angeles (identified above) have a combined remaining capacity of approximately 41.2 million tons. Based on the average disposal rate of 15,100 tons per day at these facilities (as of October 2002), which amounts to approximately 4.7 million tons per year (assuming landfill operations six days per week), the current remaining capacity at these four landfills may be fully consumed by late 2010. This capacity estimate does not include the anticipated landfill expansions that are currently being pursued. As of January 2003, Sunshine Canyon Landfill has received planning approval to operate a new 55-million-ton capacity

expansion within the City of Los Angeles. Although the City has granted planning approval (i.e., use permit from the City Planning Department), a permit to operate the solid waste disposal facility is currently in process with the CIWMB Local Enforcement Agency, with permitting and start of operations in the expansion area anticipated to occur shortly. If this extension is implemented, the City's solid waste disposal capacity (inclusive of all four landfills) would increase by 55 million tons, thereby extending the collective service life of the four facilities to 2022. Based on this information, the EIR's conclusion of a less than significant impact with regard to solid waste disposal facilities is supported.

**COMMENT NO. 6-3**

Transportation/Circulation/Parking

We reviewed the Traffic Impact Study for this project. A copy of our November 8, 2004, letter is enclosed and the comments are still applicable.

**RESPONSE NO. 6-3**

Responses to the comments set forth in the November 8, 2004, letter are addressed below in Response to Comments No. 6-4 through 6-6.

**COMMENT NO. 6-4**

We have reviewed the above-mentioned document for the proposed project located at the southeast corner of Lincoln Boulevard at Maxella Avenue, entirely within the City of Los Angeles.

The project is for the demolition of 30,000 square feet of commercial and retail uses housed in 5 buildings and the construction of a planned, landscaped residential community consisting of 310 condominium units, 9,000 square feet of commercial space, and associated parking and [sic] amenities. The site currently contains a Kinko's, Marie Challender [sic] restaurant, Carl's Jr. fast-food restaurant, Chan Darette Thai Noodle Bar and Grill restaurant, and a unknown commercial development at 13470 Maxella Avenue that appears to be vacant. The planned residential community consists of 60 one-bedroom, 190 two-bedroom, and 60 three-bedroom units. The commercial component would be developed in two separate spaces consisting of 5,000 and 4,000 square feet. The project at its Buildout Year 2008 is estimated to generate a net increase of approximately 1,290 vehicle trips per day, with 124 and 129 vehicle trips during the a.m. and p.m. peak hour, respectively.

**RESPONSE NO. 6-4**

The description of the proposed Project reflects the Project as analyzed in the Draft EIR. Subsequent to the close of the public comment period the number of residential units was

reduced to 244 units, a reduction of approximately 21 percent in the total number of residential units. For additional information regarding the Revised Mixed Use Project refer to Section II of this Final EIR.

**COMMENT NO. 6-5**

We believe a project of this magnitude could potentially impact the roadways and intersections in Marina del Rey which is an unincorporated County area of Los Angeles. The study should be revised to include the project's potential impacts to Marina del Rey, including any necessary mitigation measures to mitigate any identified project impacts.

**RESPONSE NO. 6-5**

The issue raised in this comment is the same as that raised in Comment No. 5-6. As such, refer to Response to Comment No. 5-6.

**COMMENT NO. 6-6**

Additionally, Table 4 on page 19 (Map No. 22) provides for background conditions within the Marina per the Marina del Rey Local Coastal Plan (LCP), but no project specific information is provided. In addition, the referenced LCP footnote (2) is omitted. This information should be included in the study.

**RESPONSE NO. 6-6**

The issue raised in this comment is the same as that raised in Comment No. 5-3. As such, refer to Response to Comment No. 5-3.

**LETTER NO. 7**

Culver City  
Community Development Department  
Planning Division  
9770 Culver Boulevard  
Culver City, CA 90232-0507

**COMMENT NO. 7-1**

The City of Culver City (“The City”) is aware that a Draft Environmental Impact Report (EIR) was released on November 4, 2004, by City of Los Angeles for the proposed Villa Marina Mixed Use Project. The City acknowledges our responsibility and opportunity to comment on the proposed Draft EIR. As you are aware, the project site is adjacent to the boundaries of the City. As such, the proposed Villa Marina Mixed Use Project and the impacts of its operation are of critical interest to the Culver City community.

It is our understanding the Draft EIR has a 45-day review period. We feel this is not sufficient time to review and provide official Culver City comments by our City Council on the Draft EIR.

Based on the magnitude of the proposed project, we are requesting that the City of Los Angeles Planning Department provide a 60-day review period of the Draft EIR.

Additional time is requested in order to distribute copies of the Draft EIR to City Council members and various City Departments for evaluation, prepare a staff report for City Council consideration, agendaize/and notice this item to the community, and finally transmit Culver City’s formal comments to the City of Los Angeles.

We appreciate your prompt attention to this matter and look forward to notice of an extension to the review period from your agency. Should you have questions or comments, please contact me at (310) 253-5755.

**RESPONSE NO. 7-1**

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision-makers prior to any approval action on the Project. The Project’s Draft EIR was circulated for a 45-day public review period in accordance with all CEQA requirements.

The basis for the request for an extended public review period, as stated in the comment, was for the City of Culver City to comment on the Draft EIR through a formal process involving their City Council. This request was granted and the public review period was extended to January 6, 2005, for the City of Culver City. Letter No. 7 is the end product of the process the Commentor was seeking to accomplish via the extended public review period. Please refer to Response to Comment Nos. 8-1 through 8-22 relative to issues raised by the City of Culver City in its subsequent letter.

**LETTER NO. 8**

City of Culver City  
9770 Culver Boulevard  
Culver City, CA 90232-0507  
www.culvercity.org

**COMMENT NO. 8-1**

Thank you for the opportunity to review and comment on the November 2004 Draft Environmental Impact Report (Draft EIR) for the Villa Marina Mixed-Use Project.

This letter transmits the City of Culver City's (the "City") comments on the Draft EIR which are provided in Resolution No. 2004-R095, including Exhibit A, which the Culver City City Council approved on Monday, December 13, 2004.

The City appreciates the time and effort that went into the preparation of the 2004 Draft EIR. However, there are several issues, which are of concern to Culver City regarding the 2004 Draft EIR.

We look forward to receiving the response to comments to the Draft EIR. Should you have any questions, I can be reached at (310) 2535755

**RESPONSE NO. 8-1**

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the Project. Responses to the balance of the comments presented in this letter are presented below.

**COMMENT NO. 8-2**

WHEREAS, the City of Los Angeles is proposing to adopt the Villa Marina Mixed Use Project located at 13480 and 13490 Maxella Ave. and 4350, 4356 and 4358 Lincoln Blvd., which is located approximately ½ mile south of the western boundary of the City of Culver City; and

WHEREAS, the proposed project consists of two components; the development of a mixed use project consisting of residential and retail uses (the "Mixed Use Project") and two parcels for which the City of Los Angeles is initiating a Community Plan Amendment and Zone Change in order to create land use designations that are consistent with existing uses on and around the subject parcels (the "Add Areas"); and,

WHEREAS, the project site consists of a total of 9.32 acres. Of this total, the Mixed Use Project would occupy 4.04 acres, while the Add Areas would comprise the remaining 5.28 acres; and,

WHEREAS, the Mixed Use Project consists of 310 residential condominium units, and 9,000 square feet of retail uses. Parking accommodations include a one-level subterranean, second-level podium, surface level parking totaling 691 spaces; and,

WHEREAS, the City of Los Angeles has prepared a Draft EIR dated November 2004 to analyze potential environmental impacts caused by the proposed Mixed Use Project, which was released for public review and comment on November 4th, 2004; and,

WHEREAS, a City staff team, consisting of various City Departments and consultants was established to evaluate and comment on the adequacy of the Draft EIR in addressing potential impacts to Culver City; and,

WHEREAS, the City Council of the City of Culver City, accepted public comments and considered the Draft EIR at public meetings on November 22, 2004 and December 13, 2004.

NOW, THEREFORE, the City Council of the City of Culver City, California, DOES HEREBY RESOLVE as follows:

1. Establishes that this Resolution, including attached Exhibit A, constitutes the City of Culver City's official comments on the November 2004 Draft EIR that was prepared for the proposed Villa Marina Mixed Use Project.
2. Directs and authorizes staff to transmit comments of the City of Culver City on the Draft EIR to the City of Los Angeles.

APPROVED and ADOPTED this 13th day of December 2004.

**RESPONSE NO. 8-2**

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision-makers prior to any approval action on the Project. The description of the proposed project reflects the Mixed Use Project as analyzed in the Draft EIR. Subsequent to the close of the public comment period the number of residential units was reduced to 244 residential units, a reduction of approximately 21 percent in the total number of residential units. In addition, there has been a corresponding decrease in on-site parking. The Revised Mixed Use Project provides a total of 594 parking spaces. All of the other elements of

the Project, as described in the comment, remain unchanged. For additional information regarding the Revised Mixed Use Project refer to Section II of this Final EIR.

This comment provides an introduction to the more specific comments which are addressed below in Response to Comment Nos. 8-3 through 8-22.

**COMMENT NO. 8-3**

**General Comments**

1. The City of Culver City was not notified and did not receive the Notice of Preparation (NOP) of a Draft EIR for the Villa Marina Mixed-Use project during the 30-day public review period (September 2–October 1, 2004). The City of Culver City’s border is within close proximity (½ mile of the project site) and would be reasonably impacted by the implementation of this proposed project. Please add us to your notification list and inform of us any future public meetings or hearings on this project. Because we were not notified during the NOP stage, we were unable to provide the Lead Agency with early comments on the scope and content of the Draft EIR and associated technical studies.

**RESPONSE NO. 8-3**

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the Project. The City of Culver City has been added to the City of Los Angeles’ mailing list for all future notifications involving public meetings or hearings for the proposed Project.

**COMMENT NO. 8-4**

**Traffic**

2. Glencoe/Washington Mitigation Measure Infeasibility. The DEIR identifies, as a traffic mitigation measure for the intersection of Glencoe Avenue and Washington Boulevard, the installation of an additional left turn lane for Washington Boulevard into Glencoe Avenue. Implementation of this mitigation measure would result in prohibiting parking along the south side of Washington Boulevard, eliminating 6 parking spaces. However, the number of parking spaces lost would exceed 6. Additional curbside parking spaces would be lost on the west side of Glencoe Avenue south of the intersection, and along the south side of Washington Boulevard to the west of the intersection. There is no discussion of the parking impacts created by the loss of these on-street spaces and how they will be replaced. The impact of this loss of parking spaces on Washington Boulevard to the adjoining businesses should be evaluated. Additionally, the loss of these metered parking spaces will have a financial impact to Culver City in terms of

lost parking meter revenue. This impact was not addressed and no mitigation measures were provided.

#### **RESPONSE NO. 8-4**

Subsequent to the close of the public comment period, the number of residential units proposed for development was reduced from 310 to 244 units. The updated traffic analysis concludes that the development of the Revised Mixed Use Project would result in impacts that are less than significant at all of the 11 analyzed intersections, including the Washington Boulevard/Glencoe Avenue intersection. With the elimination of the significant impact identified in the Draft EIR, the mitigation measure identified in the Draft EIR for this intersection is no longer required. As such, the loss of on-street parking that is addressed in this comment would not occur. Thus, the Revised Mixed Use Project would have no on-street parking impacts since there would be no loss of metered parking spaces on Washington Boulevard. Please refer to Section II and Appendix A of this Final EIR for a discussion of the traffic impacts of the Revised Project.

#### **COMMENT NO. 8-5**

3. A more significant problem with the proposed mitigation measure is that Glencoe Avenue is too narrow a street to accept traffic fed by two left turn lanes. Currently, Glencoe Avenue is striped to allow for a single lane in the southbound direction with a width of 21 feet. Ideally, the receiving end of dual left turn lanes should be 30 feet, or an average of 15 feet per lane. This width could be lessened, depending on whether the turn radii of the expected traffic mix could be handled by the receiving lanes. In any case, the 21-foot width is certainly too tight to accommodate dual left turn lanes. Glencoe Avenue would have to be widened by at least 5 feet. Because the right-of-way between the property line and curb line appears to be about 8 feet, this would require the acquisition of right-of-way from the adjacent property to provide a minimal 6-foot wide sidewalk. The City of Culver City has expended significant efforts to improve the aesthetics of the public right-of-way to improve the quality of life and enhance the economic development of businesses and the Community. The resulting impacts of creating a barren utilitarian streetscape in this area as well as the required right-of-way acquisition should be identified in the DEIR.

#### **RESPONSE NO. 8-5**

The updated traffic analysis that was prepared to reflect the reduction in the number of residential units from 310 to 244 concludes that the Revised Mixed Use Project would result in less than significant impact at the Washington Boulevard/Glencoe Avenue intersection. Therefore, as the improvement under discussion in this comment is no longer needed as a mitigation measure to address a significant impact of the Project, no further response to this comment is required. Refer to Response to Comment No. 8-4 for additional information regarding this issue.

**COMMENT NO. 8-6**

4. Even if Glencoe Avenue were widened immediately south of Washington Boulevard, a further problem would occur farther to the south, at the intersection of Beach Avenue. The two southbound lanes of Glencoe Avenue would have to merge into a single lane south of Beach Avenue, but the alignment of Glencoe Avenue is too severely offset to provide an acceptable lane transition. The traffic problems resulting from the increased traffic on Glencoe in conjunction with this difficult lane transition is not addressed in the DEIR. The project will need to identify another mitigation measure for this intersection. Otherwise the intersection will have an unmitigated significant impact.

**RESPONSE NO. 8-6**

The updated traffic analysis prepared for the Revised Mixed Use Project to reflect the reduction in the number of residential units from 310 to 244 concludes that the Revised Mixed Use Project would result in less than significant impact at the Washington Boulevard/Glencoe Avenue intersection. Therefore, as the improvement under discussion in this comment is no longer needed as a mitigation measure to address a significant impact of the Project, no further response to this comment is required. Refer to Response to Comment No. 8-4 for additional information regarding this issue.

**COMMENT NO. 8-7**

5. In appendix C, Traffic Study, page 14, table 3 shows that the current (2004) LOS is B for the intersection of Lincoln Boulevard and Washington Boulevard in the AM peak hour. In the Playa Vista Draft Environmental Impact Report, it shows the same intersection is operating at LOS D for 2003 in the AM peak hour. The Cumulative Base V/C ratio should be re-evaluated and compared to the Cumulative Plus Project V/C ratio for this intersection.

**RESPONSE NO. 8-7**

The intersection capacity analysis performed for the intersection of Lincoln Boulevard and Washington Boulevard was calculated based on new traffic volume counts conducted in June 2004, which resulted in an LOS B for this intersection during A.M peak hour. The difference noted in the comment results from traffic count data collected at different time frames. The traffic count data used in this EIR is more current and therefore a more applicable based upon which to analyze the Project's potential traffic impacts. As such, the analyses presented in the Draft and Final EIR are technically valid.

**COMMENT NO. 8-8****Related and Cumulative Impacts**

6. The Related Projects section is inadequate and several projects within the site's vicinity have been omitted. The EIR indicates there are 24 cumulative projects within the study area. The latest cumulative project list for Culver City contains 27 projects of which only two are included in the cumulative project list in the traffic section of the EIR. The traffic study for the EIR does not include Phase 2 of the Playa Vista Project which will generate a significant amount of traffic in the project study area. Project 22 (Table 6) in the cumulative project list of the traffic study indicates "Marina Del Rey Development" but does not identify the characteristics of these projects. As such, it is unclear that the amount of traffic generated by these projects is being accounted for correctly and adequately addressed in the EIR. Given the number of major projects omitted from the cumulative project list, this means the future without project and future with project traffic conditions and associated impacts may be understated and inadequately addressed. Thus the future no project and with project scenarios 'should be reanalyzed to ensure the intersection levels of service are correctly reported and additional mitigation measures, if any, identified.

**RESPONSE NO. 8-8**

Playa Vista Phase 2 would not be open and operating within the timeframe for the Revised Mixed Use Project and, as such, is appropriately excluded from the traffic analysis for the Revised Mixed Use Project. Trip-making associated with cumulative development within Marina del Rey is described in Response to Comment No. 5-3. The City of Culver City related projects list was reviewed, and, based on this review, it is concluded that there is only one project within the vicinity of the proposed Project that was not included in the Project's list of related projects. This project consists of a commercial and retail development with 4,527 square feet of commercial space at Washington Boulevard near the vicinity of the Project Site and would generate 24 A.M. peak-hour trips and 79 P.M. peak-hour trips. The traffic analysis for the Revised Mixed Use Project includes an ambient growth factor to account for a number of future changes in the traffic environment, including, but not limited to, the future development of small related projects such as the one currently under discussion. As such, the traffic that this project would generate is accounted for in the ambient growth factor incorporated into the traffic analysis for the Revised Mixed Use Project, as well as the traffic analysis presented in the Draft EIR (i.e., 1 percent per year). As the traffic volumes from this project are already reflected in the Project's traffic analysis, no additional analysis of this particular related project is required.

**COMMENT NO. 8-9**

7. The List of Related Projects on page 57 includes projects that will provide over 5,000 new housing units in the immediate Villa Marina project area. While the number of vehicle trips and person trips on transit generated by the proposed project may be below impact criteria at most of the study intersections, the cumulative impacts of this new housing supply has the potential to

significantly impact quality of life for neighboring Culver City residents and decrease the supply of seating for transit passengers, among other concerns. Villa Marina, in conjunction with other local projects, may have to look beyond typical mitigation measures if it hopes to be a good neighbor.

**RESPONSE NO. 8-9**

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision-makers prior to any approval action on the Project. The cumulative impacts of this housing growth, as well as all other related project's has been analyzed for each of the environmental issues included in the EIR. As such, no further analysis is required. Furthermore, the Draft and Final EIR fully analyze all of the Project's potential transportation impacts, including, but not limited to, potential transit impacts. As the Revised Mixed Use Project would not result in any significant transportation impacts, no mitigation measures are required.

**COMMENT NO. 8-10**

Transportation

8. The existing transit service analysis does not include Culver CityBus line 2. Line 2 runs hourly on weekdays from the Fox Hills Mall Transit Center north on Inglewood to westbound Washington, making a loop on Lincoln to Venice to Beethoven and back to the Mall. Reference to "seven" existing transit lines should be changed to "eight" on pages 21, 115, 116, 129 and pages 13 and 15 of the Traffic Study.

**RESPONSE NO. 8-10**

The comment is noted and will be incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the Project.

Please refer to Corrections and Additions No. IV.C.(1).a as presented in Section IV of this Final EIR. A correction has been made to page 129 of the Draft EIR to indicate that there are "eight" public transit lines.

**COMMENT NO. 8-11**

9. Executive Summary, page 21. In the first sentence of the second paragraph, it states that the project would only increase public transit ridership by six trips. Please specify whether these are six person trips or bus trips.

**RESPONSE NO. 8-11**

The proposed Project would increase public ridership by six person trips.

**COMMENT NO. 8-12**

10. The DEIR estimates that the mixed use project would increase public transit ridership by 6 trips in the p.m. peak hour. However, there is no explanation of the methodology behind this calculation, nor is there any estimate of transit impacts during the a.m. peak hour. The site's proximity to a designated Congestion Management Program transit corridor, multi-modal transportation center, or transit center is not clear; this proximity is usually the basis for the transit impact calculation. Both Lincoln and Washington Boulevards meet the criteria for designated CMP transit corridors. The percentage of new trips that are expected to be made by transit should be defined (and in the case of the a.m. peak period, provided). Culver City cannot evaluate impacts without knowing what they may be or how they were calculated.

**RESPONSE NO. 8-12**

The transit ridership increase of six person trips applies to both the A.M. and P.M. peak hours. This was estimated based on the conservative assumption of a 5 percent transit mode split for the traffic generated by the Mixed Use Project.

**COMMENT NO. 8-13**

11. Culver CityBus lines 1 and 2 are dramatically impacted by traffic in the Washington/Glencoe/Lincoln area. Not only is congestion severe, but bus operators also confirm that traffic signals are not well synchronized in this stretch. On a regular basis buses fall behind by five or more minutes when traveling in the Lincoln to Redwood segment of Washington Boulevard. Running behind schedule can have a significant and negative impact on all bus passengers, not only those on or waiting for the bus, but those who may be turned off from transit when its reliability is reduced. The DEIR does not analyze any potential impacts to transit bus running times in general, and there is no analysis whatsoever on the impact to transit service at Washington/Glencoe. Furthermore, although there is mitigation provided for westbound Washington Blvd. at Glencoe, there is nothing proposed to mitigate eastbound traffic at this intersection. The eastbound approach is where Culver City buses fall farthest behind schedule.

**RESPONSE NO. 8-13**

As noted in comment, this is an existing problem. The Revised Mixed Use Project adds less than 1 percent of traffic to the overall traffic at this intersection and would not create any significant impacts attributable to the Revised Mixed Use Project. The mitigation measure identified in the Draft EIR for the Washington Boulevard/Glencoe Avenue intersection is no longer required, due to the reduction in development under the Revised Mixed Use Project. Refer to Response to Comment No. 8-4.

**COMMENT NO. 8-14**

**Construction Impacts**

12. There is minimal discussion in the Draft EIR of traffic and parking impacts in Culver City during construction. Major construction projects involve a substantial amount of traffic from construction workers and suppliers, much of which involves trucks and heavy equipment. Street closures are common, and parking areas are often used for staging areas. The document should analyze traffic impacts from construction vehicles, workers, temporary road closures, parking needs of construction employees, and the loss of available parking due to use of parking areas for construction staging and equipment storage. The DEIR should include a mitigation measure calling for the preparation of a construction traffic control plan, with the provision that the Culver City Traffic Engineer will be consulted during the preparation of the plan. The traffic control plan should include a requirement that construction staging occur in locations that minimize impacts on adjacent residential neighborhoods and Culver City streets.

**RESPONSE NO. 8-14**

The number of on-road trips generated during construction of the Revised Mixed Use Project would be less than those generated during operations. The preparation of a construction traffic management plan is concluded to be a feasible mitigation measure and has been added as a mitigation measure. Please refer to Correction and Addition No. IV.C.2.

**COMMENT NO. 8-15**

13. There is no explanation or map of potential haul routes for construction vehicles and/or analysis of possible impacts on Culver City. The use of approved Culver City haul routes and schedules should be included as a mitigation measure if routes pass through Culver City.

**RESPONSE NO. 8-15**

The use of approved Culver City haul routes and operating hours has been added as a mitigation measure. Please refer to Correction and Addition No. IV.C.3.

**COMMENT NO. 8-16**

14. The DEIR provides no information on parking for construction personnel and potential overflow parking into local neighborhoods. Circling for on-street spaces by local residents and/or construction personnel can decrease local air quality.

**RESPONSE NO. 8-16**

Parking would be accommodated on site or arrangements would be made to provide parking on the upper levels of the parking structure across the street from the Revised Mixed Use Project. Thus, impacts associated with construction parking would be less than significant.

**COMMENT NO. 8-17**

Air Quality/Circulation

15. The DEIR includes no analysis of the number of truck trips that are estimated to remove the 100,000 cubic yards of earth and potential impacts on air quality, on local streets, and on the performance of transit service.

**RESPONSE NO. 8-17**

The analysis of the air quality impacts is presented in Section I.V.D.3(1) Construction-Period Impacts on pages 150 to 152 of the Draft EIR. The construction trip assumptions incorporated into the air quality analysis for haul trucking are as follows: Demolition Phase—21 daily trips, 627 daily vehicle miles traveled (VMT); and Site Excavation—57 daily trips, 1,136 daily VMT.

Even if the maximum of 57 daily trips (137 passenger car equivalent daily trips) were to occur during the site excavation phase, there would still be fewer trips than the number being generated by the existing uses at the site. Thus, construction traffic impact on the transit or roadway system would be less than significant. As peak construction levels would be the same for the Revised Mixed Use Project as those analyzed in the Draft EIR, this analysis also applies to the Revised Mixed Use Project.

**COMMENT NO. 8-18**

16. Because construction of the mixed use development will still result in regional NOx emissions that exceed the SCAQMD regional daily significance threshold even after mitigation, Culver City would encourage the imposition of additional mitigation measures to reduce vehicle trips (and therefore NOx emissions). Rideshare and transit incentives to construction personnel should be provided. Culver CityBus would look forward to working with the project developers to institute a bus pass program.

**RESPONSE NO. 8-18**

There would be relatively few construction workers on site at any one time due to the relatively small size of the Revised Mixed Use Project. The nature of construction is such that construction workers live all over the area and transit incentives such as those suggested in the comment are generally only effective when the trip origin occurs in relative proximity to the

destination. Moreover, construction workers often bring equipment with them that would preclude transit ridership. Therefore, it is anticipated that only a small percentage of construction workers would utilize transit incentives, and, as such, the effectiveness of the suggested mitigation measure is sufficiently limited so as to preclude its feasibility. However, there is a much greater chance for ridesharing because it is not unusual for construction workers to carpool. As a result a mitigation measure promoting ridesharing among construction workers has been added. Please refer to Corrections and Additions No. IV.D.1 as presented in Section III of this Final EIR.

**COMMENT NO. 8-19**

17. Culver City recommends the following additional air quality mitigation measures be included to reduce air quality impacts:

- Low sulfur fuel shall be used for construction equipment.
- The project sponsor should ensure efficient parking management as to reduce impacts on local neighborhoods and avoid construction personnel parking in lots for neighboring businesses.

**RESPONSE NO. 8-19**

Construction-related related daily (short-term) emissions would not exceed SCAQMD significance thresholds for SO<sub>x</sub>; therefore, there is no obligation under CEQA to impose the mitigation measure suggested in the comment. Refer to Response to Comment No 8-18 with regard to construction worker parking.

**COMMENT NO. 8-20**

Land Use

18. The project proposes a Community Plan Amendment and Zone Change from Industrial to Commercial for the “Add Areas” of the project (i.e., areas where no new development is proposed). The EIR does not analyze the potential conversion from industrial to commercial use (the existing land use is commercial, a hotel and gasoline filling station). Even though there is no conversion of industrial uses that would be facilitated by the proposed project, the EIR should provide an analysis of any potential impact of this proposed zoning conversion.

**RESPONSE NO. 8-20**

No physical changes are proposed for the Add Areas as part of the proposed Project. The analysis requested in the comment is provided in Section VI.2 of the Draft EIR. For the reasons stated therein, an analysis of any changes to existing development within the Add Areas as a

result of the proposed Community Plan amendments and zone changes is deemed to be speculative per CEQA Guidelines Section 15145.

**COMMENT NO. 8-21**

19. The Draft EIR identifies 40 parking spaces allocated for the proposed 9,000 square foot area designated for retail uses. However, should a restaurant use occupy a portion this space, the 40 parking spaces proposed might not be enough as the parking demand for a restaurant use is more intensive than a typical retail use. This may lead to surrounding traffic congestion and overflow parking impacts.

**RESPONSE NO. 8-21**

The Revised Mixed Use Project does not include a restaurant. The 40 parking spaces assigned to the retail uses exceed the parking requirements for this component of the Revised Mixed Use Project as established by the Los Angeles Municipal Code.

The reduced Mixed Use Project would continue to provide 691 parking spaces, exceeding the LAMC Parking requirements and the Mixed Use Project's forecasted parking demand.

**COMMENT NO. 8-22**

20. The analysis of potential project impacts on surrounding land uses does not consider Culver City. The Community Plan Land Use Designations map shown in Figure 11 on page 68 is split in half by the City of Culver City; however it is as if the Palms–Mar Vista–Del Rey Community Plan exists in a vacuum. Likewise, the list of related projects does not include any new developments in Culver City.

**RESPONSE NO. 8-22**

Related projects that are located within Culver City are located sufficiently distant from the Project site such that they would not result in a cumulative impact with regard to issues of a localized nature, such as land use compatibility, visual resources, and construction-related impacts. With regard to impacts related to traffic, any related projects in Culver City are located sufficiently distant from the Project site such that the traffic generated by these projects would be accounted for in the ambient growth factor used in the Project's traffic analysis. As this analysis also serves as the basis for the analysis of the Project's potential roadway air quality and noise impacts, the cumulative analyses for the issues of traffic, air quality and noise already take into account related projects in Culver City. As such, the analyses presented in this EIR are adequate under CEQA and no further analysis is required. Also refer to Response to Comment No. 8-8 regarding the inclusion of related projects located within the City of Culver City.

**LETTER NO. 9**

Ross Latimer  
[no address]

**COMMENT NO. 9-1**

As a property owner in the area, I am deeply concerned about the impact that the proposed development at Maxella Avenue and Lincoln Blvd. in Marina del Rey will have on the area. I understand the desirability of increased revenues to the city by such development, but recent expansion in the area is making traffic unbearable. The congestion will increase significantly as the Playa Vista project is completed. Even though people are expected to use the freeway to get North or South, the 405 freeway is becoming so congested that many are now using the surface streets as an alternative route, adding to the congestion. The proposed development referenced above will only add to the already significant congestion. I hope you will reconsider your support for this project.

**RESPONSE NO. 9-1**

The comment is noted and incorporated into the Final EIR to be provided for the review and consideration of the decision makers prior to any approval action on the proposed Project. Development of the Revised Mixed Use Project would result in impacts that are less than significant at all 11 analyzed intersections (refer to Section II of this Final EIR).

**LETTER NO. 10**

Ellen S. Randall  
for  
Mr. and Mrs. Wm. A. Randall  
4330 Glencoe Avenue, #2  
Marina del Rey, CA 90292

**COMMENT NO. 10-1**

Dear Sir:

This note is re: “Project considered on Maxella & Lincoln Blvd.”

We are a 31 year resident[s] in Villaveltri, (sorry) a condo project, across from your proposed project. We are a 232 unit group. You are proposing 310 residential units, and 691 parking spaces. This is absurd—691 for your whole project? We have 2 spots for each condo, which is realistic.

**RESPONSE NO. 10-1**

The description of the proposed project reflects the Mixed Use Project as analyzed in the Draft EIR. Subsequent to the close of the public comment period, the number of residential units was reduced to 244 units, a reduction of approximately 21 percent in the total number of residential units. In addition, there has been a corresponding decrease in on-site parking. The Revised Mixed Use Project provides a total of 594 parking spaces. All of the other elements of the Project, as described in the comment, remain unchanged. For additional information regarding the Revised Mixed Use Project refer to Section II of this Final EIR.

Refer to Section VI.C.3c.(9), Parking Impact, on page 130 of the Draft EIR. The Parking Impact analysis is based on shared parking and other parking studies in the Marina Del Rey area and indicates that the proposed parking supply would be adequate to meet the project parking demand generated by the Mixed Use Project analyzed in the Draft EIR. Based on the analysis presented in Section II of this Final EIR, this same conclusion applies to the Revised Mixed Use Project.

**COMMENT NO. 10-2**

Also, we are surrounded by condos and apartments and Playa Vista. Judging from signs, the occupancy rate is low. Why do we need more? Traffic is horrendous now—I can scarcely get out of my driveway.

So—we totally oppose the magnitude of this project.

**RESPONSE NO. 10-2**

The comment is noted and incorporated into the Final EIR to be provided for the review and consideration of the decision makers prior to any approval action on the proposed Project. The Applicant, following the close of the Draft EIR public review, voluntarily reduced the amount of proposed residential development from 310 units to 244 units, a reduction of approximately 21 percent in the total number of residential units.

## MEMORANDUM

TO: Esther Tam  
Los Angeles Department of Transportation

FROM: Pat Gibson  
Yu-Ying Chu

SUBJECT: Villa Marina Residential Project Alternative Traffic Evaluation

DATE: February 23, 2005 REF: 1632.01

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Subsequent to the preparation of the traffic report for the Villa Marina project, the project was reduced even further than the Reduced Project Alternative summarized in that analysis. Your office reviewed and signed off on the report, but we wanted to supply you with this new analysis for your review and for your files.

This memorandum summarizes the analyses performed for the Revised Project alternative and serves as an addendum to the *Traffic Study for the Villa Marina Residential Project* (Kaku Associates, Inc., February 2005).

### PROJECT ALTERNATIVE DESCRIPTION

The original project description included 310 condominiums and 9,000 sf of retail. That project resulted in significant impacts at two intersections.

The traffic report also analyzed a Reduced Alternative that contained 275 condominiums and 5,500 sf of retail. This Reduced Alternative did not cause a significant impact at any of the study intersections.

The Revised Project alternative would develop 244-dwelling units of condominiums in combination with 9,000 square feet of retail uses.

### TRAFFIC ANALYSIS

Traffic analysis was conducted for Revised Project alternative. As indicated in the *Traffic Study for the Villa Marina Residential Project*, only two of the 11 intersections selected for analysis are expected to experience significant impact by the project at 2007 conditions.

As described above, the Revised Project alternative is a downsized variation of the proposed project; therefore, any potential for impacts would only occur at the intersections previously identified as significantly impacted. As such, the same two intersections were analyzed in this additional study:

1. Glencoe Avenue and Washington Boulevard
2. Lincoln Boulevard and Maxella Avenue

The analysis performed for the Revised Project alternative is consistent with the methodologies described in the *Traffic Study for the Villa Marina Residential Project*. The existing (2004) and cumulative base (2008) conditions from the report were used in this analysis. Table 1 summarizes the Revised Project alternative trip generation.

As summarized in Table 1, the Revised Project alternative is a reduction of the proposed project and would generate approximately 95 a.m. and 83 p.m. peak hour trips. Compared to the proposed project, this represents a reduction of 29 a.m. and 46 p.m. peak hour trips. Compared to the Reduced Alternative in the traffic report, this Revised Project Alternative would generate nine fewer morning peak hour trips and three more afternoon peak hour trips.

Adding the Revised Project Alternative project volumes to the cumulative base volumes, the level of service (LOS) analysis indicated that the intersections of Glencoe Avenue and Washington Boulevard and Lincoln Boulevard and Maxella Avenue would operate at LOS E during the p.m. peak hour, and the incremental increase in the volume to capacity (V/C) ratio would not result in a significant impact with the project reduction. These results are summarized in Table 2.

## **SUMMARY OF FINDINGS**

- The full traffic report for the Villa Marina Residential Project can be found in the *Traffic Study for the Villa Marina Residential Project*.
- The Revised Project Alternative of 244 dwelling units of condominiums and 9,000 square feet of retail uses is now being considered for the Villa Marina Residential Project:
- Two intersections, found to result in significant impact with the proposed project, were also analyzed for the Revised Project:
  1. Glencoe Avenue and Washington Boulevard
  2. Lincoln Boulevard and Maxella Avenue
- Analysis of the Revised Project alternative indicated that the two intersections would not be significantly impacted at project buildout. Therefore, no mitigation would be required.

**TABLE 1  
ESTIMATED PROJECT TRIP GENERATION**

	Size	ITE Code	Daily	AM Peak Hour			PM Peak Hour		
				IN	OUT	TOTAL	IN	OUT	TOTAL
<b>Proposed Project</b>									
Condominium	244 DU	230	1,430	18	89	107	115	56	171
Shopping Center	9,000 sq.ft	820	1,449	23	15	38	63	68	131
Pass-by Trips	50%		(725)	(11)	(8)	(19)	(32)	(34)	(66)
<b>Subtotal</b>			<b>2,154</b>	<b>30</b>	<b>96</b>	<b>126</b>	<b>146</b>	<b>90</b>	<b>236</b>
<b>Existing to be Removed</b>									
Shopping Center	21,038 sq.ft	820	2,502	38	25	63	147	160	307
Pass-by Trips	50%		(1,251)	(19)	(13)	(32)	(74)	(80)	(154)
<b>Subtotal</b>			<b>1,251</b>	<b>19</b>	<b>12</b>	<b>31</b>	<b>73</b>	<b>80</b>	<b>153</b>
<b>Total Net Trips</b>			<b>903</b>	<b>11</b>	<b>84</b>	<b>95</b>	<b>73</b>	<b>10</b>	<b>83</b>

Condominium Rate: Daily = 5.86  
trips/dwelling unit AM = 0.44 In: 17% Out: 83%  
PM = 0.70 [a] In: 67% Out: 33%

Shopping Center Rates: Daily =  $\exp(0.643 \cdot \ln(Z1) + 5.866)$   
trips/1000 sf AM =  $\exp(0.596 \cdot \ln(Z1) + 2.329)$  In: 61% Out: 39%  
PM = 14.6 [a] In: 48% Out: 52%

Source: Rates from ITE, *Trip Generation Manual*, 6th Edition, unless otherwise noted.  
[a] Rates from Coastal Corridor Specific Plan Ordinance

**TABLE 2  
YEAR 2008 FUTURE CONDITIONS  
INTERSECTION LEVELS OF SERVICE**

Intersection	Peak Hour	Cumulative Base [a]		ITE Trip Gen			
		V/C	LOS	Cumulative Plus Revised Project Alternative		Project Increase in V/C	Significant Project Impact
				V/C	LOS		
1 Glencoe Ave & Washington Blvd	AM	0.590	A	0.604	B	0.014	NO
	PM	0.953	E	0.962	E	0.009	NO
2 Lincoln Blvd & Maxella Ave	AM	0.857	D	0.866	D	0.009	NO
	PM	0.932	E	0.941	E	0.009	NO

Notes:

- All study Intersection are currently operating under ATSAC system.

## INTERSECTION DATA SUMMARY SHEET

N/S:  W/E:  I/S No:

AM/PM:  Comments:

COUNT DATE:  STUDY DATE:  GROWTH FACTOR:

Volume/Lane/Signal Configurations												
	NORTHBOUND			SOUTHBOUND			WESTBOUND			EASTBOUND		
	LT	TH	RT	LT	TH	RT	LT	TH	RT	LT	TH	RT
EXISTING	184	62	306	70	36	26	269	676	134	21	950	160
AMBIENT												
RELATED												
PROJECT												
TOTAL	184	62	306	70	36	26	269	676	134	21	950	160
LANE	 1 1 0 0 0 1 0	 1 1 0 0 0 1 0	 1 0 2 0 0 1 0	 1 0 2 0 0 1 0								
SIGNAL	Phasing: <input type="text" value="Split"/> RTOR: <input type="text" value="Auto"/>	Phasing: <input type="text" value="Split"/> RTOR: <input type="text" value="Auto"/>	Phasing: <input type="text" value="Prot-Var"/> RTOR: <input type="text" value="Auto"/>	Phasing: <input type="text" value="Prot-Var"/> RTOR: <input type="text" value="Auto"/>								

### Critical Movements Diagram

	<b>SouthBound</b> A: <input type="text" value="53"/> B: <input type="text" value="53"/>			
<b>EastBound</b> A: <input type="text" value="475"/> B: <input type="text" value="21"/>		<b>WestBound</b> A: <input type="text" value="338"/> B: <input type="text" value="269"/>	<u>V/C RATIO</u>	<u>LOS</u>
			0.00 - 0.60	A
			0.61 - 0.70	B
			0.71 - 0.80	C
			0.81 - 0.90	D
			0.91 - 1.00	E

A = Adjusted Through/Right Volume  
 B = Adjusted Left Volume  
 \* = ATSAC Benefit

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### Results

North/South Critical Movements = A(N/B) + A(S/B)  
 West/East Critical Movements = B(W/B) + A(E/B)

$V/C = \frac{171 + 53 + 269 + 475}{*1375} = 0.634$

LOS = B

## INTERSECTION DATA SUMMARY SHEET

N/S:  W/E:  I/S No:

AM/PM:  Comments:

COUNT DATE:  STUDY DATE:  GROWTH FACTOR:

Volume/Lane/Signal Configurations																							
	NORTHBOUND			SOUTHBOUND			WESTBOUND			EASTBOUND													
	LT	TH	RT	LT	TH	RT	LT	TH	RT	LT	TH	RT											
EXISTING	77	2964	247	146	2318	65	241	24	162	91	84	148											
AMBIENT																							
RELATED																							
PROJECT																							
TOTAL	77	2964	247	146	2318	65	241	24	162	91	84	148											
LANE																							
	2	0	3	0	0	1	0	2	0	3	0	1	0	0	1	1	0	0	0	1	0	1	0
SIGNAL	Phasing		RTOR		Phasing		RTOR		Phasing		RTOR		Phasing		RTOR								
	Prot-Fix		Auto		Prot-Fix		Auto		Split		Auto		Split		Auto								

### Critical Movements Diagram

	<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> <b>SouthBound</b>                  A: <input type="text" value="596"/>                  B: <input type="text" value="80"/> </div> <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; padding: 5px; text-align: center;"> <b>EastBound</b>                      A: <input type="text" value="127"/>                      B: <input type="text" value="91"/> </div> <div style="text-align: center;"> </div> <div style="border: 1px solid black; padding: 5px; text-align: center;"> <b>WestBound</b>                      A: <input type="text" value="133"/>                      B: <input type="text" value="133"/> </div> </div> <div style="border: 1px solid black; padding: 5px; margin-top: 5px; text-align: center;"> <b>NorthBound</b>                      A: <input type="text" value="988"/>                      B: <input type="text" value="42"/> </div>		<b>V/C RATIO</b> 0.00 - 0.60 0.61 - 0.70 0.71 - 0.80 0.81 - 0.90 0.91 - 1.00	<b>LOS</b> A B C D E
--	---	--	---	-------------------------------------

A = Adjusted Through/Right Volume  
 B = Adjusted Left Volume  
 \* = ATSAC Benefit

---

### Results

North/South Critical Movements = A(N/B) + B(S/B)  
 West/East Critical Movements = A(W/B) + A(E/B)

V/C =  $\frac{988 + 80 + 133 + 127}{*1375} = 0.896$       LOS = D

## INTERSECTION DATA SUMMARY SHEET

N/S:  W/E:  I/S No:

AM/PM:  Comments:

COUNT DATE:  STUDY DATE:  GROWTH FACTOR:

Volume/Lane/Signal Configurations												
	NORTHBOUND			SOUTHBOUND			WESTBOUND			EASTBOUND		
	LT	TH	RT	LT	TH	RT	LT	TH	RT	LT	TH	RT
EXISTING	218	153	357	337	126	102	507	1114	514	68	1070	246
AMBIENT												
RELATED												
PROJECT												
TOTAL	218	153	357	337	126	102	507	1114	514	68	1070	246
LANE												
SIGNAL	Phasing		RTOR	Phasing		RTOR	Phasing		RTOR	Phasing		RTOR
	Split		Auto	Split		Auto	Prot-Var		Auto	Prot-Var		Auto

### Critical Movements Diagram

	<b>SouthBound</b> A: <input type="text" value="232"/> B: <input type="text" value="232"/>			
<b>EastBound</b> A: <input type="text" value="535"/> B: <input type="text" value="68"/>		<b>WestBound</b> A: <input type="text" value="557"/> B: <input type="text" value="507"/>	<b>V/C RATIO</b>	<b>LOS</b>
			0.00 - 0.60	A
			0.61 - 0.70	B
			0.71 - 0.80	C
			0.81 - 0.90	D
			0.91 - 1.00	E
A = Adjusted Through/Right Volume B = Adjusted Left Volume * = ATSAC Benefit				
<b>Results</b>				
North/South Critical Movements = A(N/B) + A(S/B) West/East Critical Movements = B(W/B) + A(E/B)				
$V/C = \frac{186 + 232 + 507 + 535}{*1375} = 0.992 \quad \text{LOS} = E$				

## INTERSECTION DATA SUMMARY SHEET

N/S:  W/E:  I/S No:

AM/PM:  Comments:

COUNT DATE:  STUDY DATE:  GROWTH FACTOR:

Volume/Lane/Signal Configurations												
	NORTHBOUND			SOUTHBOUND			WESTBOUND			EASTBOUND		
	LT	TH	RT	LT	TH	RT	LT	TH	RT	LT	TH	RT
EXISTING	190	2930	342	254	2823	117	390	67	188	86	65	86
AMBIENT												
RELATED												
PROJECT												
TOTAL	190	2930	342	254	2823	117	390	67	188	86	65	86
LANE	2                      0                      3                      0                      0                      1                      0	2                      0                      3                      0                      1                      0                      0	1                      1                      0                      0                      0                      1                      0	1                      0                      1                      0                      0                      1                      0								
SIGNAL	Phasing	RTOR		Phasing	RTOR		Phasing	RTOR		Phasing	RTOR	
	Prot-Fix	Auto		Prot-Fix	Auto		Split	Auto		Split	Auto	

### Critical Movements Diagram

	<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> <b>SouthBound</b>                      A: <input type="text" value="735"/>                      B: <input type="text" value="140"/> </div>			
	<div style="border: 1px solid black; padding: 5px; display: inline-block;"> <b>EastBound</b>                      A: <input type="text" value="65"/>                      B: <input type="text" value="86"/> </div>		<div style="border: 1px solid black; padding: 5px; display: inline-block;"> <b>WestBound</b>                      A: <input type="text" value="229"/>                      B: <input type="text" value="229"/> </div>	<b>V/C RATIO</b> 0.00 - 0.60 0.61 - 0.70 0.71 - 0.80 0.81 - 0.90 0.91 - 1.00
		<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> <b>NorthBound</b>                      A: <input type="text" value="977"/>                      B: <input type="text" value="105"/> </div>		<b>LOS</b> A B C D E

A = Adjusted Through/Right Volume  
 B = Adjusted Left Volume  
 \* = ATSAC Benefit

---

### Results

North/South Critical Movements = A(N/B) + B(S/B)  
 West/East Critical Movements = A(W/B) + B(E/B)

$V/C = \frac{977 + 140 + 229 + 86}{*1375} = 0.971$

LOS = E

CITY OF LOS ANGELES  
INTER-DEPARTMENTAL CORRESPONDENCE

**Letter No. 1**

DATE: December 21, 2004

TO: Nicholas Hendricks, Environmental Review Coordinator  
Planning Department

FROM: Adel Hagekhalil, Division Manager  
Wastewater Engineering Services Division  
Bureau of Sanitation

**General Plan Amendment Zone Change For Villa Marina Project**

This is in response to your Notice of Completion of a Draft of an Environmental Impact Report for the General Plan Amendment (from Limited Commercial to General Commercial for the Mixed Use project Site and Add Areas), Zone Change (Mixed Use Project area from M1 to RAS4 and add Area from M1 to C4), which is located at 13480, 13490 Maxella Avenue, 4350, 4356 Lincoln Boulevard. The Bureau of Sanitation, Wastewater Engineering Services Division (WESD), has conducted a preliminary evaluation of the potential impacts on the wastewater system for the proposed project.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Amount of Unit per Use	Average Daily Flow (GPD)
Multi-family Residence - 1BR	130/DU	60	7,800
Multi-family Residence - 2BR	180/DU	190	34,200
Multi-family Residence - 3 BR	230/DU	60	13,800
Retail / Commercial	80/1000GR.SQ.FT.	9,000	720
		Total	56,520

1-1

**SEWER AVAILABILITY**

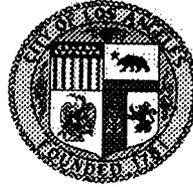
The sewer infrastructure in the vicinity of the proposed project includes an existing 8-inch VCP sewer line in Maxella Avenue, which feeds into a 12-inch sewer line in Washington Boulevard and an 8-inch sewer line in an easement in Marina Freeway, which feed into a 15-inch sewer line in the same easement. The current capacities of the 8-inch, the 12-inch and the 15-inch cannot be determined as gauging data for these lines is not available at this time. The design capacity for the 8-inch sewer lines at d/D of 50% is 256,000 Gallons per Day, and for the 12-inch sewer line at d/D of 50% is 676,000 Gallons per Day and for the 15-inch sewer line at d/D of 50% is 867,000 Gallons per Day.

A final determination for the local lines capacities will be done as part of the permit process and if insufficient capacity exist then the developer will be required to build a secondary line to connect the flow to the nearest lines with sufficient capacity. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the project.

If you have any questions, please call Belal Tamimi of my staff at (323) 342-6254.

Notice of Completion -- Villa Marina Project (TN.folder)

Letter No. 2  
CITY OF LOS ANGELES  
CALIFORNIA



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MAYOR

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ENVIRONMENTAL  
UNIT

November 18, 2004

Nicholas Hendriks, Environmental Review Coordinator  
Environmental Review Section  
Department of City Planning  
200 N. Spring Street, Room 761  
Los Angeles, CA 90012

**VILLA MARINA MIXED USE DEVELOPMENT**

PROJECT LOCATION

The area bounded by Lincoln Boulevard, Maxella Avenue, Glencoe Avenue, Mindanao Way, and SR 90 (Marina Freeway), excluding that portion occupied by the Marriot Hotel.

2-1

PROJECT DESCRIPTION

Demolition of 5 commercial buildings totaling approximately 30,000 square feet and construction of a mixed-use development consisting of 310 residential condominium units and 9,000 square feet of retail space. The area of the site is 4.04 acres.

The following comments are furnished in response to your request for this Department to review the proposed development:

2-2

A. Fire Flow

The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and this Department's judgment for needs in the area. In general, the required fire-flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along path of travel. Exception: Dwelling unit travel distance shall be computed to front door of unit.

2-2  
(cont.)

Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction.

Submit plot plans for Fire Department approval of access and fire hydrants.

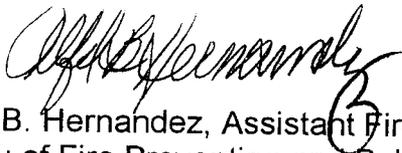
CONCLUSION

2-3

The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles C.P.C. 19708.

For additional information, please contact Inspector Kathleen White of the Construction Services Unit at (213) 482-6506.

WILLIAM R. BAMATTRE  
Fire Chief



Alfred B. Hernandez, Assistant Fire Marshal  
Bureau of Fire Prevention and Public Safety

ABH:KAW:gm  
c:Villa Marina

DEPARTMENT OF TRANSPORTATION  
DISTRICT 7, OFFICE OF PUBLIC TRANSPORTATION  
AND REGIONAL PLANNING  
IGR/CEQA BRANCH  
120 SOUTH SPRING STREET  
LOS ANGELES, CA 90012  
PHONE (213) 897-3747  
FAX (213) 897-1337



*Flex your power!  
Be energy efficient!*

December 21, 2004

Mr. Nicholas Hendricks  
City of Los Angeles, Planning Department  
200 North Spring Street, Suite 750  
Los Angeles, CA 90012

Re: *Villa Marina - Draft EIR*  
IGR/CEQA 041109/EA  
Vic. LA / 001 /PM 30.00 – 32.00  
SCH#2004081198

Dear Mr. Hendricks

We received a copy of the Draft Environmental Impact Report prepared for the proposed Villa Marina mixed-use development project. The project would include demolition of existing structures and construction of 310 residential condominium units, approximately 9,000 square feet of retail space, and space for up to 691 parking spaces. In the spirit of mutual cooperation through build-out of the project, we offer the following comments:

3-1

**General Comments**

- The proposed project will adversely affect the nearby highway's performance and increase congestion on the State's transportation facilities. The proposed project will generate additional trips that will utilize State highway facilities that are currently operating beyond acceptable levels. We advise that feasible transportation mitigation measures should be considered. This Department is responsible for maintaining the integrity of State highways, hence, our criteria for determining significant impacts supersedes that outlined in the Los Angeles County Congestion Management Program guidelines.
- Since the project site is adjacent to State right-of-way at the intersection State Route 1 (Lincoln Boulevard) and State Route 90 (Marina Freeway), grading work and construction would potentially impact State property, therefore, an encroachment permit would be required from this Department. We request the proposed project include right-of way impact protections in the form of a minimum dedication to add a deceleration lane from northbound Lincoln Boulevard to Maxella Avenue.
- Lincoln Boulevard is classified as a bike route and thus, the proposed project shall provide a bike lane facility within the project limits.
- Lincoln Boulevard shall be designed to State Standards within the project limits, lane widths shall be 3.6 meters and shoulders shall be 2.4 m. If the proposed project anticipates utilizing non-standard design features a Mandatory Design Exception will be required for Headquarter Approval. If it is anticipated, it is recommended to have the Mandatory Design Exception submitted early because the approval process may be lengthy.
- If existing on-street parking is to be eliminated, approval from the City will be required.

3-2

3-3

3-4

3-5

3-6

3-7

**Intersection of Lincoln Boulevard and Maxella Avenue**

- The traffic analysis in the Draft EIR found that the proposed project would significantly impact the intersection of Lincoln Boulevard (SR-1) and Maxella Avenue and, that due to right-of-way restrictions, mitigation measures would not be feasible. We request the lead agency and its traffic engineers consult with this Department to explore other traffic mitigation alternatives for this location. 3-8
- We request that left turn movements out of the proposed project location on to Maxella Avenue should be restricted. The driveway should be right turn out only. 3-9
- Trip Distribution Pattern (Appendix C, Figure 9) assumes no left turns traffic from southbound Lincoln Boulevard (SR-1) to eastbound SR-90. This assumption does not seem realistic. probability would suggest that motorists would prefer to take the shortest route to access SR-90. The assumption that the proposed project traffic would not generate left turn movement from Maxella Ave to Lincoln Boulevard would only be true if the left turn movement out of the proposed project location is restricted. 3-10

**Intersection of Lincoln Blvd and SR-90**

- The Draft EIR did not include the SR-90 realignment project that is scheduled to be in construction early 2007. This improvement will significantly impact traffic patterns to both Lincoln Boulevard and SR-90. We request the traffic analysis be revised to include this project when analyzing impacts due to the proposed project. 3-11
- We **do not** concur with the trip distribution. The Draft EIR shows that the intersection did not meet the significant impact criteria, an increase in the v/c ratio (0.009). We estimate the criteria for significance would be met without the flawed assumption that project related traffic would generate left turn movements from Maxella Avenue to Lincoln Boulevard. Therefore, again, we request the lead agency consult with this Department to develop possible feasible mitigation measures at this location. 3-12

If you have any questions, please call me at (213) 897-3747 or Elmer Alvarez of my staff at (213) 897-6696 and refer to IGR/CEQA record number 041109/EA.

Sincerely,



CHERYL J. POWELL  
IGR/CEQA Program Manager  
Caltrans, District 7

cc: Scott Morgan, State Clearinghouse

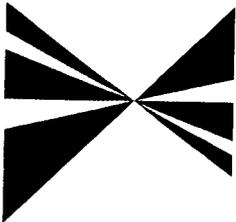
Letter No. 4

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SOUTHERN CALIFORNIA



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Los Angeles, California

90017-3435

t (213) 236-1800

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Riverside County: Marion Ashley, Riverside County • Thomas Buckley, Lake Elsinore • Bonnie Flickinger, Moreno Valley • Ron Loveridge, Riverside • Greg Pettis, Cathedral City • Ron Roberts, Temecula

San Bernardino County: Paul Biane, San Bernardino County • Bill Alexander, Rancho Cucamonga • Edward Burgnon, Town of Apple Valley • Lawrence Dale, Barstow • Lee Ann Garcia, Grand Terrace • Susan Longville, San Bernardino • Gary Ovitt, Ontario • Deborah Robertson, Rialto

Ventura County: Judy Mikels, Ventura County • Glen Becerra, Simi Valley • Carl Morehouse, San Buenaventura • Toni Young, Port Hueneme

Orange County Transportation Authority: Charles Smith, Orange County

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Bill Davis, Simi Valley

November 6, 2004

Mr. Nicholas Hendricks, Environmental Review Coordinator  
Environmental Review Section  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RE: SCAG Clearinghouse No. I20040753 Villa Marina Mixed-Use Project

Dear Mr. Hendricks:

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

4-1

We have reviewed the **Villa Marina Mixed-Use Project**, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). The proposed project is not a residential development of more than 500 dwelling units, or a proposed shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space. Therefore, the proposed Project does not warrant comments at this time. It is not necessary to send/provide us a copy of the Final EIR for this Project. However, please provide us with a Notice of Availability for the Final EIR. Please be sure that the Notice includes a complete project description and comment due date. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's **November 1-15, 2004** Intergovernmental Review Clearinghouse Report for public review and comment.

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

Sincerely,

JEFFREY M. SMITH, AICP  
Senior Regional Planner  
Intergovernmental Review



**Letter No. 5**

*To enrich lives through effective and caring service*



December 14, 2004

**Stan Wisniewski**  
Director

**Kerry Gottlieb**  
Chief Deputy

Mr. Nicholas Hendricks  
Environmental Review Section  
Department of City Planning  
200 N. Spring Street, Room 761  
Los Angeles, CA 90012

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**DEC 15 2004**

ENVIRONMENTAL  
UNIT

Dear Mr. Hendricks:

**VILLA MARINA MIXED USE PROJECT  
EAF NO. ENV-2004-3812-EIR; SCH 2004081198**

Thank you for sending our Department the Draft Environmental Impact Report for the above-referenced proposed project at the SE corner of Lincoln Blvd. and Maxella Avenue in the City of Los Angeles. The proposed project consists of two components: a 4.04-acre mixed-use development including 310 residential units, 9,000 square feet of retail space and 691 parking spaces; and, two add areas totaling 5.28 acres proposed for rezoning to increase compatibility with the land uses on and around the proposed project.

5-1

After careful analysis of this report and consideration of the possible project impacts, the Los Angeles County Department of Beaches & Harbors would like to offer the following comments:

- II. Project Description
  - B. Background & Existing Conditions

5-2

*Figure 2: Aerial View of Project Site and Surrounding Uses (Page 38)*

Only land uses in the City of Los Angeles are identified. No uses on Admiralty Way and Bali Way are labeled, although structures are clearly visible; please identify land uses.

- III. General Description of the Environmental Setting
  - B. Identification of Related Projects
    - 1. Cumulative Development

5-3

*Figure 9: Locations of Related Projects (Page 56) and  
Table 1: List of Related Projects (Page 57)*

Figure 9 and Table 1 do not adequately show related projects. In the City of Los Angeles, the third residential high-rise tower of the Water Terrace/Regatta complex currently under construction, and within a few blocks of the project, is not indicated on either the table or the map (Marina Pointe Drive).

The table provides a detailed description of Playa Vista development but not of Marina Del Rey development. The '#22' label indicating the location of Marina Del Rey development on the map suggests that all of this development is located 'off the map' in

a southeasterly direction. This is incorrect. There are a number of approved and "under construction" projects, which need to be included on this list. 5-3  
(cont.)

IV. Environmental Impact Analysis

A. Land Use

2. Environmental Setting

a. Existing conditions

(3) Regional Context

*Figure 10 Surrounding Land Uses (Page 61)*

Only land uses in the City of Los Angeles are identified. No uses on Admiralty Way and Bali Way are labeled, although structures are clearly visible; please identify land uses. 5-4

4. Cumulative Impacts (Page 80)

According to the text, "the related projects list includes no projects in the immediate vicinity of the proposed project site." The related projects list is deficient because it does not include the third residential high rise of the Regatta/Water's Edge complex on Marina Pointe Drive or any of Los Angeles County's Marina Del Rey projects. There are a number of approved and even "under construction" projects which need to be included on this list. 5-5

B. Traffic, Circulation and Parking

d. Existing Intersection Level of Service (Page 116)

*Figure 18 Study Intersections Relative to the Project Site (Page 118)*

The intersections at Admiralty/Mindanao, Admiralty/Bali and Admiralty/Fiji were not analyzed although they are within the vicinity of the proposed project. In addition, our Public Works Department has replied separately by letter of November 8, 2004, which further discusses traffic and circulation issues pertaining to this project. 5-6

E. Noise

1. Environmental Setting

b. Existing Local Noise Conditions

1. Noise-Sensitive Receivers (Page 172)

*Figure 21 Noise Sensitive Receptors and Measurement Locations (Page 174)*

The City of Los Angeles' Noise Thresholds Guide states that, "residences, schools, motels and hotels, libraries, religious institutions, nursing homes and parks are generally more sensitive to noise than commercial and industrial uses." There are three such facilities within the general vicinity of the proposed project that are clearly visible in Figure 21, but are not analyzed: 5-7

1. Kid's Pointe Day Care, 4311 Lincoln Blvd., City of Los Angeles

2. Los Angeles County Library/Marina Del Rey, 4533 Admiralty Way, Marina Del Rey
3. UCLA Medical Building, 4564 Admiralty Way, Marina del Rey

5-7  
(cont.)

VI. Growth-Inducing Impacts

2. Creation of Demand Not Satisfied within the project (Page 228)

5-8

General Comments:

The introduction of 663 new residents, 27 new employees as well as their dependents, family, friends and/or associates will have a direct impact on publicly-serving facilities in the general vicinity of the proposed project. In addition, the potential future redevelopment of the proposed areas may add significantly to these numbers. The City of Los Angeles is expected to provide many of the added public services required for this project. However, because of its location adjacent to Marina Del Rey, Los Angeles County public services may also be impacted. It is suggested that the impacts to the following services in the vicinity of the proposed project be further studied:

1. Admiralty Park
2. Burton Chace Park
3. Marina (Mother's) Beach
4. Los Angeles County Library/Marina Del Rey
5. South Bay Bicycle Trail
6. Los Angeles County Sheriff's Department patrols within Marina Del Rey

Thank you for this opportunity to provide comments on this proposed project.

If you have any questions, please contact Ms. Julie Carpenter, AICP, Planner, at 310-305-9530, or me, at (310) 305-9533.

Very truly yours,

STAN WISNIEWSKI, DIRECTOR



Joseph Chesler, AICP  
Chief, Planning Division

SW:JJC:mcm

cc: Department of Regional Planning (K. Johnson)  
Department of Public Works (B. Kurtz)



**Letter No. 6**  
**COUNTY OF LOS ANGELES**  
**DEPARTMENT OF PUBLIC WORKS**

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December 21, 2004

IN REPLY PLEASE  
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ENVIRONMENTAL  
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Mr. Nicholas Hendricks  
Environmental Review Section  
Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Dear Mr. Hendricks:

**REVIEW OF DRAFT ENVIRONMENTAL IMPACT REPORT  
VILLA MARINA MIXED-USE PROJECT  
CITY OF LOS ANGELES**

Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the Villa Marina mixed-use project. We have reviewed the DEIR and offer the following comments: 6-1

Solid Waste

Page B-38 of the Initial Study (Appendix A) states that solid waste from the project may be disposed at the Puente Hills Landfill. However, the Puente Hills Landfill does not accept waste originating in the City of Los Angeles. Therefore, the DEIR should be modified to reflect that waste will not be sent to the Puente Hills Landfill and discuss where this waste will be disposed. 6-2

Transportation/Circulation/Parking

We reviewed the Traffic Impact Study for this project. A copy of our November 8, 2004, letter is enclosed and the comments are still applicable. 6-3

Mr. Nicholas Hendricks  
December 21, 2004  
Page 2

If you have any questions regarding these comments, please contact Ms. Clarice Nash at (626) 458-5910.

Very truly yours,

DONALD L. WOLFE  
Interim Director of Public Works

A handwritten signature in cursive script that reads "Dennis Hunter". The signature is written in black ink and is positioned above the printed name and title of the signatory.

DENNIS HUNTER  
Assistant Division Engineer  
Land Development Division

CRN:jmw  
P:\CEQA\CLARICE\VillaMarinaEIR.doc

Enc.



# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (626) 458-5100  
www.ladpw.org

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

November 8, 2004

**RECEIVED**  
CITY OF LOS ANGELES

DEC 13 2004

ENVIRONMENTAL  
UNIT

IN REPLY PLEASE  
REFER TO FILE: T-4

Mr. Yu-Ying Chu  
Kaku Associates  
201 Santa Monica Boulevard, Suite 500  
Santa Monica, CA 90401

Dear Mr. Chu:

**VILLA MARINA RESIDENTIAL PROJECT  
TRAFFIC IMPACT STUDY (SEPTEMBER 2004)  
CITY OF LOS ANGELES**

We have reviewed the above-mentioned document for the proposed project located at the southeast corner of Lincoln Boulevard at Maxella Avenue, entirely within the City of Los Angeles. 6-4

The project is for the demolition of 30,000 square feet of commercial and retail uses housed in 5 buildings and the construction of a planned, landscaped residential community consisting of 310 condominium units, 9,000 square feet of commercial space, and associated parking and amenities. The site currently contains a Kinko's, Marie Challender restaurant, Carl's Jr. fast-food restaurant, Chan Darette Thai Noodle Bar and Grill restaurant, and a unknown commercial development at 13470 Maxella Avenue that appears to be vacant. The planned residential community consists of 60 one-bedroom, 190 two-bedroom, and 60 three-bedroom units. The commercial component would be developed in two separate spaces consisting of 5,000 and 4,000 square feet. The project at its Buildout Year 2008 is estimated to generate a net increase of approximately 1,290 vehicle trips per day, with 124 and 129 vehicle trips during the a.m. and p.m. peak hour, respectively.

We believe a project of this magnitude could potentially impact the roadways and intersections in Marina del Rey which is an unincorporated County area of Los Angeles. The study should be revised to include the project's potential impacts to Marina del Rey, including any necessary mitigation measures to mitigate any identified project impacts. 6-5

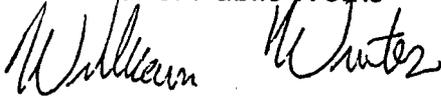
Mr. Yu-Ying Chu  
November 8, 2004  
Page 2

Additionally, Table 4 on page 19 (Map No. 22) provides for background conditions within the Marina per the Marina del Rey Local Coastal Plan (LCP), but no project specific information is provided. In addition, the referenced LCP footnote (2) is omitted. This information should be included in the study. 6-6

If you have any questions, please contact Mr. James Chon of our Land Development Review Section, Traffic and Lighting Division, at (626) 300-4709.

Very truly yours,

DONALD L. WOLFE  
Interim Director of Public Works



WILLIAM J. WINTER  
Assistant Deputy Director  
Traffic and Lighting Division

SFL:cn  
eir04316.doc

cc: City of Culver City (Samuel Romo)  
City of Los Angeles Department of Transportation (Jay Kim)  
City of Los Angeles Planning Division (Nicholas Hendricks)  
Department of Beach and Harbors (Joseph Chesler)

## Letter No. 7

November 9, 2004

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ENVIRONMENTAL  
UNIT

*Culver* **CITY**

Mr. Nicholas Hendricks, Environmental Review Coordinator  
Environmental Review Section  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

**RE: REQUEST FOR TIME EXTENSION FOR PUBLIC COMMENT  
PERIOD OF THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR  
VILLA MARINA MIXED USE DEVELOPMENT PROJECT**

Dear Mr. Hendricks:

The City of Culver City ("The City") is aware that a Draft Environmental Impact Report (EIR) was released on November 4, 2004, by City of Los Angeles for the proposed Villa Marina Mixed Use Project. The City acknowledges our responsibility and opportunity to comment on the proposed Draft EIR. As you are aware, the project site is adjacent to the boundaries of the City. As such, the proposed Villa Marina Mixed Use Project and the impacts of its operation are of critical interest to the Culver City community. 7-1

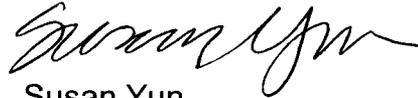
It is our understanding the Draft EIR has a 45-day review period. We feel this is not sufficient time to review and provide official Culver City comments by our City Council on the Draft EIR.

Based on the magnitude of the proposed project, we are requesting that the City of Los Angeles Planning Department provide a **60-day review** period of the Draft EIR.

Additional time is requested in order to distribute copies of the Draft EIR to City Council members and various City Departments for evaluation, prepare a staff report for City Council consideration, agendize/and notice this item to the community, and finally transmit Culver City's formal comments to the City of Los Angeles.

We appreciate your prompt attention to this matter and look forward to notice of an extension to the review period from your agency. Should you have questions or comments, please contact me at (310) 253-5755. 7-1 (cont.)

Sincerely,



Susan Yun  
Associate Planner

Copy: Ben Besley, Olson Company  
Susan Evans, Community Development Director  
Steve Cunningham, Transportation Director  
Charles Herbertson, Director of Public Works/City Engineer  
Mark Wardlaw, Deputy Community Development Director

## Letter No. 8

December 15, 2004

Mr. Nicholas Hendricks  
Environmental Review Section  
Department of City Planning  
City of Los Angeles  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

**RECEIVED**  
CITY OF LOS ANGELES  
DEC 20 2004  
ENVIRONMENTAL  
UNIT

*Culver* **CITY**

**Re: City of Culver City Comments on the November 2004 Draft Environmental Impact Report for Villa Marina Mixed-Use Project; 13480 and 13490 Maxella Ave. and 4350, 4356 and 4358 Lincoln Bl.**

Dear Mr. Hendricks:

Thank you for the opportunity to review and comment on the November 2004 Draft Environmental Impact Report (Draft EIR) for the Villa Marina Mixed-Use Project. 8-1

This letter transmits the City of Culver City's (the "City") comments on the Draft EIR which are provided in Resolution No. 2004-R095, including Exhibit A, which the Culver City City Council approved on Monday, December 13, 2004.

The City appreciates the time and effort that went into the preparation of the 2004 Draft EIR. However, there are several issues, which are of concern to Culver City regarding the 2004 Draft EIR.

We look forward to receiving the response to comments to the Draft EIR. Should you have any questions, I can be reached at (310) 253-5755.

Sincerely,



Susan Yun  
Associate Planner

(Attachments and distribution next page):

Attachment:

1. City Council Resolution No. 2004-R095 including Exhibit A

Copy:

Honorable Mayor and City Council Members, City of Culver City  
Jerry Fulwood, Chief Administrative Officer  
Deborah Fancett, Assistant Chief Administrative Officer  
Susan Evans, Community Development Director  
Charles D. Herbertson, Public Works Director/City Engineer  
Steve Cunningham, Transportation Director  
Carol Schwab, City Attorney  
John Montanio, Police Chief  
Jeff Eastman, Fire Chief  
Mark Wardlaw, Deputy Community Development Director  
David McCarthy, Deputy City Attorney  
Lt. Dave Tankenson, Police Lieutenant  
Robert Bruce, Fire Marshall  
Sammy Romo, Traffic Engineer  
Heather Burton, Management Analyst  
Ben Besley, Olson Company

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**RESOLUTION NO. 2004-R0 95**

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CULVER CITY, CALIFORNIA, TRANSMITTING THE OFFICIAL CITY RESPONSE TO THE NOVEMBER 2004 DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED VILLA MARINA MIXED USE PROJECT LOCATED AT 13480 AND 13490 MAXELLA AVE. AND 4350, 4356 AND 4358 LINCOLN BLVD.

WHEREAS, the City of Los Angeles is proposing to adopt the Villa Marina Mixed Use Project located at 13480 and 13490 Maxella Ave. and 4350, 4356 and 4358 Lincoln Blvd., which is located approximately ½ mile south of the western boundary of the City of Culver City; and

WHEREAS, the proposed project consists of two components; the development of a mixed use project consisting of residential and retail uses (the "Mixed Use Project") and two parcels for which the City of Los Angeles is initiating a Community Plan Amendment and Zone Change in order to create land use designations that are consistent with existing uses on and around the subject parcels (the "Add Areas"); and,

WHEREAS, the project site consists of a total of 9.32 acres. Of this total, the Mixed Use Project would occupy 4.04 acres, while the Add Areas would comprise the remaining 5.28 acres; and,

WHEREAS, the Mixed Use Project consists of 310 residential condominium units, and 9,000 square feet of retail uses. Parking accommodations include a one-level subterranean, second-level podium, surface level parking totaling 691 spaces; and,

WHEREAS, the City of Los Angeles has prepared a Draft EIR dated November 2004 to analyze potential environmental impacts caused by the proposed Mixed

8-2

1 Use Project, which was released for public review and comment on November 4th, 2004;  
2 and,

3 WHEREAS, a City staff team, consisting of various City Departments and  
4 consultants was established to evaluate and comment on the adequacy of the Draft EIR in  
5 addressing potential impacts to Culver City; and,

6 WHEREAS, the City Council of the City of Culver City, accepted public  
7 comments and considered the Draft EIR at public meetings on November 22, 2004 and  
8 December 13, 2004.

9 NOW, THEREFORE, the City Council of the City of Culver City, California,  
10 DOES HEREBY RESOLVE as follows:

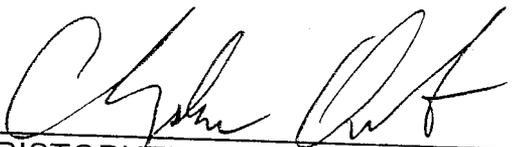
11 1. Establishes that this Resolution, including attached Exhibit A,  
12 constitutes the City of Culver City's official comments on the November 2004 Draft EIR that  
13 was prepared for the proposed Villa Marina Mixed Use Project.

14 2. Directs and authorizes staff to transmit comments of the City of Culver  
15 City on the Draft EIR to the City of Los Angeles.

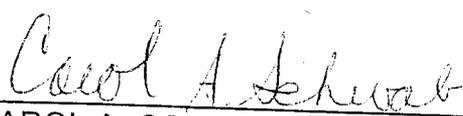
16 APPROVED and ADOPTED this 13th day of December 2004.

17  
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22   
23 STEVEN J. ROSE, MAYOR  
City of Culver City, California

24 ATTEST:

25  
26   
27 CHRISTOPHER ARMENTA, City Clerk

28 APPROVED AS TO FORM:

  
CAROL A. SCHWAB, City Attorney

(jam)

**EXHIBIT A - CITY OF CULVER CITY RESOLUTION NO. 2004- R095**  
**Villa Marina Mixed-Use Project Draft EIR Comments**  
**(13480 and 13490 Maxella Ave. and 4350, 4356 and 4358 Lincoln Blvd.)**  
**December 13, 2004**

General Comments

1. The City of Culver City was not notified and did not receive the Notice of Preparation (NOP) of a Draft EIR for the Villa Marina Mixed-Use project during the 30-day public review period (September 2 - October 1, 2004). The City of Culver City's border is within close proximity (½ mile of the project site) and would be reasonably impacted by the implementation of this proposed project. Please add us to your notification list and inform of us any future public meetings or hearings on this project. Because we were not notified during the NOP stage, we were unable to provide the Lead Agency with early comments on the scope and content of the Draft EIR and associated technical studies. 8-3

Traffic

2. *Glencoe/Washington Mitigation Measure Infeasibility.* The DEIR identifies, as a traffic mitigation measure for the intersection of Glencoe Avenue and Washington Boulevard, the installation of an additional left turn lane for Washington Boulevard into Glencoe Avenue. Implementation of this mitigation measure would result in prohibiting parking along the south side of Washington Boulevard, eliminating 6 parking spaces. However, the number of parking spaces lost would exceed 6. Additional curbside parking spaces would be lost on the west side of Glencoe Avenue south of the intersection, and along the south side of Washington Boulevard to the west of the intersection. There is no discussion of the parking impacts created by the loss of these on-street spaces and how they will be replaced. The impact of this loss of parking spaces on Washington Boulevard to the adjoining businesses should be evaluated. Additionally, the loss of these metered parking spaces will have a financial impact to Culver City in terms of lost parking meter revenue. This impact was not addressed and no mitigation measures were provided. 8-4
3. A more significant problem with the proposed mitigation measure is that Glencoe Avenue is too narrow a street to accept traffic fed by two left turn lanes. Currently, Glencoe Avenue is striped to allow for a single lane in the southbound direction with a width of 21 feet. Ideally, the receiving end of dual left turn lanes should be 30 feet, or an average of 15 feet per lane. This width could be lessened, depending on whether the turn radii of the expected traffic mix could be handled by the receiving lanes. In any case, the 21-foot width is certainly too tight to accommodate dual left turn lanes. Glencoe Avenue would have to be widened by at least 5 feet. Because the right-of-way 8-5

between the property line and curb line appears to be about 8 feet, this would require the acquisition of right-of-way from the adjacent property to provide a minimal 6-foot wide sidewalk. The City of Culver City has expended significant efforts to improve the aesthetics of the public right-of-way to improve the quality of life and enhance the economic development of businesses and the Community. The resulting impacts of creating a barren utilitarian streetscape in this area as well as the required right-of-way acquisition should be identified in the DEIR.

8-5  
(cont.)

4. Even if Glencoe Avenue were widened immediately south of Washington Boulevard, a further problem would occur farther to the south, at the intersection of Beach Avenue. The two southbound lanes of Glencoe Avenue would have to merge into a single lane south of Beach Avenue, but the alignment of Glencoe Avenue is too severely offset to provide an acceptable lane transition. The traffic problems resulting from the increased traffic on Glencoe in conjunction with this difficult lane transition is not addressed in the DEIR. The project will need to identify another mitigation measure for this intersection. Otherwise the intersection will have an unmitigated significant impact.

8-6

5. In appendix C, Traffic Study, page 14, table 3 shows that the current (2004) LOS is B for the intersection of Lincoln Boulevard and Washington Boulevard in the AM peak hour. In the Playa Vista Draft Environmental Impact Report, it shows the same intersection is operating at LOS D for 2003 in the AM peak hour. The Cumulative Base V/C ratio should be re-evaluated and compared to the Cumulative Plus Project V/C ratio for this intersection.

8-7

Related and Cumulative Impacts

6. The Related Projects section is inadequate and several projects within the site's vicinity have been omitted. The EIR indicates there are 24 cumulative projects within the study area. The latest cumulative project list for Culver City contains 27 projects of which only two are included in the cumulative project list in the traffic section of the EIR. The traffic study for the EIR does not include Phase 2 of the Playa Vista Project which will generate a significant amount of traffic in the project study area. Project 22 (Table 6) in the cumulative project list of the traffic study indicates "Marina Del Rey Development" but does not identify the characteristics of these projects. As such, it is unclear that the amount of traffic generated by these projects is being accounted for correctly and adequately addressed in the EIR. Given the number of major projects omitted from the cumulative project list, this means the future without project and future with project traffic conditions and associated impacts may be understated and inadequately addressed. Thus the future no project and with project scenarios should be reanalyzed to

8-8

ensure the intersection levels of service are correctly reported and additional mitigation measures, if any, identified. 8-8  
(cont.)

7. The List of Related Projects on page 57 includes projects that will provide over 5,000 new housing units in the immediate Villa Marina project area. While the number of vehicle trips and person trips on transit generated by the proposed project may be below impact criteria at most of the study intersections, the cumulative impacts of this new housing supply has the potential to significantly impact quality of life for neighboring Culver City residents and decrease the supply of seating for transit passengers, among other concerns. Villa Marina, in conjunction with other local projects, may have to look beyond typical mitigation measures if it hopes to be a good neighbor. 8-9

Transportation

8. The existing transit service analysis does not include Culver CityBus line 2. Line 2 runs hourly on weekdays from the Fox Hills Mall Transit Center north on Inglewood to westbound Washington, making a loop on Lincoln to Venice to Beethoven and back to the Mall. Reference to "seven" existing transit lines should be changed to "eight" on pages 21, 115, 116, 129 and pages 13 and 15 of the Traffic Study. 8-10
9. Executive Summary, page 21. In the first sentence of the second paragraph, it states that the project would only increase public transit ridership by six trips. Please specify whether these are six person trips or bus trips. 8-11
10. The DEIR estimates that the mixed use project would increase public transit ridership by 6 trips in the p.m. peak hour. However, there is no explanation of the methodology behind this calculation, nor is there any estimate of transit impacts during the a.m. peak hour. The site's proximity to a designated Congestion Management Program transit corridor, multi-modal transportation center, or transit center is not clear; this proximity is usually the basis for the transit impact calculation. Both Lincoln and Washington Boulevards meet the criteria for designated CMP transit corridors. The percentage of new trips that are expected to be made by transit should be defined (and in the case of the a.m. peak period, provided). Culver City cannot evaluate impacts without knowing what they may be or how they were calculated. 8-12
11. Culver CityBus lines 1 and 2 are dramatically impacted by traffic in the Washington/Glencoe/Lincoln area. Not only is congestion severe, but bus operators also confirm that traffic signals are not well synchronized in this stretch. On a regular basis buses fall behind by five or more minutes when traveling in the Lincoln to Redwood segment of Washington Boulevard. Running behind schedule can have a significant and negative impact on all 8-13

bus passengers, not only those on or waiting for the bus, but those who may be turned off from transit when its reliability is reduced. The DEIR does not analyze any potential impacts to transit bus running times in general, and there is no analysis whatsoever on the impact to transit service at Washington/Glencoe. Furthermore, although there is mitigation provided for westbound Washington Blvd. at Glencoe, there is nothing proposed to mitigate eastbound traffic at this intersection. The eastbound approach is where Culver City buses fall farthest behind schedule.

8-13  
(cont.)

Construction Impacts

8-14

12. There is minimal discussion in the Draft EIR of traffic and parking impacts in Culver City during construction. Major construction projects involve a substantial amount of traffic from construction workers and suppliers, much of which involves trucks and heavy equipment. Street closures are common, and parking areas are often used for staging areas. The document should analyze traffic impacts from construction vehicles, workers, temporary road closures, parking needs of construction employees, and the loss of available parking due to use of parking areas for construction staging and equipment storage. The DEIR should include a mitigation measure calling for the preparation of a construction traffic control plan, with the provision that the Culver City Traffic Engineer will be consulted during the preparation of the plan. The traffic control plan should include a requirement that construction staging occur in locations that minimize impacts on adjacent residential neighborhoods and Culver City streets.

13. There is no explanation or map of potential haul routes for construction vehicles and/or analysis of possible impacts on Culver City. The use of approved Culver City haul routes and schedules should be included as a mitigation measure if routes pass through Culver City.

8-15

14. The DEIR provides no information on parking for construction personnel and potential overflow parking into local neighborhoods. Circling for on-street spaces by local residents and/or construction personnel can decrease local air quality.

8-16

Air Quality/Circulation

15. The DEIR includes no analysis of the number of truck trips that are estimated to remove the 100,000 cubic yards of earth and potential impacts on air quality, on local streets, and on the performance of transit service.

8-17

16. Because construction of the mixed use development will still result in regional NOx emissions that exceed the SCAQMD regional daily significance

8-18

threshold even after mitigation, Culver City would encourage the imposition of additional mitigation measures to reduce vehicle trips (and therefore NOx emissions). Rideshare and transit incentives to construction personnel should be provided. Culver CityBus would look forward to working with the project developers to institute a bus pass program.

8-18  
(cont.)

17. Culver City recommends the following additional air quality mitigation measures be included to reduce air quality impacts:

8-19

- Low sulfur fuel shall be used for construction equipment.
- The project sponsor should ensure efficient parking management as to reduce impacts on local neighborhoods and avoid construction personnel parking in lots for neighboring businesses.

Land Use

8-20

18. The project proposes a Community Plan Amendment and Zone Change from Industrial to Commercial for the "Add Areas" of the project (i.e., areas where no new development is proposed). The EIR does not analyze the potential conversion from industrial to commercial use (the existing land use is commercial, a hotel and gasoline filling station). Even though there is no conversion of industrial uses that would be facilitated by the proposed project, the EIR should provide an analysis of any potential impact of this proposed zoning conversion.

19. The Draft EIR identifies 40 parking spaces allocated for the proposed 9,000 square foot area designated for retail uses. However, should a restaurant use occupy a portion this space, the 40 parking spaces proposed might not be enough as the parking demand for a restaurant use is more intensive than a typical retail use. This may lead to surrounding traffic congestion and overflow parking impacts.

8-21

20. The analysis of potential project impacts on surrounding land uses does not consider Culver City. The Community Plan Land Use Designations map shown in Figure 11 on page 68 is split in half by the City of Culver City; however it is as if the Palms-Mar Vista-Del Rey Community Plan exists in a vacuum. Likewise, the list of related projects does not include any new developments in Culver City.

8-22

Letter No. 9

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CITY OF LOS ANGELES

NOV 16 2004

ENVIRONMENTAL  
UNIT

November 11, 2004

Mr. Nicholas Hendricks  
Environmental Review Coordinator  
Department of City Planning  
200 N. Spring Street, Room 761  
Los Angeles, CA 90012

RE: Proposed Maxella and Lincoln development

Dear Mr. Hendricks,

As a property owner in the area, I am deeply concerned about the impact that the proposed development at Maxella Avenue and Lincoln Blvd. in Marina del Rey will have on the area. I understand the desirability of increased revenues to the city by such development, but recent expansion in the area is making traffic unbearable. The congestion will increase significantly as the Playa Vista project is completed. Even though people are expected to use the freeway to get North or South, the 405 freeway is becoming so congested that many are now using the surface streets as an alternative route, adding to the congestion. The proposed development referenced above will only add to the already significant congestion. I hope you will reconsider your support for this project.

9-1

Sincerely,



Ross Latimer

Letter No. 10

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CITY OF LOS ANGELES  
NOV 22 2004  
ENVIRONMENTAL  
UNIT

4330 Glencoe Ave. #2  
Marina Del Rey, Ca  
90292

Nov. 19, 1904

To: Nicholas Hendricks  
Environmental Review Section  
Dept. of City Planning

Dear Sir:

This note is re: "Project  
considered on Maxella v  
Lincoln Blvd."

We are a 31 year  
resident in Villavelletri, (sorry)  
a condo project, across  
from your proposed project.  
We are a 232 unit group.  
You are proposing 310  
residential units, and  
691 parking spaces. That  
is absurd - 691 for  
your whole project? We  
have 2 spots for each

10-1

condo, which is realistic.

10-1  
(cont.)

Also, we are surrounded by condos and apartments and Playa Vista. Judging from signs, the occupancy rate is low. Why do we need more? Traffic is horrendous now - I can scarcely get out of my driveway.

10-2

So - we totally oppose the magnitude of this project.

Sincerely,  
Eileen S. Randall  
for: Mr. and Mrs  
Tom. A. Randall

P.S. Until we receive more information, we're against the whole proposal.