Appendix C:
Comments Received in Response to NOP and Scoping Meeting
April 10, 2015

Mr. Sergio Ibarra
Department of City Planning, Environmental Analysis Section
200 North Spring Street, Room 750
Los Angeles CA 90012

Subject: Cumulus Transit Oriented/Mixed-Use Project (ENV-2014-4755-EIR)

Dear Mr. Ibarra:

The residents and stakeholders of Baldwin Hills Estates Homeowners Association have serious concerns regarding the Cumulus Transit Oriented/Mixed-Use Project. As a community we agree with all the environmental factors potentially affected and outlined in the Initial Study (Aesthetics, Air Quality, Biological, Cultural Resources, Geology/Soils, Greenhouse Gas Emissions, Hazards & Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Noise, Population/Housing, Public Services, Recreation, Transportation/Traffic, Utilities/Services Systems, and Mandatory Findings of Significance).

The most common comments from our March 28, 2015, General Association Meeting was regarding the traffic and circulation impacts on the community, and the negative impact on our property values as a result of the potential construction of the 300 ft. tower blocking our scenic views.

If you have any questions please feel free to contact me at 213.200.0312.

Sincerely,

Carl Eric Morgan
President BHEHOA

cc: Executive Committee
    Empowerment Congress West Area Neighborhood Development Council
DATE: April 9, 2015

TO: Sergio Ibarra, City Planning Associate
    Department of City Planning

FROM: Ali Poost, Division Manager
    Wastewater Engineering Services Division
    LA Sanitation

SUBJECT: CUMULUS TRANSIT ORIENTED MIXED-USE PROJECT: NOTICE OF PREPARATION-EIR

This is in response to your March 12, 2015 letter requesting a review of your proposed mixed-use project located at 3351 S. La Cienega Blvd and 5707 W. Jefferson Blvd, Los Angeles, CA 90016. The Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

WASTEWATER REQUIREMENT

LA Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvements projects needed to provide future capacity as the City grows and develops.

Projected Wastewater Discharges for the Proposed Project:

<table>
<thead>
<tr>
<th>Type</th>
<th>Description</th>
<th>Average Daily Flow per Type Description (GPD/UNIT)</th>
<th>Proposed No. of Units</th>
<th>Average Daily Flow (GPD)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing</td>
<td>Office</td>
<td>120 GPD/1000 SQ.FT</td>
<td>63,313 SQ.FT</td>
<td>(633)</td>
</tr>
<tr>
<td>Proposed</td>
<td>Residential: 1-BDRM</td>
<td>110/ DU</td>
<td>852 DU</td>
<td>93,720</td>
</tr>
<tr>
<td></td>
<td>Residential: 2-BDRMS</td>
<td>150/ DU</td>
<td>366 DU</td>
<td>54,900</td>
</tr>
<tr>
<td></td>
<td>Office</td>
<td>120 GPD/1000 SQ.FT</td>
<td>200,000 SQ.FT</td>
<td>24,000</td>
</tr>
<tr>
<td></td>
<td>Retail</td>
<td>50 GPD/1000 SQ.FT</td>
<td>80,000 SQ.FT</td>
<td>4,000</td>
</tr>
<tr>
<td></td>
<td>Restaurant</td>
<td>300 GPD/1000 SQ.FT</td>
<td>20,000 SQ.FT</td>
<td>6,000</td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td></td>
<td></td>
<td>181,987</td>
</tr>
</tbody>
</table>

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes an existing 8-inch line on La Cienega Blvd. The sewage from the 8-inch line feeds into a 93-inch line on Jefferson Blvd before discharging into a 126-inch sewer line on Vista Del Mar. Figure 1 shows the details of the
sewer system within the vicinity of the project. The current flow level (d/D) in the 126-inch line cannot be determined at this time without additional gauging.

The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

<table>
<thead>
<tr>
<th>Pipe Diameter (in)</th>
<th>Pipe Location</th>
<th>Current Gauging d/D (%)</th>
<th>50% Design Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>8</td>
<td>La Cienega Blvd.</td>
<td>45</td>
<td>229,323 GPD</td>
</tr>
<tr>
<td>99</td>
<td>La Cienega Blvd.</td>
<td>45</td>
<td>84.03 MGD</td>
</tr>
<tr>
<td>93</td>
<td>Jefferson Blvd.</td>
<td>8</td>
<td>112.46 MGD</td>
</tr>
<tr>
<td>126</td>
<td>Vista Del Mar</td>
<td>*</td>
<td>113.03 MGD</td>
</tr>
</tbody>
</table>

* No gauging available

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. 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 Kwasi Berko of my staff at (323) 342-1562.

STORMWATER REQUIREMENTS

The Bureau of Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

The project requires implementation of stormwater mitigation measures. These requirements are based on the Standard Urban Stormwater Mitigation Plan (SUSMP) and the recently adopted Low Impact Development (LID) requirements. The projects that are subject to SUSMP/LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled "Development Best Management Practices Handbook – Part B: Planning Activities". Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lastormwater.org. It is advised that input regarding SUSMP requirements be received in the early phases of the project from WPD’s plan-checking staff.

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to
improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the SUSMP/LID requirements.

CONSTRUCTION REQUIREMENTS

The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturb more than one-acre of land are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction.

If there are questions regarding the stormwater requirements, please call Kosta Kaporis at (213) 485-0586, or WPD’s plan-checking counter at (213) 482-7066. WPD’s plan-checking counter can also be visited at 201 N. Figueroa, 3rd Fl, Station 18

SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact Daniel Hackney of the Special Project Division at (213)485-3684.

KB\AP:tn

Attachment: Figure 1 – Sewer Map

c: Kosta Kaporis, LASAN
   Daniel Hackney, LASAN
   Eduardo Perez, LASAN
FIGURE 1
Cumulus Transit Oriented Mixed-Use Project
Sewer Map
April 22, 2015

Mr. Sergio Ibarra  
Environmental Analysis Section  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Dear Mr. Ibarra

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-mentioned project. The proposed project involves demolition of existing buildings and the two radio towers and construction of an approximately 1.9 million square feet of mixed-use development. The project may include 1218 multi-family residential units and up to 300,000 square feet of commercial floor area on the lower ground floors. The commercial space would include 200,000 square feet of office space, 50,000 square feet of grocery store, 20,000 square feet of restaurant space, and 30,000 square feet of general retail.

As the State agency with jurisdiction over State highway transportation facilities, Caltrans is concerned with the potential increase in traffic volumes that the project may generate, which would be directed to the I-10 freeway and State Route 187 (Venice Blvd.). The increase in additional traffic might further exacerbate existing congestion on these two facilities.

Caltrans’ mission is “to provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability.” Through the Local Development/Intergovernmental Review (LD-IGR) Program Caltrans reviews land use projects and plans to ensure consistency with our mission and state planning priorities of infill, conservation, and efficient development. To ensure a safe, efficient, and reliable transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multi-modal transportation network.

Caltrans understands that the addition of Metro’s Expo Line Phase 2 will extend light rail transit access from Downtown Los Angeles to the City of Santa Monica and the Crenshaw/LAX Line will extend Light Rail Transit service to Los Angeles International Airport (LAX). Thus, vehicular traffic impacts to freeways from the proposed Cumulus development could be reduced somewhat if future occupants shift to public transit for some of their inter-regional trips. Caltrans recommends the project include safe and convenient pedestrian and bicycle access to the Metro station.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability"
Please require that the project evaluate potential transportation impacts to I-10 Santa Monica Freeway associated with this project and from future growth in the surrounding area in a Traffic Impact Analysis (TIA). The TIA should include evaluation of potential traffic impacts to the regional transportation system including I-10 on-and-off ramps to/from La Cienega Boulevard and Fairfax Avenue. Please include mitigation improvements if the off-ramp storage capacity is projected to be exceeded to avoid vehicle queues to extend to freeway through lanes.

Please refer traffic engineers to follow the Caltrans Guide for the Preparation of Traffic Impacts Studies, it is accessible online at: [http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf](http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf)

Listed below are elements of what Caltrans generally expects in a traffic impact study:

- Presentations of assumptions and methods used to develop trip generation, trip distribution, trip assignments, and choice of travel mode. Travel modeling should be consistent with other regional and local modeling forecasts and with travel data.
- Inclusion of all appropriate traffic volumes. Analysis should include a) traffic from the project under consideration, b) cumulative traffic from all specific approved developments in the area, c) cumulative traffic from likely not-yet-approved developments in the area, and d) traffic growth other than from the project and developments. Any assumptions of vehicle trip reductions due to existing uses, internal captured trips, pass-by trips, or transit usage needs to be justified.
- Analysis of AM, and PM peak-hour volumes for both existing and future conditions in the affected area. Future conditions should extend to horizon year of the community plan.
- Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts, including a description of transportation infrastructure improvements, financial costs, funding sources and financing, sequence and scheduling considerations, implementation responsibilities, controls and monitoring.
- A plan of realistic mitigation measures under the control of the lead agency or project sponsors or specification percent shares of the costs for various mitigation actions undertaken by other agencies. Any traffic mitigation fees may be assessed proportionally with the additional traffic generated by the project. (See Caltrans’ Traffic Impact Study Guide for a suggested formula).

Please be aware that although the lead agency is required to comply with Los Angeles County Congestion Management Program (CMP) standards and thresholds of significance, Caltrans does not consider the Los Angeles County’s CMP criteria alone to be adequate for the analysis of transportation impacts pursuant to a CEQA review. The CMP does not adequately address cumulative transportation impacts and does not analyze for safety, weaving problems, or delay. The 2010 CMP Guidelines, Appendix D, states that Caltrans should be consulted for the analysis of State highway facilities. Caltrans’ Guide directs preparers of traffic impact analysis to consult with the local District as early as possible to determine the appropriate requirements of the traffic impact analysis.

In the spirit of mutual cooperation, Caltrans staff is available to work with the project’s traffic engineers to identify the parameters of traffic impact analysis such as study area, vehicle trip reduction factors, method of analysis, significant criteria, and possible mitigation measures if any are necessary.

“Provide a safe, sustainable, integrated and efficient transportation system
to enhance California’s economy and livability”
Mr. Sergio Ibarra  
April 22, 2015  
Page 3  

If you have any questions regarding these comments, please feel free to contact me at (213) 897 – 9140 or project coordinator Elmer Alvarez at (213) 897-6696 or electronically at elmer.alvarez@dot.ca.gov.

Sincerely,

DIANNA WATSON  
IGR/CEQA Branch Chief  
Caltrans District 7  

cc: Scott Morgan, State Clearinghouse

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability"
April 13, 2015

Sergio Ibarra  
Department of City Planning, Environmental Analysis Section  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Subject: Comments on the Notice of Preparation for the Cumulus Transit Oriented/Mixed Use Project Environmental Impact Report (ENV-2014-4755-EIR) Located in the City of Los Angeles.

Dear Mr. Ibarra:

Thank you for the opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the Cumulus Transit Oriented/Mixed Use Project located at the corner of Jefferson Boulevard and La Cienega Boulevard, in the City of Los Angeles. Our specific comments are attached for your use in preparing the Draft EIR.

We look forward to reviewing the Draft EIR when it is released and working with you to make this project a successful addition to the community. Please contact me at (310) 253-5755 if you have any questions regarding this letter.

Sincerely,

Susan Yun  
Senior Planner

Attachments: 1. Detailed list of Comments on the Notice of Preparation
City of Culver City

General Comments

1. We request that a Draft EIR review period of at least 60 days be granted to enable us to conduct a careful review and the opportunity to work cooperatively with your project team to resolve any issues that may arise. Culver City City Council considers EIR comments to achieve citizen participation.

2. Please include within the notification of the Draft EIR – Culver City Neighborhoods such as the East Culver City Neighborhood Alliance, Rancho Higuera Neighborhood, Blackwielder/Smiley area and the Hayden Tract area.

3. Since traffic, is such a critical issue, we would also ask that our City traffic engineer be offered the opportunity to work with your staff and consultant in preparation and review of the traffic studies prior to Draft EIR publication. The contact person at the City for traffic issues is Barry Kurtz (310-253-5613). Planning staff would like to also request that an Administrative version of the Draft EIR be available to us to review before the Draft EIR publication. This early collaboration would help to streamline Culver City’s review of the Draft EIR by allowing issues to be fully explored before the Draft EIR is published, thereby reducing the likelihood of additional analysis and delays during the response to comments phase.

4. Based on the NOP, Culver City’s initial environmental areas of focus are impacts to our community as it relates to Traffic, Construction, Transit (City Bus), Parks/Recreation services, and Fire and Police services. Once the Draft EIR is prepared we will be able to comment on additional areas of concern. Please ensure adequate analysis and mitigations are included in the Draft EIR related to these topics. Some of our standards and rules vary from the City of Los Angeles’s standards (i.e. Traffic standards, Construction hours, haul routes, etc.) Therefore, we ask you consult with us as you prepare the Draft EIR regarding our standards and thresholds.

5. In order to fully understand the project’s scope, we need an up to date project description. At the community meeting held on March 25, 2015, the conceptual plans did not show any office uses on the plans. However the NOP indicates that there will be about 200,000 sf of office space. Please provide us with a copy of the most current Entitlement level plans that include a site plan, elevations, floor plans, parking plan, circulation plan, and landscaping/open space plans. Please provide a summary of total square footages by use type and parking totals and areas.
Traffic

6. Based on the size of the Cumulus Mixed-Use development, we expect that traffic generated by the project will have a significant impact on several intersections in the City of Los Angeles and in Culver City. Some of the intersections that may be potentially impacted are La Cienega/Fairfax, La Cienega/Jefferson and National/Washington. With the intersection of La Cienega/Jefferson being a portal to Culver City, we believe it would be appropriate to widen Jefferson Boulevard and La Cienega Boulevard along the Project’s frontage to provide additional capacity at the intersection for all modes of transportation.

7. Culver City’s Traffic Engineer has requested the below listed changes and corrections to the Traffic Study MOU for this 1.9 million square-foot TOD, mixed-use development at the northwest corner of La Cienega Boulevard and Jefferson Boulevard. We anticipate the project’s traffic study will determine any mitigation measures required in Culver City.

   a. Verify the existing active land uses.
   b. In Table 1, Under Trip Generation Rates, for Supermarket change ITE 950 to ITE 850. The PM Peak Hour total should be 9.48. Under Proposed Project, Grocery Store PM Peak Hour should be 474.
   c. In the list of intersections indicate the jurisdiction. Add to the list the intersections Culver Boulevard/Main Street and Sepulveda Boulevard/Slauson Avenue.
   d. Show turning percentages and volumes at the project’s driveways.
   e. We request the traffic distribution reflect higher distributions to LAX and points south via La Cienega Boulevard and Slauson Avenue and to Marina del Rey and points west. Accordingly we recommend the following adjustments:
   f. Intersection 16 La Cienega/Washington, Show about 3% northbound left turns.
   g. Intersection 22 Washington/National shows 12% WB through. That percentage should be carried to intersection 36 Washington/Ince and further west via Washington Boulevard.
   h. Intersection 26 La Cienega/Jefferson, A higher % (20%) should distribute southbound. At Intersection 30 La Cienega/Rodeo a higher % (18%) should distribute southbound. At Intersection 33 La Cienega/Stocke r a higher % (16%) should distribute southbound. At 47 La Cienega/Slauson a higher % (11%) should distribute westbound.

Transit (CulverCity Bus)

Please examine the following items in the Draft EIR /traffic study:

8. Impacts of the project’s generated trips will have on Culver City’s transit system on the route level on the following:
a. Impacts on the residual capacity (anticipated demand on public transit due to the project and impacts of such demand on existing and anticipated residual transit capacity).

b. Impacts on transit operation travel time (how the bus operations travel time will be impacted).

9. If the project is claiming TDM credit and/or transit credit, there needs to be reasonable justifications for such credits. If the transit credit is more than the countywide average on transit modal share as stated in Metro’s 2010 Congestion Management Program guidelines, the traffic study should look at the true impacts the project will have on transit residual capacity and travel time (Item 1 above) with transit credit that is based on the transit modal share in Metro’s 2010 Congestion Management Program guidelines.

10. Impacts of the construction on transit operations and how these impacts can be minimized.

11. To reduce the impacts the project will have on the transportation system, the developer should look into implementing a TDM/Trip-Reduction Program with effective measures to reduce single-occupancy vehicle trips and encourage use of transit and other alternatives modes of transportation.

**Fire Protection**

The Culver City Fire department requests that the EIR to consider:

12. Traffic increases in and through Culver City and adjacent freeways – flow patterns impacting routine traffic and emergency response times and transport times.

13. Increased fire and EMS call volume due to increased people coming into and through Culver City, as well as increases in mutual aid/border response calls.

14. Impacts to area hospital emergency rooms and corresponding wait times at Los Angeles area hospitals including Southern California, Cedars, UCLA, etc.

15. Impacts from increased water demand and water availability for needed fire-flow (firefighting purposes) in the surrounding area.

16. Addition of a potential high value terrorism target in our area – target hardening considerations.

**Park and Recreation**

17. There is potentially significant impact on Culver City community resources such as Parks and Recreation facilities due to the large amount of residential units proposed and close proximity of the proposed project location to the City’s borders. There are several facilities nearby that might be affected including Syd Kroenthal Park, Culver City
Park, and Baldwin Hills Scenic Overlook. The Draft EIR shall analyze and demonstrate how a project of this size and nature will not negatively affect Culver City resources such as our Park and Recreational facilities. Based on the NOP, it is not clear if there will be a park proposed on site with recreational features (i.e. baseball fields, etc.) proposed. There does not appear to be adequate active open space areas for the population proposed.

**During Construction**

18. The traffic study and Draft EIR must identify potential impacts on traffic in City of LA as well as Culver City during construction and identify related mitigation measures.

19. Identify the project construction schedule and the length of time for demolition.

20. Indicate any staging plans or routes that trucks will take during construction. Specifically, any routes in Culver City which could potentially have significant impacts to Culver City community if not mitigated such as parking, noise, vibration, and traffic.

21. The traffic study and Draft EIR should include a construction management plan, including the haul route, the number of construction vehicles and where construction workers will park and the construction staging location. The traffic study and Draft EIR must indicate that the Project Owner shall be responsible to repair any damage to streets in Culver City caused by construction vehicles or activities.

22. **Construction Hours:** In addition to the Culver City City’s hours of construction for developments in the City, Culver City further prohibits dirt hauling and construction material delivery or removal during the morning (7:00am to 9:00am) and afternoon (4:00pm to 6:00pm). In order to minimize potential impacts to the Culver City areas, adjacent to the Project site, Culver City recommends incorporating the City's construction hours and restrictions on delivery and removal as mitigation measures in the Draft EIR and/or conditions of Project approval when it impacts the streets and areas of Culver City. Also, a point person or ombudsman should be appointed by the City to deal with construction related complaints.
April 13, 2015

Sergio Ibarra  
Department of City Planning, Environmental Analysis Section  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RE: Cumulus Transit Oriented/ Mixed-Use Project

Dear Mr. Ibarra,

Thank you for the opportunity to comment on the proposed Cumulus Transit Oriented/ Mixed-Use Project. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues that are germane to our agency’s statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

Metro bus lines operate on La Cienega Blvd. adjacent to the proposed project. Although the project is not expected to result in any long-term impacts on transit, the developer should be aware of the bus services that are present. Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines. (For closures that last more than six months, Metro’s Stops and Zones Department will also need to be notified at 213-922-5188). Other municipal bus operators may also be impacted and should be included in construction outreach efforts.

It is noted that the southern boundary of the site of the project is adjacent to Jefferson Boulevard, along which Metro Expo Line light rail trains operate on a Railroad Right-of-Way (ROW). Additionally, the proposed project is in close proximity to the La Cienega/Jefferson Station. Following concerns related to the project’s proximity to the ROW should be addressed:

1. The project sponsor is advised that the Metro Expo Line light rail currently operates weekday peak service as often as every two minutes in both directions and that trains may operate, in and out of revenue service, 24 hours a day, seven days a week, in the ROW proximate to the proposed project.

2. Considering the proximity of the proposed project to the railroad ROW, the Expo Blue Line will produce noise, vibration and visual impacts. A recorded Noise Easement Deed in favor of LACMTA is required, a form of which is attached. In addition, any noise mitigation required for the project must be borne by the developers of the project and not LACMTA. The easement recorded in the Deed will extend to successors and tenants as well.

3. The project sponsor should notify LACMTA of any changes to the construction/building plans that may impact the use of the ROW.

4. There shall be no encroachment onto the railroad ROW. If access is necessary for the applicant or its contractor to enter the ROW during construction, a temporary right-of-entry agreement must be obtained from LACMTA. Contact Velma Marshall, Deputy Executive Officer of Real Estate, at 213-922-2415 for right-of-entry permits.
5. Consistent with Zoning Information No. 1117, prior to the City issuing a building permit within 100 feet of the Metro Rail construction area, clearance shall be obtained from LACMTA. LACMTA will need to review engineering drawings and calculations. Please refer to the attached LACMTA “Design Criteria and Standards, Volume III - Adjacent Construction Design Manual” (attached) for more details regarding submitting drawings and calculations to LACMTA for review. Please note that LACMTA requires an Engineering Review Fee for evaluation of any impacts based on adjacency and relationship of the proposed building to the Metro existing structures. For more information, please contact Aspet Davidian at 213-922-5258 / DavidianA@metro.net or Than Win at 213-922-1405 / WinT@metro.net.

6. LACMTA staff shall be permitted to monitor construction activity to ascertain any impact to the ROW.

Considering the proximity to the La Cienega/Jefferson Station, LACMTA would like to identify the potential synergies associated with transit-oriented development:

1. LACMTA supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of the developments. LACMTA encourages the City and Project sponsor to be mindful of the Project's proximity to the La Cienega/Jefferson Station including orienting pedestrian pathways toward the station.

2. LACMTA would like to inform the Project Sponsor of Metro's employer transit pass programs including the Annual Transit Access Pass (A-TAP) and Business Transit Access Pass (B-TAP) programs which offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. For more information on these programs, contact Sarah Zadok, at 213-922-4110 or zadoks@metro.net.

3. LACMTA encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements for specific areas and the exploration of shared parking opportunities or parking benefit districts. These strategies could be pursued to encourage more transit-oriented development and reduce automobile-orientation in design and travel demand.

4. With an anticipated increase in traffic, LACMTA encourages an analysis of impacts on non-motorized transportation modes and consideration of improved non-motorized access to the station including pedestrian connections and bike lanes/paths. Appropriate analyses could include multi-modal LOS calculations, pedestrian audits, etc.

5. The Project should address first-last mile connections to transit, encouraging development that is transit accessible with bicycle and pedestrian-oriented street design connecting stations with housing and employment concentrations. For reference, we would like to direct City staff to view the First Last Mile Strategic Plan, authored by LACMTA and the Southern California Association of Governments (SCAG), available on line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf

Beyond impacts to Metro facilities and operations, LACMTA must also notify the applicant of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the “2010 Congestion Management Program for Los Angeles County”,

...
Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).

2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.

3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.

4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions regarding this response, please contact Nareh Nazary at 213-922-4163 or by email at DevReview@metro.net. LACMTA looks forward to reviewing the Draft EIR. Please send it to the following address:

LACMTA Development Review
One Gateway Plaza MS 99-18-3
Los Angeles, CA 90012-2952

Sincerely,

Nareh Nazary
Development Review Coordinator, Countywide Planning

Attachments:
Noise Easement Deed
Adjacent Construction Design Manual
CMP Appendix D: Guidelines for CMP Transportation Impact Analysis
RECORDING REQUESTED BY
AND WHEN RECORDED MAIL TO:

LOS ANGELES COUNTY METROPOLITAN
TRANSPORTATION AUTHORITY
Real Estate Department
Deputy Executive Officer - Real Estate
P: 213-922-2415
F: 213-922-2400
One Gateway Plaza, Mail Stop 99-18-4
Los Angeles, CA 90012-2932

________________________________________________________________________________

Space Above Line for Recorder’s Use

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Government Code Section 6103]

Public Agency - No Tax Statement

**NOISE EASEMENT DEED**

For valuable consideration, receipt of which is hereby acknowledged, (Name of Owner), a
_____________________, (“Grantor”) for themselves, their heirs, administrators, executors,
successors, assigns, tenants, and lessees do hereby grant, bargain, sell, and convey to the
LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY, a public
agency existing under the authority of the laws of the State of California (“Grantee”), its
successors and assigns, for the use and benefit of the public and its employees, a perpetual,
assignable easement in that certain real property in the City of Los Angeles, County of Los
Angeles, State of California described in Exhibit “A” attached hereto and incorporated herein by
this reference,

Said easement shall encompass and cover the entirety of the Grantors’ Property
having the same boundaries as the described Property and extending from the sub-
surface upwards to the limits of the atmosphere of the earth, the right to cause in said
easement area such noise, vibrations, fumes, dust, fuel particles, light, sonic
disturbances, and all other effects that may be caused or may have been caused by
the operation of public transit vehicles traveling along the Project right of way.

Grantor hereby waives all rights to protest, object to, make a claim or bring suit
or action of any purpose, including or not limited to, property damage or personal
injuries, against Grantee, its successors and assigns, for any necessary operating and
maintenance activities and changes related to the Project which may conflict with
Grantors’ use of Grantors’ property for residential and other purposes, and Grantors
hereby grants an easement to the Grantee for such activities.

The granting of said Easement shall also establish the Grantors’ right to further modify or
develop the Property for any permitted use. However, Grantor’s rights of development shall
not interfere with the continued operation of Grantee’s Project.
It is understood and agreed that these covenants and agreements shall be permanent, perpetual, will run with the land and that notice shall be made to and shall be binding upon all heirs, administrators, executors, successors, assigns, tenants and lessees of the Grantor. The Grantee is hereby expressly granted the right of third party enforcement of this easement.

IN WITNESS WHEREOF, the undersigned has caused its/their signature to be affixed this day of, 2013.

By: __________________________
   Name

By: __________________________
   Name

(ATTACH NOTARY SEAL AND CERTIFICATE HERE.)
ACKNOWLEDGEMENT

State of California
County of _______________________

On ________________ before me, ____________________________________

(insert name and title of the officer)

personally appeared _______________________________________________, who proved to
me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to
the within instrument and acknowledged to be that he/she/they executed the same in his/her/
their authorized capacity(ies), and that by his/her/ their signature(s) on the instrument the
person(s), or the entity upon behalf of which the person(s) acted, executed the instrument

I certify under PENALTY OF PERJURY under the laws of the State of California that the
foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature ___________________________     (Seal)

REVISED 2/09
CERTIFICATE OF ACCEPTANCE

This is to certify that the interest in the real property conveyed by the foregoing Noise Easement Deed from ________________________________ to LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY, a public agency existing under the authority of the laws of the State of California ("LACMTA"), is hereby accepted by the undersigned on behalf of the LACMTA pursuant to authority conferred by resolution of the Board of Directors of the LACMTA, and the Grantee hereby consents to the recordation of this Deed by its duly authorized officer.

Dated this _____ day of _____________, 20__

By: __________________________________________

Deputy Executive Officer - Real Estate
1.0 INTRODUCTION

1.1 Parties planning construction over, under or adjacent to a Metropolitan Transportation Authority (MTA) facility or structure are advised to submit for review seven (7) copies of their drawings and four (4) copies of their calculations showing the relationship between their project and the MTA facilities, for MTA review. The purpose of the MTA review is to reduce the chance of conflict, damage, and unnecessary remedial measures for both MTA and the parties. Parties are defined as developers, agencies, municipalities, property owners or similar organizations proposing to perform or sponsor construction work near MTA facilities.

1.2 Sufficient drawings and details shall be submitted at each level of completion such as Preliminary, In-Progress, Pre-final and Final, etc. to facilitate the review of the effects that the proposed project may or may not have on the MTA facilities. An MTA review requires internal circulation of the construction drawings to concerned departments (usually includes Construction, Operations, Maintenance, and Real Estate). Parties shall be responsible for all costs related to drawing reviews by MTA. MTA costs shall be based upon the actual hours taken for review at the hourly rate of pay plus overhead charges. Drawings normally required for review are:

A. Site Plan
B. Drainage Area Maps and Drainage Calculations
C. Architectural drawings
D. Structural drawings and calculations
E. Civil Drawings
F. Utility Drawings
G. Sections showing Foundations and MTA Structures
H. Column Load Tables
I. Pertinent Drawings and calculations detailing an impact on MTA facilities
K. Construction zone traffic safety and detour plans: Provide and regulate positive traffic guidance and definition for vehicular and pedestrian traffic adjacent to the construction site to ensure traffic safety and reduce adverse traffic circulation impact.
L. Drawings and calculations should be sent to:

MTA Third Party Administration (Permits Administration)
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, California 90012
1.3 If uncertainty exists on the possible impacts a project may have on the MTA facilities, and before submitting a formal letter requesting a review of a construction project adjacent to the Metro System, the party or his agent may contact the MTA Third Party Administrator (Permits). The Party shall review the complexity of the project, and receive an informal evaluation of the amount of detail required for the MTA review. In those cases, whereby it appears the project will present no risk to MTA, the Third Party Administrator (Permits) shall immediately route the design documents to Construction, Operations, Maintenance, and Real Estate departments for a preliminary evaluation. If it is then confirmed that MTA risk is not present, the Administrator shall process an approval letter to the party.

1.4 A period of 30 working days should be allowed for review of the drawings and calculations. Thirty (30) work days should be allowed for each successive review as required. It is noted that preliminary evaluations are usually produced within 5 working days.

1.5 The party shall reimburse the MTA for any technical review or support services costs incurred that are associated with his/her request for access to the Metro Rail System.

1.6 The following items must be completed before starting any construction:

A. Each part of the project's design may be reviewed and approved by the MTA. The prime concern of the MTA is to determine the effect of the project on the MTA structure and its transit operations. A few of the other parts of a project to be considered are overhead protection, dust protection, dewatering, and temporary use of public space for construction activities.

B. Once the Party has received written acceptance of the design of a given project then the Party must notify MTA prior to the start of construction, in accordance with the terms of acceptance.

1.7 Qualified Seismic, Structural and Geotechnical Oversight

The design documents shall note the name of the responsible Structural Engineer and Geotechnical Engineer, licensed in the State of California.

2.0 REVIEW PROCEDURE

2.1 All portions of any proposed design that will have a direct impact on an MTA facility or structure will be reviewed to assure that the MTA facility or structure is not placed in risk at any time, and that the design meets all applicable codes and criteria. Any portion of the proposed design that is to form part of an MTA controlled area shall be designed to meet the MTA Design Criteria and Standards.

2.2 Permits, where required by the local jurisdiction, shall be the responsibility of the party. City of L.A. Dept. of Bldg. and Safety and the Bureau of Engineering permit review shall remain in effect. Party shall refer to MTA Third Party Administration policies and procedures, THD5 for additional information.

2.3 Monitoring of the temporary support of excavation structures for adjacent construction shall be required in all cases for excavations within the geotechnical zone of influence of MTA structures. The extent of the monitoring will vary from case to case.

2.4 Monitoring of the inside of MTA tunnels and structures shall be required when the adjacent
excavation will unload or load the MTA structure or tunnel. Monitoring of vertical and horizontal distortions will include use of extensometers, inclinometers, settlement reference points, tilometers, groundwater observation wells, tape extensometer anchor points and load cells, as appropriately required. Acceptable limits of movement will depend on groundwater conditions, soil types and also the length of service the stations and tunnels have gone through. Escorts will be required for the survey parties entering the Metro operating system in accordance with MTA Operating Rules and Procedures. An MTA account number will be established and the costs for the escort monitoring and surveying service will be billed directly to the party or his agent as in section 1.2.

2.5 The calculations submitted for review shall include the following:

A. A concise statement of the problem and the purpose of the calculation.

B. Input data, applicable criteria, clearly stated assumptions and justifying rationale.

C. References to articles, manuals and source material shall be furnished with the calculations.

D. Reference to pertinent codes and standards.

E. Sufficient sketches or drawing references for the work to be easily understood by an independent reviewer. Diagrams indicating data (such as loads and dimensions) shall be included along with adequate sketches of all details not considered standard by MTA.

F. The source or derivation of all equations shall be shown where they are introduced into the calculations.

G. Numerical calculations shall clearly indicate type of measurement unit used.

H. Identify results and conclusions.

I. Calculations shall be neat, orderly, and legible.

2.6 When computer programs are used to perform calculations, the following information shall accompany the calculation, including the following:

A. Program Name.

B. Program Abstract.

C. Program Purpose and Applications.

D. Complete descriptions of assumptions, capabilities and limitations.

E. Instructions for preparing problem data.

F. Instructions for problem execution.

G. List (and explanation) of program acronyms and error messages.

H. Description of deficiencies or uncorrected errors.

I. Description of output options and interpretations.
J. Sample problem(s), illustrating all input and output options and hardware execution statements. Typically, these problems shall be verified problems.

K. Computer printout of all supporting calculations.

L. The "User's Manual" shall also include a certification section. The certification section shall describe the methods and how they cover the permitted options and uses of the program.

2.7 Drawings shall be drawn, to scale, showing the location and relationship of proposed adjacent construction to existing MTA structures at various stages of construction along the entire adjacent alignment. The stresses and deflections induced in the existing MTA structures should be provided.

2.8 The short-term and long-term effects of the new loading due to the adjacent construction on the MTA structures shall be provided. The soil parameters and other pertinent geotechnical criteria contained in existing contract documents for the affected structure, plus any additional conditions shall be used to analyze the existing MTA structures.

2.9 MTA structures shall be analyzed for differential pressure loadings transferred from the adjacent construction site.

3.0 MECHANICAL CRITERIA

3.1 Existing services to MTA facilities, including chilled water and condenser water piping, potable and fire water, storm and sanitary sewer, piping, are not to be used, interrupted nor disturbed without written approval of MTA.

3.2 Surface openings of ventilation shafts, emergency exits serving MTA underground facilities, and ventilation system openings of surface and elevated facilities are not to be blocked or restricted in any manner. Construction dust shall be prevented from entering MTA facilities.

3.3 Hot or foul air, fumes, smoke, steam, etc., from adjacent new or temporary facilities are not to be discharged within 40 feet of existing MTA ventilation system intake shafts, station entrances or portals. Tunnel ventilation shafts are both intake and discharge structures.

3.4 Clear access for the fire department to the MTA fire department connections shall be maintained at all times. Construction signs shall be provided to identify the location of MTA fire department connections. No interruption to fire protection water service will be permitted at any time.

3.5 Modifications to existing MTA mechanical systems and equipment, including ventilation shafts, required by new connections into the MTA System, shall only be permitted with prior review and approval by MTA. If changes are made to MTA property as built drawings shall be provided reflecting these changes.

At the option of MTA, the adjacent construction party shall be required to perform the field tests necessary to verify the adequacy of the modified system and the equipment performance. This verification shall be performed within an agreed time period jointly determined by MTA and the Party on a case by case basis. Where a modification is approved, the party shall be held responsible to maintain original operating capacity of the equipment and the system impacted by the modification.
4.0 OPERATIONAL REQUIREMENTS

4.1 GENERAL

A. Normal construction practices must be augmented to insure adequate safety for the general public entering Metro Stations and riding on Metro Trains and Buses. Design of a building, structure, or facility shall take into account the special safety considerations required for the construction of the facility next to or around an operating transit system.

B. Projects which require working over or adjacent to MTA station entrances shall develop their construction procedures and sequences of work to meet the following minimum requirements:

1. Construction operations shall be planned, scheduled and carried out in a way that will afford the Metro patrons and the general public a clean, safe and orderly access and egress to the station entrance during revenue hours.

2. Construction activities which involve swinging a crane and suspended loads over pedestrian areas, MTA station entrances and escalators, tracks or Metro bus passenger areas shall not be performed during revenue hours. Specific periods or hours shall be granted on a case-by-case basis.

3. All cranes must be stored and secured facing away from energized tracks, when appropriate.

4. All activity must be coordinated through the MTA Track Allocation process in advance of work activity.

4.2 OVERHEAD PROTECTION - Station Entrances

A. Overhead protection from falling objects shall be provided over MTA facilities whenever there is possibility, due to the nature of a construction operation, that an object could fall in or around MTA station entrances, bus stops, elevators, or areas designed for public access to MTA facilities. Erection of the overhead protection for these areas shall be done during MTA non-revenue hours.

1. The design live load for all overhead protection shall be 150 pounds per square foot minimum. The design wind load on the temporary structures shall be 20 pounds per square foot, on the windward and leeward sides of the structure.

2. The overhead protection shall be constructed of fire rated materials. Materials and equipment shall not be stored on the completed shield. The roof of the shield shall be constructed and maintained watertight.

B. Lighting in public areas and around affected MTA facilities shall be provided under the overhead protection to maintain a minimum level of twenty-five (25) footcandles at the escalator treads or at the walking surface. The temporary lighting shall be maintained by the Party.
C. Wooden construction fencing shall be installed at the boundary of the areas with public access. The fencing shall be at least eight-feet high, and shall meet all applicable code requirements.

D. An unrestricted public access path shall be provided at the upper landing of the entrance escalator-way in accordance with the following:

1. A vertical clearance between the walking surface and the lowest projection of the shield shall be 8'-0".

2. A clear pedestrian runoff area extending beyond the escalator newel shall be provided, the least dimension of which shall be twenty (20) feet.

3. A fifteen (15) foot wide strip (other than the sidewalk) shall be maintained on the side of the escalator for circulation when the escalator is pointed away from a street corner.

4. A clear path from any MTA emergency exit to the public street shall be maintained at all times.

E. Temporary sidewalks or pedestrian ways, which will be in use more than 10 days, shall be constructed of four (4") inch thick Portland cement concrete or four(4") inches of asphaltic concrete placed and finished by a machine.

4.3 OVERHEAD PROTECTION - Operating Right-of-Way Trackage

A. MTA Rail Operations Control Center shall be informed of any intent to work above, on, or under the MTA right-of-way. Crews shall be trained and special flagging operations shall be directed by MTA Rail Operations Control Center. The party shall provide competent persons to serve as Flaggers. These Flaggers shall be trained and certified by MTA Rail Operations prior to any work commencing. All costs incurred by MTA shall be paid by the party.

B. A construction project that will require work over, under or adjacent to the at grade and aerial MTA right-of-way should be aware that the operation of machinery, construction of scaffolding or any operation hazardous to the operation of the MTA facility shall require that the work be done during non-revenue hours and authorized through the MTA Track Allocation process.

C. MTA flagmen or inspectors from MTA Operations shall observe all augering, pile driving or other work that is judged to be hazardous. Costs associated with the flagman or inspector shall be borne by the Party.

D. The party shall request access rights or track rights to perform work during non-revenue hours. The request shall be made through the MTA Track Allocation process.

4.4 OTHER METRO FACILITIES

A. Access and egress from the public streets to fan shafts, vent shafts and emergency exits must be maintained at all times. The shafts shall be protected from dust and debris. See
B. Any excavation in the vicinity of MTA power lines feeding the Metro System shall be through hand excavation and only after authorization has been obtained through the MTA Track Allocation process. MTA Rail Operations Control Center shall be informed before any operations commences near the MTA power system.

C. Flammable liquids shall not to be stored over or within 25 feet horizontally of MTA underground facilities. If installed within 25 to 100 feet horizontally of the structure, protective encasement of the tanks shall be required in accordance with NFPA STD 130. Existing underground tanks located within 100 feet horizontally of MTA facilities and scheduled to be abandoned are to be disposed of in accordance with Appendix C of NFPA STD 130. NFPA STD 130 shall also be applied to the construction of new fuel tanks.

D. Isolation of MTA Facilities from Blast

Subsurface areas of new adjacent private buildings where the public has access or that cannot be guaranteed as a secure area, such as parking garages and commercial storage and warehousing, will be treated as areas of potential explosion. NFPA 130, Standard for Fixed Guideway Transit Systems, life safety separation criteria will be applied that assumes such spaces contain Class I flammable, or Class II or Class III Combustible liquids. For structural and other considerations, isolation for blast will be treated the same as seismic separation, and the more restrictive shall be applied.

E. Any proposed facility that is located within 20 feet radius of an existing Metro facility will require a blast and explosion study and recommendations to be conducted by a specialist who is specialized in the area of blast force attenuation. This study must assess the effect that an explosion in the proposed non-Metro facility will have on the adjacent Metro facility and provide recommendations to prevent any catastrophic damage to the existing Metro facility. Metro must approve the qualifications of the proposed specialist prior to commencement of any work on this specialized study.

4.5 SAFETY REGULATIONS

A. Comply with Cal/OSHA Compressed Air Safety Orders Title 8, Division 1, Chapter 4, Subchapter 3. Comply with California Code of Regulations Title 8, Title 29 Code of Federal Regulations; and/or the Construction Safety and Health Manual (Part F) of the contract whichever is most stringent in regulating the safety conditions to be maintained in the work environment as determined by the Authority. The Party recognizes that government promulgated safety regulations are minimum standards and that additional safeguards may be required

B. Comply with the requirements of Chemical Hazards Safety and Health Plan, (per 29 CFR 1910.120 entitled, (Hazardous Waste Operations and Emergency Response) with respect to the handling of hazardous or contaminated wastes and mandated specialty raining and health screening.

C. Party and contractor personnel while within the operating MTA right-of-way shall
coordinate all safety rules and procedures with MTA Rail Operations Control Center.

D. When support functions and electrical power outages are required, the approval MUST be obtained through the MTA Track Allocation procedure. Approval of the support functions and power outages must be obtained in writing prior to shutdown.

5.0 CORROSION

5.1 STRAY CURRENT PROTECTION

A. Because stray currents may be present in the area of the project, the Party shall investigate the site for stray currents and provide the means for mitigation when warranted.

B. Installers of facilities that will require a Cathodic Protection (CP) system must coordinate their CP proposals with MTA. Inquiries shall be routed to the Manager, Third Party Administration.

C. The Party is responsible for damage caused by its contractors to MTA corrosion test facilities in public right-of-way.

End of Section
Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of “Baseline Travel Data for CMP TIAs.”

D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.
D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).

D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

D.5.1 Existing Traffic Conditions. Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must
be less than one year old at the time the study is initiated, and collected in accordance with
CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA
LOS calculation requirements in greater detail. Freeway traffic volume and LOS data
provided by Caltrans is also provided in Appendix A.

D.5.2 Selection of Horizon Year and Background Traffic Growth. Horizon year(s)
selection is left to the lead agency, based on individual characteristics of the project being
analyzed. In general, the horizon year should reflect a realistic estimate of the project
completion date. For large developments phased over several years, review of intermediate
milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized
growth factors shown in Exhibit D-1. These growth factors are based on regional modeling
efforts, and estimate the general effect of cumulative development and other socioeconomic
changes on traffic throughout the region. Beyond this minimum, selection among the
various methodologies available to estimate horizon year background traffic in greater
detail is left to the lead agency. Suggested approaches include consultation with the
jurisdiction in which the intersection under study is located, in order to obtain more
detailed traffic estimates based on ongoing development in the vicinity.

D.6 PROPOSED PROJECT TRAFFIC GENERATION

Traffic generation estimates must conform to the procedures of the current edition of Trip
Generation, by the Institute of Transportation Engineers (ITE). If an alternative
methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if
the existing use was operating during the year the traffic counts were collected. Current
traffic generation should be substantiated by actual driveway counts; however, if infeasible,
traffic may be estimated based on a methodology consistent with that used for the proposed
use.

Regional transportation impact analysis also requires consideration of trip lengths. Total
site traffic generation must therefore be divided into work and non-work-related trip
purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors
which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that
any traffic counts on CMP facilities needed to prepare the TIA should be done in the
manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within
one year of the deadline for submittal of CMP highway monitoring data, the local
jurisdiction would save the cost of having to conduct the traffic counts twice.

D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are
provided in Exhibit D-3, based on regional modeling efforts. These factors indicate
Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.
(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

D.8.1 Intersection Level of Service Analysis. The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

D.8.2 Arterial Segment Analysis. For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.
D.8.3 Freeway Segment (Mainline) Analysis. For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

D.8.4 Transit Impact Review. CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- Evidence that affected transit operators received the Notice of Preparation.
- A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both “peak hour” and “daily” refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
  - Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
  - For each time period, multiply the result by one of the following factors:
    - 3.5% of Total Person Trips Generated for most cases, except:
      - 10% primarily Residential within 1/4 mile of a CMP transit center
      - 15% primarily Commercial within 1/4 mile of a CMP transit center
      - 7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
      - 9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
      - 5% primarily Residential within 1/4 mile of a CMP transit corridor
      - 7% primarily Commercial within 1/4 mile of a CMP transit corridor
      - 0% if no fixed route transit services operate within one mile of the project

To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, Guidelines for New Development Activity Tracking and Self Certification. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction’s TDM Ordinance measures, but other project specific measures.
D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

D.9.1 Criteria for Determining a Significant Impact. For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$). The lead agency may apply a more stringent criteria if desired.

D.9.2 Identification of Mitigation. Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.

- Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

D.9.3 Project Contribution to Planned Regional Improvements. If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- Any project contribution to the improvement, and
- The means by which trips generated at the site will access the regional facility.

D.9.4 Transportation Demand Management (TDM). If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.
D.10 REFERENCES


3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.


Notice of Preparation of a CEQA Document for the Cumulus Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff’s comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft CEQA document. Please send the SCAQMD a copy of the CEQA document upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis
The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD’s Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD’s website here: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). SCAQMD staff also recommends that the lead agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: [http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2). In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST’s can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is
recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board’s Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: http://www.arb.ca.gov/ch/handbook.pdf. CARB’s Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

**Mitigation Measures**

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:

- Chapter 11 of the SCAQMD CEQA Air Quality Handbook
- SCAQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD’s Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf?sfvrsn=4.

**Data Sources**

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD’s Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD’s webpage (http://www.aqmd.gov).

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at jwong1@aqmd.gov or call me at (909) 396-3176.

Sincerely,

Jillian Wong
Jillian Wong, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

LAC150313-02
Control Number
April 13, 2015

Mr. Sergio Ibarra, City Planning Associate
City of Los Angeles
Development of City Planning, Environmental Analysis Section
200 North Spring Street, Room 750
Los Angeles, California 90012
Email: Sergio.ibarra@acity.org

RE: SCAG Comment on the Notice of Preparation of a Draft Environmental Impact Report for the Cumulus Transit Oriented/Mixed-Use Project [SCAG NO. IGR8403]

Dear Mr. Ibarra,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Cumulus Transit Oriented/Mixed-Use Project ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including its Sustainable Communities Strategy (SCS) component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Cumulus Transit Oriented/Mixed-Use Project in Los Angeles County. The proposed project consists of approximately 1,218 multi-family residential units and up to 300,000 square feet of commercial use on an 11.19 acre lot.

When available, please send environmental documentation to SCAG’s office in Los Angeles or by email to sunl@scag.ca.gov providing, at a minimum, the full public comment period for review. If you have any questions regarding the attached comments, please contact Lijin Sun, Esq., Senior Regional Planner, at (213) 236-1882 or sunl@scag.ca.gov. Thank you.

Sincerely,

Ping Chang
Program Manager II, Land Use and Environmental Planning

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1 SB 375 amends CEQA to add Chapter 4.2 Implementation of the Sustainable Communities Strategy, which allows for certain CEQA streamlining for projects consistent with the RTP/SCS. Lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining “consistency” of any future project with the SCS. Any “consistency” finding by SCAG pursuant to the IGR process should not be construed as a finding of consistency under SB 375 for purposes of CEQA streamlining.
COMMENTS ON THE NOTICE OF PREPARATION OF
A DRAFT ENVIRONMENTAL IMPACT REPORT FOR
THE CUMULUS TRANSIT ORIENTED/MIXED-USE PROJECT [SCAG NO. IGR8403]

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS.

2012 RTP/SCS Goals

The SCAG Regional Council adopted the 2012 RTP/SCS in April 2012. The 2012 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations (see http://rtpscs.scag.ca.gov). The goals included in the 2012 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2012 RTP/SCS are the following:

<table>
<thead>
<tr>
<th>SCAG 2012 RTP/SCS GOALS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>RTP/SCS G1:</strong> Align the plan investments and policies with improving regional economic development and competitiveness</td>
</tr>
<tr>
<td><strong>RTP/SCS G2:</strong> Maximize mobility and accessibility for all people and goods in the region</td>
</tr>
<tr>
<td><strong>RTP/SCS G3:</strong> Ensure travel safety and reliability for all people and goods in the region</td>
</tr>
<tr>
<td><strong>RTP/SCS G4:</strong> Preserve and ensure a sustainable regional transportation system</td>
</tr>
<tr>
<td><strong>RTP/SCS G5:</strong> Maximize the productivity of our transportation system</td>
</tr>
<tr>
<td><strong>RTP/SCS G6:</strong> Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)</td>
</tr>
<tr>
<td><strong>RTP/SCS G7:</strong> Actively encourage and create incentives for energy efficiency, where possible</td>
</tr>
<tr>
<td><strong>RTP/SCS G8:</strong> Encourage land use and growth patterns that facilitate transit and non-motorized transportation</td>
</tr>
<tr>
<td><strong>RTP/SCS G9:</strong> Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies</td>
</tr>
</tbody>
</table>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the policy and supportive analysis in a table format. Suggested format is as follows:
SCAG 2012 RTP/SCS GOALS

<table>
<thead>
<tr>
<th>Goal</th>
<th>Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>RTP/SCS G1: Align the plan investments and policies with improving regional economic development and competitiveness</td>
<td>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</td>
</tr>
<tr>
<td>RTP/SCS G2: Maximize mobility and accessibility for all people and goods in the region</td>
<td>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</td>
</tr>
</tbody>
</table>

RTP/SCS Strategies

To achieve the goals of the 2012 RTP/SCS, a wide range of strategies are included in SCS Chapter (starting on page 152) of the RTP/SCS focusing on four key areas: 1) Land Use Actions and Strategies; 2) Transportation Network Actions and Strategies; 3) Transportation Demand Management (TDM) Actions and Strategies and; 4) Transportation System Management (TSM) Actions and Strategies. If applicable to the proposed project, please refer to these strategies as guidance for considering the proposed project within the context of regional goals and policies. To access a listing of the strategies, please visit http://rtpscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf (Tables 4.3 - 4.7, beginning on page 152).

Regional Growth Forecasts

At the time of this letter, the most recently adopted SCAG forecasts consists of the 2020 and 2035 RTP/SCS population, household and employment forecasts. To view them, please visit http://scag.ca.gov/Documents/2012/AdoptedGrowthForecastPDF.pdf. The forecasts for the region and applicable jurisdictions are below.

<table>
<thead>
<tr>
<th>Adopted SCAG Region Wide Forecasts</th>
<th>Adopted City of Los Angeles Forecasts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Year 2020</td>
<td>Year 2035</td>
</tr>
<tr>
<td>Population</td>
<td>19,663,000</td>
</tr>
<tr>
<td>Households</td>
<td>6,458,000</td>
</tr>
<tr>
<td>Employment</td>
<td>8,414,000</td>
</tr>
</tbody>
</table>

MITIGATION

SCAG staff recommends that you review the SCAG 2012 RTP/SCS Final Program EIR Mitigation Measures for guidance, as appropriate. See Chapter 6 (beginning on page 143) at: http://rtpscs.scag.ca.gov/Documents/peir/2012/final/Final2012PEIR.pdf

As referenced in Chapter 6, a comprehensive list of example mitigation measures that may be considered as appropriate is included in Appendix G: Examples of Measures that Could Reduce Impacts from Planning, Development and Transportation Projects. Appendix G can be accessed at: http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012FPEIR_AppendixG_ExampleMeasures.pdf
Notice of Preparation

March 12, 2015

To: Reviewing Agencies

Re: Cumulus Transit Oriented/Mixed-Use Project
SCH# 2015031047

Attached for your review and comment is the Notice of Preparation (NOP) for the Cumulus Transit Oriented/Mixed-Use Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Sergio Ibarra  
City of Los Angeles  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Attachments: 
cc: Lead Agency.
**SCH#** 2015031047  
**Project Title** Cumulus Transit Oriented/Mixed-Use Project  
**Lead Agency** Los Angeles, City of

**Type** NOP  Notice of Preparation  
**Description** The proposed Project consists of the demolition of an existing office building, accessory structures and four light industrial structures (approximately 63,313 sf), two existing radio tower structures, and the development of an approximately 1,900,000-sf transit-oriented, mixed-use development, consisting of podium style buildings, that vary in number of stories and height up to approximately 300 feet. The Applicant may seek flexible land use entitlements (based on equivalent environmental impacts) with a base plan of approximately 1,218 multi-family residential units (up to 1,600,000 sf of residential floor area) and up to 300,000 sf of commercial floor area on the lower ground floors, and a total FAR of 3.9:1.

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**Lead Agency Contact**

<table>
<thead>
<tr>
<th><strong>Name</strong></th>
<th>Sergio Ibarra</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Agency</strong></td>
<td>City of Los Angeles</td>
</tr>
<tr>
<td><strong>Phone</strong></td>
<td>(213) 978-1332</td>
</tr>
<tr>
<td><strong>Fax</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Address</strong></td>
<td>200 N. Spring Street, Room 750</td>
</tr>
<tr>
<td><strong>City</strong></td>
<td>Los Angeles</td>
</tr>
<tr>
<td><strong>State</strong></td>
<td>CA</td>
</tr>
<tr>
<td><strong>Zip</strong></td>
<td>90012</td>
</tr>
</tbody>
</table>

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**Project Location**

<table>
<thead>
<tr>
<th><strong>County</strong></th>
<th>Los Angeles</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>City</strong></td>
<td>Los Angeles, City of</td>
</tr>
</tbody>
</table>

**Cross Streets**

**Lat / Long**

**Parcel No.**

**Township**

<table>
<thead>
<tr>
<th><strong>Range</strong></th>
<th><strong>Section</strong></th>
<th><strong>Base</strong></th>
</tr>
</thead>
</table>

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**Proximity to:**

- Highways
- Airports
- Railways
- Waterways
- Schools
- Land Use

---

**Project Issues**

**Reviewing Agencies** Resources Agency; Department of Parks and Recreation; Resources, Recycling and Recovery; Department of Water Resources; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; Public Utilities Commission; California Highway Patrol; Caltrans, District 7; Air Resources Board; Regional Water Quality Control Board, Region 4; Other Agency(ies)

---

**Date Received** 03/12/2015  
**Start of Review** 03/12/2015  
**End of Review** 04/10/2015

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Note: Blanks in data fields result from insufficient information provided by lead agency.
NOP Distribution List

County: Los Angeles

Caltrans, District 8
Mark Roberts

Caltrans, District 9
Gayle Rosander

Caltrans, District 10
Tom Dumas

Caltrans, District 11
Jacob Armstrong

Caltrans, District 12
Maureen El Harake

Cal EPA
Air Resources Board
All Other Projects
Cathie Slaminski

Transportation Projects
Nesamani Kalandiyur

Industrial/Energy Projects
Mike Toletich

State Water Resources Control Board
Regional Programs Unit
Division of Financial Assistance

State Water Resources Control Board
Jeffrey Werth
Division of Drinking Water

State Water Resources Control Board
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality

State Water Resources Control Board
Phil Crader
Division of Water Rights

Dept. of Toxic Substances Control
CEQA Tracking Center

Department of Pesticide Regulation
CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

RWQCB 1
Cathleen Hudson
North Coast Region (1)

RWQCB 2
Environmental Document Coordinator
San Francisco Bay Region (2)

RWQCB 3
Central Coast Region (3)

RWQCB 4
Teresa Rodgers
Los Angeles Region (4)

RWQCB 55
Central Valley Region (5)

RWQCB 5F
Central Valley Region (5)
Fresno Branch Office

RWQCB 5R
Central Valley Region (5)
Redding Branch Office

RWQCB 6
Lahontan Region (6)

RWQCB 6V
Lahontan Region (6)
Victorville Branch Office

RWQCB 7
Colorado River Basin Region (7)

RWQCB 8
Santa Ana Region (8)

RWQCB 9
San Diego Region (9)

Other

Last Updated 10/13/2014
Hi, Sergio.

We spoke at the Public Scoping Meeting held this past Wednesday, March 25, 2015 @ the New Life Christian Center regarding the project listed in the subject above. It was great finally connecting the dots to where we met before!

Just to follow up on my concerns related to this project. Please make sure that the public feedback relays the concern of this project overrunning the community. I am concerned of the residential life and integrity of our neighborhood surrounding Westside Neighborhood Park which encompasses the cul-de-sacs surrounding Boden and Clyde – will be the most impacted by traffic around Jefferson Boulevard and La Cienega. I am on Genesee Avenue. The first cul-de-sac East of La Cienega and north of Jefferson. My cul-de-sac is the first one upon entering from Boden.

Please make sure that the Traffic Mitigation addresses:

- La Cienega @ Boden. The Starbucks, La Cienega @ Jefferson is a nightmare. There is limited ingress and egress out of the Starbucks location PLUS there is a bus stop right in front of that store. One takes their life in their own hands coming out of our cul-de-sac, onto Boden and to try and make a right turn on La Cienega – forget about a left turn – that is very dangerous. One encounters MAJOR traffic going North and South on La Cienega, people make illegal U-turns right in front of the Cumulus station, plus take into account the employees coming out of their radio station add to the congestion, chaos and accidents around this area.

- Jefferson @ Clyde. Cars driving East and West constantly block the area. Lack of traffic light for cars trying to exit out of our neighborhood to avoid La Cienega are also constantly taking their life in their own hands. I have witnessed senior citizens trying to cross this major boulevard and it's frightening. Cars trying to avoid congestion @ Jefferson and La Cienega Blvd., will zip through Clyde and take Boden to get to La Cienega. Again, major neighborhood intrusion.

I look forward to solutions that can solve the issues raised above.

Thank you,
Alita
We are concerned the Air Space is subdivided without any report or study on the migratory patterns of birds in the area. We question if drones may play into the arena of air space and if this is covered by a restriction. There may be value in Air Space or Air Rights, if sold. All areas have hydrology, yet this report diminishes that fact.

Aesthetics may also be affected.

Glare, reflection, and ozone should be studied.

The increased density should be analyzed against the current state of the infrastructure and the utility reliability. State of California has declared a drought with conservation measures in place. The financial burden or economic analysis should be presented.

Density may also increase the need for Fire Services. There should be an analysis or Police, Fire and Ambulance response times.

Ballona Wetlands is under the National Estuary Program, yet you only recognize Ballona Creek and not the other aspects of the watershed.

This project flows into the BALLONA CREEK WATERSHED and has requirements for TMDL reductions in the MS4 permit. None of those aspects including any Watershed Management Plans or Enhanced Watershed Management Plans have been mentioned.

Ongoing water quality monitoring is required but not addressed in this document.

Oxford Lagoon has not been addressed, yet is the site of the Monarch Butterfly and an osprey. This project may affect these two species. Monarch Butterflies are under consideration as an endangered species. This is also in the BALLONA CREEK WATERSHED.

Fault Studies and Liquefaction analysis should be presented.

Any possible de-watering issues should be addressed at this stage.

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031
Theresa Duperon  
3011 S. Genesee Ave.  
Los Angeles, CA 90016  

March 25, 2015  

Sergio Ibarra  
Department of City Planning  
200 N. Spring St., Rm. 750  
Los Angeles, CA 90012  

Dear Mr. Ibarra,

I have lived in this neighborhood for 57 yrs. I have seen all the changes and lived through all the earthquakes. The investors for the proposed 3351 LaCienega Blvd., 90016, did not help our property values rise. But now that our property values have risen, they will bring those values back down with 1200 new apartments.

1. There is barely enough room in our neighborhood for 100 new apartments.
2. Traffic at and around the intersection of LaCienega Bl. and Jefferson Bl. and on LaCienega Bl., from Venice Bl. to Rodeo Rd., is packed from 7:30am to 10:00 am and from 10:30am to 8:00pm. We cannot support more traffic from 1200 new apartments.
3. We are in drought for years now. 1200 units will SEVERLY deplete our water supply.
4. If there is an emergency, like earthquakes we have had in this area for the last 50 years, we will all be trapped in this neighborhood, and with no water.
5. The structures should be no taller than 3 stories. Taller than 3 story buildings will block out our sunlight and combined with the increase in traffic, SEVERLY deplete our air supply.
6. We need trees to line the west side of LaCienega Bl. from Blackwelder St. to Jefferson Bl.
7. The proposed market and strip mall will add a small amount of low paying jobs.
8. We on Genesee Ave., Boden St. and Spokane St. need permanent PERMIT PARKING NOW.

This project is detrimental to all of us in the surrounding neighborhood and should not be built.

Sincerely,

Theresa Duperon
Dear Mr. Ibarra,

Please attach this letter with my 1st one to you dated March 25, 2015 so I will not bore you with reiteration. I attended your meeting/promotion/viewing/gathering at 2600 S. LaBrea on March 25, 2015.

My 92 year old mother lives with me at our Genesee Ave. home and she was the original owner. She still gets out with a wheelchair and isn’t dying anytime soon. She has a handicap parking placard 431235D and because parking is already horrendous on our street, she desperately needs a permanent handicap parking designation and sign in front of our house, attached to the city street light there.

We, on the designated, affected streets of Boden, Genesee and Spokane need drought resistant trees planted up and down all of our blocks, adjacent to our sidewalks, lining our streets; and in addition to, permanent permit residents only parking for us (and the few, short blocks going east all the way to Clyde, if the residents want it).

We need Clyde to remain open, with ingress and egress, at intersection of Clyde and Jefferson and we desperately need a traffic signal there. Take that Bus signal down, between Clyde and LaCienega. Vehicles never turn there.

At intersection of LaCienega and Boden, Boden will have to be closed with a huge concrete planter. At both intersections of Spokane and Clyde and Boden and Clyde we need street signs to read NO OUTLET. Traffic using Clyde to cut through from Jefferson will be forced to take Clyde all the way to Adams. They won’t do that very much.

Someone mentioned a guard shack at the corner of LaCienega and Boden, at the March 25 gathering. That is not a good idea because residents east of Clyde are sure to vandalize it out of resentment and just for kicks.

The following page duplicates what I wrote you in my first letter. It is included for your convenience.
I have lived in this neighborhood for 57 yrs. I have seen all the changes and lived through all the earthquakes. The investors for the proposed 3351 LaCienega Blvd., 90016, did not help our property values rise. But now that our property values have risen, they will bring those values back down with 1200 new apartments.

1. There is barely enough room in our neighborhood for 100 new apartments.
2. Traffic at and around the intersection of LaCienega Bl. and Jefferson Bl. and on LaCienega Bl., from Venice Bl. to Rodeo Rd., is packed from 7:30am to 10:00 am and from 10:30am to 8:00pm. We cannot support more traffic from 1200 new apartments.
3. We are in drought for years now. 1200 units will SEVERLY deplete our water supply.
4. If there is an emergency, like earthquakes we have had in this area for the last 50 years, we will all be trapped in this neighborhood, and with no water.
5. The structures should be no taller than 3 stories. Taller than 3 story buildings will block out our sunlight and combined with the increase in traffic, SEVERLY deplete our air supply.
6. We need trees to line the west side of LaCienega Bl. from Blackwelder St. to Jefferson Bl.
7. The proposed market and strip mall will add a small amount of low paying jobs.
8. We on Genesee Ave., Boden St. and Spokane St. need permanent PERMIT PARKING NOW.

This project is detrimental to all of us in the surrounding neighborhood and should not be built.

Sincerely,

Theresa Duperon
April 13, 2015

By Email—Sergio.Ibarra@lacity.org
SENT VIA MESSENGER
Mr. Sergio Ibarra
City of Los Angeles
Department of City Planning, Environmental
Analysis Section
200 N. Spring Street, Room 750
Los Angeles, CA  90012

Re:  Public Comment – Schultz Enterprises, Inc.; 3249 S. La Cienega, Los Angeles, CA 90016 (APN 4205-035-001)

Case No.: ENV-2014-4755-EIR
Project Name: Cumulus Transit Oriented/Mixed-Use Project
Project Location/Address: 3321, 3351 S. La Cienega Boulevard; 5717, 5727, 5733, 5735 W. Jefferson Boulevard., Los Angeles, CA 90016
Community Planning Area: West Adams – Baldwin Hills – Leimert
Council District: 10, Herb Wesson
Due Date for Public Comments: April 13, 2015.

Dear Mr. Ibarra:

This public comment is submitted on behalf of Schultz Enterprises, Inc. ("Schultz"). Schultz owns the property located at 3249 S. La Cienega, Los Angeles, CA 90016 (APN 4205-035-001). This property is adjacent to the project described above, at its northwest corner.

The proposed project is a huge development that will greatly impact my client’s property and vastly change the entire neighborhood.
As described in the "Notice of Preparation of an Environmental Report and Public Scoping Meeting," for the project dated March 12, 2015:

**PROJECT DESCRIPTION:** The proposed Project consists of the demolition of an existing office building, accessory structures and four light industrial structures (approximately 63,313 square feet), two existing radio tower structures, and the development of an approximately 1,900,000-square foot transit-oriented, mixed-use development, consisting of podium style buildings, that vary in number of stories and height up to approximately 300 feet.

The project will replace 63,313 square feet of existing short structures with a huge 1,900,000 square foot development that will be 300 feet tall and will loom over the surrounding area, including my client's property. This is a tremendous change to the entire area that cannot help but impact the area as a whole and my client's property. Specifically, my client has the following particular comments:

1. **Traffic Flow and Congestion.** Generally, the area is already heavily congested with traffic and the environmental impact report needs to address the cumulative impact of this new project on an already heavily congested area, as the law requires. The current flow of traffic is at times quite heavy and slow moving, particularly in the afternoon to early evening time. The rush hour traffic greatly impedes the ingress and egress to my client's property at 3249 S. La Cienega, both to La Cienega Boulevard and Jefferson Boulevard. The "cut through" traffic originating on Jefferson at Holdredge and Rodeo Road at Lenawee Avenue, impacts a residential neighborhood known as Blair Hills with counts on Lenawee at Ivy of nearly 2000 in several hours on a daily basis. My client's other property at 3814 Lenawee Ave. is also squarely in the impact zone.

2. **La Cienega Boulevard Access.** The access for my client's property is via a private street #733. This private street is the North boundary for the proposed project and not a part of the project. Vehicles exiting this private street onto La Cienega Boulevard face challenges in joining northbound La Cienega Boulevard traffic. In considering the project some mitigation to alleviate this concern is necessary.

3. **Private Street # 733 Access.** Furthermore, the south side of the private street #733 is a designated fire lane, but the signs have been removed and partial blockage of the street occurs daily. Any further pressure on parking on this private street #733 is of concern and would involve danger to the safety of every one in the area in the event of a fire.
The private street #733 appears to be the available emergency access for the proposed high rise buildings of the project and needs to be part of the emergency planning for the project.

4. **La Cienega Place Access.** The alternate access to my client's property is via La Cienega Place south to Jefferson. Entering Jefferson from La Cienega Place at rush hour requires an indeterminate, lengthy time and delay while waiting for a break in traffic. East bound access onto Jefferson is nearly impossible. An exit westbound is easier but will result in a "cut through" turn at Jefferson and Holdredge if Southbound La Cienega is a traveler's goal.

5. **Construction.** The project also impacts my client's tenants with noise, vibration and dust during the construction phase. The film production and editing operations of these tenants cannot be burdened with limitless disturbances. Appropriate mitigation measures, specific to these tenants, are absolutely necessary. Furthermore, the time line for construction needs to be studied, adjusted and mitigated so that construction activities are scheduled in such a way that these impacts are mitigated.

6. **Wind Pattern.** As has happened in other cases of taller buildings, the wind flow pattern will change with unknown result to my client's property. The project may obstruct airflow causing stagnant air and odors due to the close proximity to Ballona Creek, traffic exhaust, sewer spills and manufacturing pollution. Wind flow, odor potential off Ballona Creek, and other unspecified consequences of the tall buildings needs to be considered and must be addressed and mitigated.

7. **Solar Energy and Other Energy Change.** As discussed above, the project when constructed will loom over the surrounding buildings and block sunlight during substantial portions of the day. My client will receive less sunlight for solar energy purposes. The project will obstruct sunlight causing the area to remain dark some of the day. This impacts the desirability of my client's building and also filming by my client's movie studio tenants. The impact on solar energy and the impact on energy needs to be addressed and mitigated.

8. **Sewer Line.** A sewer main runs East to West on my client's southern property line. The impact of the project on this sewer line, and sewage generally in the area, needs to be addressed and must be mitigated. Will the additional loads from the project result in greater danger of sewer line failure or overburdening the sewage system?

9. **The Need For Increased Security.** The increased and high density of population will create more opportunity for mischief and crime, resulting in more expense
for local property owners and tenants. My client will incur additional cost for perpetual increased security during construction and after, due to over 1200 residential units as well as shopping in close proximity. This danger and cost needs to be addressed and must be mitigated if possible.

10. **Privacy Of Occupants Is Diminished.** The additional population and the tall buildings will negatively affect my client's tenants with loss of privacy due to the towering structures with clear view of the activities below. The tenants are mainly film industry executives who require privacy for their business.

11. **Loss of Income and Property Value.** My client has owned this property for many years and it is the primary source of income for my client and the Schultz family which owns it. Furthermore, the value of the property is a major family asset. The subject project is a colossal change. The combined result of all the impacts discussed above may result in a lower property value for my client's property and the other properties in the area. Tenants may be less willing to stay, renew, or commit to long term leases. My client's building may lose some of its appeal to its movie studio tenants. There could be tenant demand for reduced rents rate or for other monetary concessions. There could be increased tenant turnover and extended vacancy. These possible impacts and losses need to be addressed and must be mitigated.

12. **Future Unpredicted Impacts.** Furthermore, it is beyond my client's capabilities to predict what all the changes might be. But it should not be my client's burden to do so. The unpredictable impacts of this gigantic project should be anticipated and project conditions should be imposed requiring future mitigation if unanticipated impacts arise. Furthermore, if the operating experience demonstrates loss of income or property value for my client as a result of this project, that impact should be addressed and mitigated at the time of the EIR, and as a condition requiring future mitigation after the project is up and operating.

Regards,

JOSEPH S. DZIDA
CALLANAN, ROGERS & DZIDA, LLP

JSD/JSD
I have personal knowledge of the facts set forth above and adopt Mr. Dzida's statements as my own. His letter expresses my concerns and comments and the concerns and comments of my family owned company Schultz Enterprises, Inc.

Robert Schultz, president of Schultz Enterprises, Inc.

Dated: 4-13, 2015
Cumulus Transit Oriented/Mixed-Use Project

3 messages

Ewell Ewell <edphoto34@sbcglobal.net> Thu, Mar 26, 2015 at 11:58 AM
To: Sergio.Ibarra@lacity.org

Dear Mr. Ibarra, I reside off of La Cienega and Bowesfield St. (5780) I received information about your meeting on March 12, 2015 to late to attend. Question: Why were homeowners from this area (Bowesfield St, not informed of this meeting? We are represented by The Baldwin Hills Village Gardens Homeowners Association. Thank You for any future information
Edward Ewell

Sergio Ibarra <sergio.ibarra@lacity.org> Thu, Mar 26, 2015 at 2:56 PM
To: Ewell Ewell <edphoto34@sbcglobal.net>

Hello Mr. Ewell,
If you would like to be part of future mailings, please provide me with your name and address so that you will receive notice of the Draft EIR and so forth (when the proposal reaches that stage). This is the initial stage of the environmental review process (The scoping meeting and notice of Preparation), and owners and occupants within a 500 foot radius were mailed noticed, along with neighborhood councils and other organizations in the area. Feel free to provide me with you or your organization's mailing info for future notification! Also please note that the Initial Study is available at the City Planning Departments website, under the Environmental tab, NOP. Feel free to call me if you have further questions. Thank you,
Sergio

On Thu, Mar 26, 2015 at 11:58 AM, Ewell Ewell <edphoto34@sbcglobal.net> wrote:

Dear Mr. Ibarra, I reside off of La Cienega and Bowesfield St. (5780) I received information about your meeting on March 12, 20015 to late to attend. Question: Why were homeowners from this area (Bowesfield St, not informed of this meeting? We are represented by The Baldwin Hills Village Gardens Homeowners Association. Thank You for any future information
Edward Ewell

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Sergio Ibarra
Major Projects
200 N. Spring St. Suite 750
Los Angeles, CA 90012
213-978-1333
Sergio.Ibarra@lacity.org

Ewell Ewell <edphoto34@sbcglobal.net> Fri, Apr 10, 2015 at 5:08 PM
Reply-To: Ewell Ewell <edphoto34@sbcglobal.net>
To: Sergio Ibarra <sergio.ibarra@lacity.org>

Edward Ewell, 5780 Bowesfield St. L.A. Ca. 90016. Thank You for any future information pertaining to this project. Mr. Ibarra the huge problem is the traffic in this area. Presently their is congestion nonstop. (attachments). With the already new apartments etc. in Playa Vista (Culver City) and the newer planned complexes in that area I cant amagen how difficult travel will be. I am sure the planning commission is aware of all these facts. There is only one Jefferson Bl., Sepulveda Bl. and La Cienega (Highway) and they are already
chocked to death. Thank You,

Edward Ewell

[Quoted text hidden]

3 attachments

P4070304.JPG
2121K

P4070308.JPG
2072K

P4070310.JPG
2960K
Jefferson and La Cienega Project - EIR

1 message

Mark Walker <jaynaghib@yahoo.com>  Tue, Apr 14, 2015 at 1:21 PM
To: Sergio.Ibarra@lacity.org
Cc: jaynaghib@yahoo.com

Project: Jefferson and La Cienega
Name: Mark Walker
Address: 4908 Orinda Ave, Los Angeles, CA 90043
Phone Number: 323-304-3390
Email: jaynaghib@yahoo.com

I would like to see in the Environment Impact Report the following

1) A detail study of traffic patterns along Jefferson Blvd, La Cienega Blvd, and Fairfax Blvd.
2) What plans will be proposed to mitigate traffic congestion
3) Insure that the developer provides adequate parking for residents and customers

Please incorporate my comments in the Environment Impact Report.

Thank for your consideration

Mark Walker
This is your opportunity to provide feedback and comments to the City of Los Angeles on the proposed project and the scope and content of the Environmental Impact Report.

Please print legibly:

NAME: Susan Yun

ORGANIZATION (if any): City of Culver City

ADDRESS: 9700 Culver Bl

PHONE NUMBER: 310 253-5755

EMAIL ADDRESS: susan.yun@culvercity.org

WHAT WOULD YOU LIKE TO SEE STUDIED IN THE ENVIRONMENTAL IMPACT REPORT?

COMMENTS: Immediately

As an adjacent city, Culver City requests that the EIR provides more mitigation measures for potentially significant impacts to Culver City residents and businesses in regards to:

1) Traffic impact in CC as a result of this project
2) Police and Fire (response)
3) Parks/Recreation
4) Construction
5) Other (TBD)

Please contact me if you need any Culver City information to conduct any analysis that would be relevant for the EIR as it relates to Culver City.

Please use another sheet if you need more space for your comments.

To submit completed comment sheets, please return to staff member, place in the comment box or mail by April 13, 2015 to:
Sergio Ibarra
Department of City Planning, Environmental Analysis Section
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Responses may also be emailed to:
Sergio.Ibarra@lacity.org
This is your opportunity to provide feedback and comments to the City of Los Angeles on the proposed project and the scope and content of the Environmental Impact Report.

Please print legibly:

NAME: Richard Washington

ORGANIZATION (IF ANY): Retired

ADDRESS: 4238 Coghill Drive, LA 90008

PHONE NUMBER: 323-605-6526

EMAIL ADDRESS: rhusc4u@cs.com

WHAT WOULD YOU LIKE TO SEE STUDIED IN THE ENVIRONMENTAL IMPACT REPORT?

COMMENTS: Traffic impact, proposed mitigation measures, proposed community benefits, local school impact

Please use another sheet if you need more space for your comments.

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Sergio Ibarra
Department of City Planning, Environmental Analysis Section
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Responses may also be emailed to:
Sergio.Ibarra@acity.org
This is your opportunity to provide feedback and comments to the City of Los Angeles on the proposed project and the scope and content of the Environmental Impact Report.

Please print legibly:

NAME: Lula Hines

ORGANIZATION (IF ANY):

ADDRESS: 5657 Spokane ST, LA, 90016

PHONE NUMBER: (323) 934-3743

EMAIL ADDRESS:

WHAT WOULD YOU LIKE TO SEE STUDIED IN THE ENVIRONMENTAL IMPACT REPORT?

COMMENTS:

Better traffic flow. We're having problems getting on to Jefferson & La Cienega. Traffic is coming through our neighborhood from La Cienega & Jefferson at very high speed.

More traffic to our street in neighborhood, more smog.

Please use another sheet if you need more space for your comments.

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Department of City Planning, Environmental Analysis Section
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Responses may also be emailed to:
Sergio.Ibarra@acity.org
This is your opportunity to provide feedback and comments to the City of Los Angeles on the proposed project and the scope and content of the Environmental Impact Report.

Please print legibly:

NAME:  
SUSAN DI GIULIO

ORGANIZATION (IF ANY):  
ZINNIA CONSULTANTS + VILLAGE GREEN

ADDRESS:  
5323 VILLAGE GROVE LA 90016

PHONE NUMBER:  
310-770-4287

EMAIL ADDRESS:  
smdiguiulo@smacd.com

WHAT WOULD YOU LIKE TO SEE STUDIED IN THE ENVIRONMENTAL IMPACT REPORT?

COMMENTS:  
ADDITION OF BIKE LANE FROM RODEO TO VENICE; NOT USING LA CIENEGA OR LA BUDA (ie, TRAFFIC CLOSING)

Retail Suggestions: Petco's, Cafe 42 or Sim (not CBLT or SWEETBROOK)

TJ'S

LITTLE FOODS

Please use another sheet if you need more space for your comments.

To submit completed comment sheets, please return to staff member, place in the comment box or mail by April 13, 2015 to:

Sergio Ibarra
Department of City Planning, Environmental Analysis Section
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Responses may also be emailed to:
Sergio.ibarra@lacity.org
This is your opportunity to provide feedback and comments to the City of Los Angeles on the proposed project and the scope and content of the Environmental Impact Report.

Please print legibly:

NAME: Alita Bernal

ORGANIZATION (OF ANY): 

ADDRESS: 29116 S. Genesee Ave. LA CA 90016

PHONE NUMBER: 213.280.0445

EMAIL ADDRESS: alitabe9@gmail.com

WHAT WOULD YOU LIKE TO SEE STUDIED IN THE ENVIRONMENTAL IMPACT REPORT?

COMMENTS:

I would like to see a traffic mitigation report. I am very concerned about the neighborhood intrusion with the traffic. Cars are constantly making illegal U-turns on La Cienega Blvd @ Boden. Cars race through our neighborhood via Boden when they come through via Jefferson & Clyde.

We need concessions to include a Cul-de-Sac closure @ Boden & La Cienega (before the Chevron & Galpin/Quirke studio rental) and a light @ Jefferson & Clyde.

Please use another sheet if you need more space for your comments.

To submit completed comment sheets, please return to staff member, place in the comment box or mail by April 13, 2015 to:

Sergio Ibarra
Department of City Planning, Environmental Analysis Section
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Responses may also be emailed to:
Sergio.Ibarra@lacity.org