

LETTER NO. 6

Grassroots Venice Neighborhood Council
Post Office Box 2224
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Comment 6-1

The Grassroots Venice Neighborhood Council hereby transmits the following comments to the City Planning Department. The purpose of these comments is to communicate stakeholder concerns and facilitate community input on the proposed Phase Two Playa Vista Project as it relates to Venice. These comments were prepared by a three-member ad hoc [*sic*] subcommittee of the NC Land Use and Planning Committee (“LUPC”) and consist of three sections:

- The first section is a summary of the content of letters received by LUPC from NC stakeholders regarding the DEIR. The actual stakeholder letters are included in Appendix A.
- The second section is a report prepared by an ad hoc subcommittee of the LUPC which was responsible for providing specific comments on the DEIR to the NC Board of Directors. This report raises issues and questions related to impacts on the Venice community from the proposed project. Appendix B is a working list of sensitive receptors in the Venice area.
- The third section is a report from the NC Conservation Committee regarding findings of DEIR deficiencies.

We respectfully request that the City Planning Department address each of the comments of our committees and stakeholders thoroughly, so that our Neighborhood Council may be better informed about the impacts of the proposed project on our stakeholders. Once we are better informed, subsequent to the release and review of the Final EIR or an amended draft EIR, GRVNC will be prepared to take a position on the proposed development.

Thank you for your time and attention to this matter.

Response 6-1

The comment provides background information on the letter submittal. Specific comments regarding the review of the Draft EIR and responses follow.

Comment 6-2

Comments on the Playa Vista Phase Two (“Proposed Project”) Draft Environmental Impact Report (“DEIR”)

These comments, prepared by a 3-member ad hoc subcommittee of the NC Land Use and Planning Committee (“LUPC”), consist of three sections:

- The first section is a summary of the content of letters received by LUPC from NC stakeholders regarding the DEIR. The actual stakeholder letters are included in Appendix A.
- The second section is a report prepared by the ad hoc subcommittee of the LUPC which was responsible for providing specific comments on the DEIR to the NC Board of Directors. This report raises issues and questions related to impacts on the Venice community from the proposed project. Appendix B is a working list of sensitive receptors in the Venice area.
- The third section is a report from the NC Conservation Committee regarding findings of DEIR deficiencies.

Response 6-2

The comment provides background information on the letter submittal. More specific comments with responses follow.

Comment 6-3

Section 1: Summary of content of letters from NC Stakeholders

The main issues raised by the individual stakeholders are: lack of affordable housing at the proposed project, destruction of natural and archeological resources, impacts to the quality of life for Venetians due to increased traffic and loss of aesthetics, concerns about public health and safety due to increased air pollution and methane/toxic gases, lack of real data to support the DEIR’s conclusions regarding significance of impacts or lack thereof; and failure to identify cumulative impacts.

Response 6-3

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. These comments are described further below with responses that address specific Draft EIR and CEQA issues.

Comment 6-4

On affordability, one commenter mentioned that the level and percentage of affordability requirements at Playa Vista should be in proportion to income levels in the metropolitan area.

Response 6-4

The Proposed Project does not result in the removal of any affordable housing units, or the relocation of any households residing in affordable housing units. As such, development of the Proposed Project would have a less than significant impact on affordable housing.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 6-5

On destruction of natural resources, stakeholders are concerned about impact to the bluffs, the wetlands, and trees on the site. Stakeholders feel that the DEIR glosses over the amount of water pollution that the project will produce, and that will detrimentally affect Santa Monica Bay, the Bellflower Aquitard, Ballona Aquifer, and the Silverado Aquifer which lie beneath the proposed project.

Response 6-5

Impacts to the bluffs, wetlands and trees are discussed in Section IV.D, Biotic Resources, of the Draft EIR. The total remaining wetlands in the Proposed Project site are less than 0.7 acre. As summarized on page 548, no on-site wetlands beyond those previously permitted for fill would be impacted by the Proposed Project. In addition, potential impacts to off-site wetlands from pollutants in stormwater runoff and irrigation runoff would have a less than significant impact due to treatment measures built into the Project design, the Riparian Corridor and the Freshwater Marsh. As discussed on page 547, the Bluff Restoration element also has potential to benefit wildlife movement by providing a linkage between two existing fragments of revegetated coastal sage shrub along the Westchester Bluffs east of Lincoln Boulevard. Furthermore, as discussed on pages 530-531, the only trees on the Proposed Project site are some non-native palm trees and a few other non-native trees (as identified in the Environmental Assessment Form contained in Volume II, Appendix A-1, there are approximately 55 non-native palm and eucalyptus trees within the Project site). As envisioned by the design and landscaping concepts presented in Subsection 3.3.1.2.5 of Section IV.O, Visual Qualities (Aesthetics and Views), of the Draft EIR on pages 1167-1168, approximately 800 trees would be planted in the parkways and parks within the Project site.

As stated in Subsection 3.4.1.2.4 of Section IV.C.(2), Water Quality, of the Draft EIR on page 478, water quality impacts to Santa Monica Bay from the Proposed Project would not be significant. The summary of surface water quality in Subsection 3.4.1.2.9 of Section IV.C(2), Water Quality, of the Draft EIR starting on page 506, states that considering all of the inputs to Santa Monica Bay, the quantity of stormwater runoff from the Proposed Project site would be less than significant in comparison. In fact, the adjacent First Phase Project together with the Proposed Project results in net benefits to receiving waters listed in the Basin Plan, including the Ballona Wetlands, Ballona Estuary, and Santa Monica Bay. Moreover, any potential increases in

pollutant loading would be addressed through the implementation of mitigation measures discussed in Subsection 4.0 of Section IV.C.(1), Hydrology, of the Draft EIR on page 394, and Section IV.C.(2), Water Quality, of the Draft EIR on page 517. These mitigation measures include the completion, or otherwise guaranteed completion, of the Freshwater Marsh, Riparian Corridor and other structural/treatment control BMPs, which would improve existing flood control infrastructure with water quality enhancements that will result in no increase in pollutant concentrations to the Santa Monica Bay, as stated in Subsection 3.4.1.2.4 of Section IV.C.(2), Water Quality, of Draft EIR on page 476.

Subsection 2.2.3 of Section IV.I, Safety/Risk of Upset, of the Draft EIR starting on page 682, addresses the sampling, characterization and delineation of the contamination in the aquitard/aquifer system under and adjacent to the Proposed Project site that is being conducted under the Regional Water Quality Control Board's Cleanup and Abatement Order No. 98-125. As discussed in Section IV.I., Safety/Risk of Upset, of the Draft EIR on page 681, groundwater (along with soil) contamination has occurred as a result of past activities on the Proposed Project site, including aircraft-related and other industrial activities. The Proposed Project would not cause further contamination of groundwater (or soil). As discussed in Subsection 3.4.2 of Section IV.I, Safety/Risk of Upset, of the Draft EIR starting on page 723, construction and operation of the Project is not expected to significantly impact the rate or change in direction of the groundwater. Subsection 3.4.2 of Section IV.C(2), Water Quality, also addresses how the Proposed Project would not impact the drinking water system as the groundwater in the area of the Project is not currently used for drinking water. Finally, development of the Proposed Project is not expected to cause further contamination of groundwater (or soil).

Comment 6-6

Also, stakeholders are concerned about destruction of native people's burial grounds which are environmental treasures in their own right.

Response 6-6

Potential impacts to archaeological resources, including impacts on Native American burials, associated with the Proposed Project are addressed in Section IV.P.(2), Archaeological Resources, of the Draft EIR, beginning on page 1199. The Draft EIR identifies and discusses the potential impacts on CA-LAN-62, CA-LAN-211/H, CA-LAN-1932H, and CA-LAN-2769 and concludes, on page 1224, that implementation of the Programmatic Agreement (Appendix O-I) of the Draft EIR and mitigation measures listed in the Draft EIR would reduce impacts on archaeological resources to a less-than-significant level. The details regarding the cultural resources encountered within the Proposed Project site and treatment plans to address those resources are presented in Appendix O-3 of the Draft EIR, as well as the 1991 Research Design and Data Recovery Plan for CA-Lan-62 and CA-Lan-211, which have been included in the Appendices of the Final EIR.

As reported in the 1991 Playa Vista Archaeological and Historical Project Research Design, archaeological excavations of the western portion of Area D in the 1940s and 1950s, uncovered

Native American burials. The current archaeological activities in the western portion of Area D, which have uncovered Native American burials, are part of the Playa Vista First Phase Project. These activities were approved by the City as part of the First Phase Project in a separate EIR (EIR No. 90-0200-SUB(C) (CUZ) (CUB), State Clearinghouse No. 90010510, certified by the City in September 1993. These activities are in compliance with the Programmatic Agreement and the requirements of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98.

The exact location of burials and other archaeological resources is not easily predicted, and there are instances where human remains and artifacts are found during construction. As identified in the mitigation measures included in Subsection 4.0 of Section IV.P.(2), Archaeological Resources, of the Draft EIR on pages 1222-1223, efforts will be made to avoid human remains and other archaeological resources. In cases where human remains are encountered, the Applicant shall comply with the Programmatic Agreement and the requirements of the California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98.

The Most Likely Descendant designated by the Native American Heritage Commission for Playa Vista has provided guidelines for the handling of human remains. These guidelines are being implemented to the extent feasible by the Applicant.

Comment 6-7

On aesthetics, many stakeholders are displeased with the look of the Playa Vista Phase One development. Many people feel that they were deceived by Playa Vista's models of the development when Phase One was proposed back in the early 1990's. Some mention that the Phase One development looks like "a ghetto."

Response 6-7

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. The comment addresses issues that relate to the First Phase Project and not the Proposed Project.

Comment 6-8

Traffic congestion is the number one issue for the commenters. Some suggest the need for rail, mass transit, bike and pedestrian zones. Some suggest that the City should wait to approve the proposed project until the full impact of the Phase One project is known. Stakeholders also raise concern [*sic*] about the DEIR's statement that mitigations cannot be insured if the measures are "infeasible" or "permits cannot be obtained."

Response 6-8

Traffic congestion is addressed in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 798. The traffic analysis includes consideration of and mitigation measures relating to transit. Bikeway plans and linkages are discussed in Section IV.K.(3), Bicycle Plan, of the Draft EIR, beginning on page 953.

With respect to the comment that the City should wait to approve the proposed project until a full impact of the Playa Vista First Phase Project is known, this comment is addressed in Topical Response TR-9, Traffic: First Phase Project (VTTM 49104) Condition No. 116, on page 470. With respect to mitigation, please See Topical Response TR-8, Significant Impacts May Remain, on page 468.

Comment 6-9

Finally, one commenter mentions that compliance with mitigations cannot be guaranteed, and thus the DEIR should include some sort of requirement for the developer to enter into a covenant and agreement, so that if the developer fails to fulfill its mitigation requirements, legal remedies are available to those impacted by that failure.

Response 6-9

As with any project in the City of Los Angeles, the Lead Agency will monitor compliance with all mitigation measures required for the Proposed Project. Mitigation measures proposed for the Proposed Project are included in the Draft Mitigation Monitoring and Reporting Program (MMRP) in Appendix C. The MMRP provides an enforcement agency for each mitigation measure. Compliance with mitigation measures also would be monitored throughout the Project's permitting process; e.g., tract recordations, grading, building permits, etc. Those permits would not be issued until appropriate mitigation measures are assured.

The remaining comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 6-10

With regard to the DEIR's lack of real data, stakeholders state that real data must supersede models, and that the City should obtain real data, on the Phase One project to assist the City's impact analysis for the Phase Two development proposal.

Response 6-10

The transportation model is developed and calibrated using actual traffic counts, street system operating conditions and related projects. The model was validated on an overall basis to within

1 to 2% variance between model generated traffic and actual counts. Please See Topical Response TR-1, Playa Vista Transportation Model, on page 445, for a discussion of the data and methodology used for the traffic study. Further, the Draft EIR has used “real data” extensively (See e.g., Section IV.B., Air Quality, Section IV.D., Biotic, Section IV.C.(2), Water Quality and Section IV.K.(1), Traffic and Circulation).

Comment 6-11

With regard to the DEIR’s cumulative impact analysis, one commenter points out that the DEIR improperly excludes major projects in the Venice area. These projects include Lincoln Place, Lincoln Center Redevelopment, Trammell Crowe [*sic*] project, and the Walgreen’s project, among others.

Response 6-11

The Draft EIR considered and incorporated conservative assumptions regarding identifying the list of related projects and analyzing cumulative impacts. The list of related projects was developed via consultation with the adjoining cities and the County of Los Angeles with regard to relevant areas of unincorporated Los Angeles County. A comprehensive discussion of related projects is provided in Topical Response TR-3, Related Projects, on page 453. See Response to Comment 6-12, below, for a discussion of the specific projects raised in this comment.

Furthermore, the analysis is conservative in two ways. The related projects list includes over 31 million square feet of commercial and industrial development as well as over 9,300 residential units. To account for additional cumulative development, the EIR assumed an additional growth factor of 10% of commercial and industrial development and 25% of residential development. These additional increments account for over 3.1 million square feet of commercial and industrial development as well as over 2,300 residential units. Therefore, the Project’s related projects represent a total of over 34 million square feet of commercial and industrial development as well as over 11,600 residential units. In addition, the traffic analysis was conducted using a transportation model based on the Southern California Association of Governments (SCAG) regional model, which included the socioeconomic and land use growth anticipated by SCAG for the entire region. Interpolation between 2000 and 2015 socioeconomic datasets produced land use and traffic growth patterns for the Year 2010 to be used as the Future Cumulative Base projections. To check the validity of the SCAG projections, each of the cities within the study area was asked to supply a list of their related background projects, including projects in development or anticipated to be developed and open by 2010. This list was compared against the land use assumptions for each traffic analysis zone (“TAZ”) to determine whether each TAZ included sufficient land use growth to accommodate the related projects. Additional land use development was added to those TAZs that did not have sufficient growth based on SCAG’s forecast. While additional development was added where required, corresponding reductions in land use was not taken in those instances where the cumulative development was less than that forecasted by SCAG. Thus, the amount of cumulative land use development assumed in the traffic model exceeded that assumed in the related projects list.

Comment 6-12Section 2: LUPC ad hoc Subcommittee Report on DEIR

This report focuses on the major impacts to Venice resulting from the proposed project, and lists major deficiencies in the DEIR as they relate to Venice.

A. THE LIST OF RELATED PROJECTS IS WOEFULLY INACCURATE, THUS CUMULATIVE EFFECTS, IN PARTICULAR FOR TRAFFIC, AIR QUALITY AND SAFETY, ARE INACCURATELY ASSESSED.

COMMENT: The list of related projects includes but one project in Venice, the Harley Davidson project. This is wholly inadequate and cannot stand up under CEQA scrutiny.

Venice is currently experiencing intense growth, including some very large projects. For example, the Lincoln Center Redevelopment project on Lincoln Blvd will double retail space and add over 300 new dwelling units. The Trammel Crow Oxford Triangle Project will add 298 dwelling units. St. Joseph Center will double current space. Other related projects include several large condominium/retail projects on Ocean Front Walk, large loft complexes on Hampton, and the Lincoln Place Redevelopment Project, which, according to new owner AIMCO, has the potential 1300 newly built apartments.

1. REQUEST FOR RESPONSE: In order to adequately address impacts to traffic and air quality, it is imperative that all major projects in the Venice area, such as the ones listed above, are considered in the cumulative impacts analysis. In the area of traffic, for example, any one of these projects, when properly included, may mean the difference between a LOS D>E, E>F or the .02 increase in V/C. Thus, by excluding all but one project in Venice, the DEIR thoroughly misrepresents projected traffic and pollution on Lincoln Blvd, Venice Blvd, Walgrove, Rose, Washington Blvd, Glencoe, Palms, Lake, Abbot Kinney Boulevard, Electric, Hampton, Pacific, and Main Street. Special attention must be paid to the traffic impacts at Lincoln Blvd & California, Lake, Rose, Palms, Superba and Venice Blvd. (corners heavily impacted by Lincoln Center and Lincoln Place) and the intersections of Lincoln Blvd. & Washington; Maxella & Mindanão; Washington & Glencoe; and Abbot Kinney & Washington; (heavily impacted by Trammel Crow and Walgreen's). With current development on Abbot Kinney the EIR needs to look at its intersections with California and Main Street. Likewise Rose and Main and Rose Hampton should be considered. Have related projects in other areas, e.g. Mar Vista, Westchester, Culver City, Santa Monica, Marina del Rey and Playa del Rey similarly been ignored? Many of the projects in Marina del Rey, such as Channelgate are not yet fully populated.

Response 6-12

The Draft EIR provides a conservative analysis of cumulative traffic impacts. This analysis includes conservative assumptions for growth in the Venice area and includes a conservative analysis of traffic and air quality impacts from traffic raised in the comment.

The traffic impact analysis in the Draft EIR uses a transportation model based on the Southern California Association of Governments (SCAG) regional model. This model includes all of the socioeconomic and land use growth anticipated by SCAG in the entire region. Each of the cities within the hundred square mile traffic study area was asked to provide a list of their related background projects. All related projects for which an application had been filed prior to the issuance of the NOP for the Village at Playa Vista were included in the related projects list. This generated a list of 96 related projects, illustrated on page 194 of the Draft EIR.

Traffic projections were prepared for all of these related projects for each traffic analysis zone in the study area. The traffic growth in the model from SCAG projections was then compared to the location of the related projects to make sure that sufficient traffic growth was assumed in each traffic analysis zone in order to ensure that cumulative traffic in each traffic analysis zone conservatively reflected each of the related projects. For those few zones where sufficient traffic growth did not appear in the SCAG model, traffic from the known related project was added to the model's trip table.

A detailed investigation of the projected growth in each traffic analysis zone (TAZ) showed that the traffic model used in the Draft EIR assumed sufficient growth to account for all of the projects discussed in this comment.

The Trammel Crow project referenced in the comment is a residential community consisting of 298 apartment units, and a parking structure with 670 stalls. According to environmental documents for that project, the project would generate about 1,912 trips per day, with 136 trips during the morning peak hour, and 187 trips during the evening peak hour. As noted above, the traffic model in the Draft EIR assumes sufficient growth in the applicable traffic analysis zones to account for these trips and cumulative air quality impacts resulting from traffic.

With respect to the Lincoln Place project, Lincoln Place is a 32 acre, 700-unit housing complex built in 1951, and is owned by AIMCO. There is no formal proposed project regarding Lincoln Place at this time. Development proposals previously contemplated for this site, as well as potential proposals involve the replacement of the existing apartments with new condominiums. As a result, the potential net increase in units would result in an incremental increase in peak hour net trip generation. In the absence of a formal proposal, however, any assumption regarding a proposed Lincoln Plan project would be speculative. Regardless the cumulative impacts analysis in the Draft EIR provides a conservative set of assumptions to capture future growth. Even in the event 1,300 new apartments were proposed for the Lincoln Place project, the traffic model in the Draft EIR assumes sufficient growth in the applicable traffic analysis zones to account for these trips and cumulative air quality impacts resulting from traffic.

The Walgreens under construction at the southwest corner of Lincoln/Washington involves the replacement of a retail building that existed and was in operation at the time of the traffic counts for the Village at Playa Vista project. Thus the trip generation for this project was included in the background traffic conditions.

The Lincoln Center project, as well as another project located along Lincoln Boulevard within the Venice Community, the Harley Davidson project, were included in the List of Related Projects as project numbers 88 and 7, respectively, in Table 5, presented Section III.B., Identification of Related Projects, beginning on page 193 of the Draft EIR.

Other projects mentioned in the comment include a four unit apartment complex with retail on the ground floor at 619 Ocean Front Walk (existing use is a pay parking lot), a 49 unit apartment complex at 615 Hampton Ave. and 35 unit apartment complex at 602 Main Street (i.e., “large loft complexes”), and the replacement of the existing 11,000 sq. ft. facility at St. Joseph’s Center with a new 30,000 sq. ft. facility (i.e., the “doubling of current space”). According to the Grassroots Venice Neighborhood Council Land Use and Planning Committee’s Project Initiation Form submitted on this project, the St. Joseph’s Center project is intended to accommodate existing programs, and no significant increase in peak traffic generation is anticipated. As noted above, with respect to these projects, a detailed investigation of the projected growth in each traffic analysis zone (TAZ) showed that the traffic model used in the Draft EIR assumed sufficient growth to account for all of these projects.

With respect to the specific intersections raised in the comment, a total of 12 key signalized intersections along Lincoln Boulevard between Jefferson Boulevard and the I-10 freeway ramps were included in the study. The study determined that no significant impacts would occur north of Venice Boulevard with the construction and occupancy of the Proposed Project. As shown in Figure 74, Section IV.K.(1), Traffic and Circulation, of the Draft EIR, the proposed project would have significant impacts at six and eight intersection locations along Lincoln Boulevard between Jefferson Boulevard and Venice Boulevard during the A.M. and P.M. peak hours, respectively, prior to mitigation. With implementation of the mitigation measures, no significant impacts would remain at any location on Lincoln Boulevard. Please see Topical Response TR-7, Study Intersections, on page 463, for a detailed discussion of the process used in the selection of locations for analysis, including the Lincoln Boulevard intersections.

The study analyzed all signalized intersections along Lincoln Boulevard between Jefferson Boulevard and Venice Boulevard and all arterial intersections north of Venice Boulevard to the I-10 freeway. The other intersections along Lincoln Boulevard between the I-10 and Venice Boulevard, suggested by the commentor, are with local and collector streets. The project traffic and consequently, its impacts decrease as one travels farther from the Project site. Given the decrease in project trips north of Venice Boulevard, the small incremental level of Project impact at Lincoln Boulevard and Rose Avenue and other arterial intersections along the corridor north of Venice Boulevard, and the lower level of cross street traffic on collectors and locals than on arterials, the Proposed Project would not be expected to have significant impact at intersections with collector and local streets along the corridor north of Venice Boulevard. Similarly, the study determined that no significant impacts would occur along Abbott Kinney Boulevard since

both the intersection locations of Abbott Kinney Boulevard at Venice Boulevard and Abbott Kinney Boulevard at Main Street on either side of the suggested locations were not significantly impacted by the Proposed Project, as shown in Table 119 in Section IV.K.(1), Traffic and Circulation, of the Draft EIR on pages 847 and 848. The intersection of Rose Avenue and Main Street was analyzed in the Draft EIR (Intersection No. 55), and no significant impact would occur at this location. Given that this location was not significantly impacted, and the fact no substantial amount of project traffic is anticipated to use Hampton Avenue, no significant impact would occur at Rose Avenue and Hampton Avenue.

As discussed in Sections 3.1 and 5.1.5 of the Draft EIR, the Traffic Study included an analysis of the Proposed Project's traffic impacts under two baseline scenarios (i.e., with and without Playa Vista Drive Bridge and Road). The conclusions above are the same under either baseline scenario. Please see Section II.15, Corrections and Additions of the Final EIR and Topical Response TR-10, Alternative 2010 Baseline Scenario, Additional Mitigation Measure, on page 472. Also see Topical Response TR-3, Related Projects, on page 453 for a discussion on the issue of Related Projects and their cumulative effects. See also Response 6-11.

Comment 6-13

COMMENT: The number of signaled intersections is incomplete. Many of these intersections which are not included in the DEIR are listed as LOS D, E or F in mitigated negative declarations prepared for Venice projects.

2. REQUEST FOR RESPONSE: All signaled intersections on Lincoln Blvd between Jefferson and the 1-10 should be analyzed for traffic impacts.

Response 6-13

The Traffic Study included in Appendix K-2 of the Draft EIR used a systematic process in selecting intersections for evaluation. This process is described in detail in Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 828, as well as in the Appendix referenced above. The selection process resulted in the evaluation of 218 intersection locations including 17 Congestion Management Program (CMP) intersections and 11 CMP freeway segments within a 100-square mile area on the west side of Los Angeles in the study. A total of 12 key signalized intersections along Lincoln Boulevard between Jefferson Boulevard and the I-10 freeway ramps were included in the study. The study determined that no significant impacts would occur along Lincoln Boulevard north of Venice Boulevard with the construction and occupancy of the Proposed Project. As shown on Figure 74 in Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 867, the Proposed Project would have significant impacts at six and eight intersection locations along Lincoln Boulevard between Jefferson Boulevard and Venice Boulevard during the A.M. and P.M. peak hours, respectively, prior to mitigation. With implementation of the mitigation measures, no significant impacts would remain at any location on Lincoln Boulevard. Please see Topical Response TR-7, Study Intersections, for a detailed

discussion of the process used in the selection of locations for analysis, including the Lincoln Boulevard intersections.

As part of the 218 intersections analyzed, the study analyzed all signalized intersections along Lincoln Boulevard between Jefferson Boulevard and Venice Boulevard and all arterial intersections north of Venice to the I-10 freeway. The other intersections along Lincoln Boulevard between the I-10 and Venice Boulevard, suggested by the commentor, are with local and collector streets. The project traffic and consequently, its impacts decrease as one travels farther from the Project site. Given the decrease in project trips north of Venice Boulevard, the small incremental level of Project impact at Lincoln Boulevard and Rose Avenue and other arterial intersections along the corridor north of Venice Boulevard, and the lower level of cross street traffic on collectors and locals than on arterials, the Proposed Project would not be expected to have significant impact at intersections with collector and local streets along the corridor north of Venice Boulevard. Therefore, all the key locations along Lincoln Boulevard that could potentially be impacted by the Proposed Project were included in the environmental analysis presented in the Draft EIR.

Comment 6-14

COMMENT: As neighborhood council meetings in Venice indicate, our neighborhoods are already experiencing high levels of cut-through traffic on residential streets, including Palms, Centinela, Walgrove, McLaughlin, Grandview, Rose, Palms, Inglewood, Glencoe, and Sawtelle. Many of these streets are now effectively functioning as arterials. The DEIR is wholly inadequate in addressing current traffic levels on these streets and projected additional cut-through traffic on these streets resulting from the proposed project, and in conjunction with the cumulative effects of related projects listed above.

3. REQUEST FOR RESPONSE: The Draft EIR must include current levels on all these streets, projected levels with Playa Vista ANDALL RELATED PROJECTS, as well as project which additional streets will fall victim to cut-through traffic.

Response 6-14

The Playa Vista Transportation Model is discussed in Topical Response TR-1, Playa Vista Transportation Model, on page 445. The transportation policy planning criteria seeks to focus traffic on arterials and collector streets and away from residential streets. Thus, the transportation planning criteria seeks to provide capacity on arterials and collector streets thereby providing travelers with the most efficient traffic routes. Consistent with this process, the traffic model includes freeways, major arterials, secondary arterials, collector streets, and key local streets. The model was validated on an overall basis to within a 1 to 2 percent variance between model-generated traffic and actual counts. The model does not assign trips along local residential streets because the transportation planning criteria seeks to keep traffic off of local residential streets. In this manner, capacity is designed into the freeways, arterials and collectors, in order to minimize the need for use of local streets.

In order to estimate potential neighborhood traffic impacts, a second analysis was done to address neighborhood and cut-through traffic. Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 872, presents an analysis of potential neighborhood impacts that could be caused by project traffic. This analysis includes the Venice community. As discussed in Subsection 3.4.7, the Proposed Project will not result in any significant impacts on neighborhood traffic in the Venice area. Additional details of this analysis can be found in Appendix K-2, Traffic Study Appendix Volume 1D, and Topical Response TR-5, Neighborhood Traffic Impacts, on page 458. It should be noted that all of the streets mentioned above are classified as collector streets or arterials, not local residential streets. The City of Los Angeles considers the issue of cut-through traffic as it relates to local residential streets, not collector streets or arterials such as those mentioned in this comment.

Comment 6-15

COMMENT: The threshold of 12.5% beyond today's levels in gauging a significant impact is too high; current levels are already too high and create a great danger to children and bicyclists and generate too much noise and air pollution in these R-1 zones.

4. REQUEST FOR RESPONSE: Please revise the threshold value to reflect actual on-the-ground realities, so as to obtain a more realistic assessment of significant impacts.

Response 6-15

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

This comment refers to significance criteria for neighborhood traffic impacts. These thresholds are set forth in the City of Los Angeles Draft CEQA Thresholds Guide, as stated on page 833 of the Draft EIR. Please See Topical Response TR-5, Neighborhood Traffic Impacts, on page 458, for details on the issue of significant neighborhood traffic impacts.

Comment 6-16

COMMENT: What is the basis for choosing 10% of drivers on a clogged arterial will exit and use alternative parallel routes? (The DEIR states that with an increase in 1200 vehicles, 120 will use residential streets as an alternative). The figure appears quite speculative. The DEIR also fails to take into account the number of drivers who, having experienced a clogged artery several times, will no longer attempt to use this route and will automatically select the alternative route to the main artery. For instance, it is well known that many local residents never use the I-405 between 3:30 and 7:30 because they assume traffic will not be flowing.

5. REQUEST FOR RESPONSE: Please provide the data that supports the conclusion that only 10% of drivers on a clogged arterial will exit and use alternative parallel routes. Please provide

the data that takes into account the number of drivers that are projected to avoid the main arterials, and use alternative routes instead, especially during peak times. If there is no such data, please include this factor in your equations and recalculate the percentage of drivers that will use alternative parallel routes, so as to accurately reflect the traffic impacts of the proposed project.

Response 6-16

As stated in Subsection 3.4.7, Section IV.K.(1), Traffic and Circulation, on page 873 of the Draft EIR,

- First, the analysis identified the corridors where the Proposed Project's additional traffic to the corridor could be such that the volume shifting to an alternative route could exceed the minimum significance threshold of 120 or more daily trips. The majority of vehicles on an arterial corridor tend to remain on that corridor even under congested conditions, with only a small portion of motorists inclined to seek alternative routes. Therefore, corridors were examined to which the Proposed Project may add 1,200 or more daily trips, assuming that at most 10 percent of these trips may shift to alternative routes.

Traffic is only anticipated to divert from arterials to local streets during periods of heavy congestion, which correspond to the morning and afternoon peak hours. Approximately 10 percent of the project's average daily traffic occurs in each of the peak hours. Based on the City's threshold of significance for neighborhood traffic intrusion impacts to an individual local street, a minimum of 1,200 project-related trips per day along a particular corridor would cause at least 120 trips to be diverted from the corridor to surrounding local streets when the corridor is congested, if alternative "cut-through" routes are available. This would occur mainly during peak hours where either 100% of the project trips would divert to a local street in the morning or afternoon peak hour, 50% would divert in both the A.M. and P.M. peak hours, or some combination thereof. Because diversion to local streets is a function of congestion on corridors, cars would not be expected to divert during periods of better traffic flow. Therefore, the methodology does not assume "that only 10% of drivers on a clogged arterial will exit and use the alternative parallel routes."

Please see Topical Response TR-5, Neighborhood Traffic Impacts, on page 458, for details on the issue of significant neighborhood traffic impacts. Please also See Topical Response TR-1, Playa Vista Transportation Model, on page 445, for a discussion of the traffic study model.

Comment 6-17

COMMENT: The I-405 freeway is already beyond capacity between Wilshire in Santa Monica and the I-105 at peak hours and cannot accommodate any more traffic. The DEIR is wholly misleading because it assumes that the 405 can accommodate more vehicle trips at peak hour.

Response 6-17

Please See Topical Response TR-1, Playa Vista Transportation Model (PVTM), on page 445, for a detailed discussion on traffic assignment and path choice. The San Diego (I-405) freeway will be available to all users, including the Proposed Project. However, the Model correctly assigns a very limited number of project trips (approximately 50 to 70 trips) during the peak hours to the I-405 freeway due to existing and continuing congestion. It is worth noting also that the I-405 freeway High Occupancy Vehicle (HOV) lanes are scheduled to be built between the I-105 where it currently ends and north of the I-10 freeway by the year 2010. The Draft EIR concludes on page 872, there is no significant impact on the San Diego (I-405) freeway.

Comment 6-18

COMMENT: The only mitigation for traffic impacts on Lincoln Blvd., is priority signalization for busses [*sic*]. Since many intersections on Lincoln Boulevard either presently function at LOS E or F, or will due to implementation of the proposed project, this “signalization for buses” is virtually no mitigation at all. What purpose is served if a bus crosses the intersecction, [*sic*] then cannot drive further? Priority signalization slows down traffic. What is needed are computerized coordinated signals, to create what is called “gruene Welle” in German or “green wave,” which are signals that are programmed such that, traveling at a constant speed, one should hit all green lights. This is common in Europe, such as Germany, and should be analyzed as a possible mitigation measure for Lincoln Boulevard.

Response 6-18

As noted by the commentor, many intersections are already operating at LOS E or F along Lincoln Boulevard. The proposed traffic mitigation measures are intended to mitigate the Proposed Project's significant impacts. These mitigation measures are discussed in Subsection 4.0 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 887. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue/Jefferson Boulevard identified in the Draft EIR. With implementation of the mitigation measures, the Proposed Project would not result in any significant traffic impacts, including all locations along the Lincoln Boulevard corridor.

The proposed mitigation includes enhancing the existing coordinated computerized signal system along Lincoln Boulevard to include real-time control of schedule adherence and improvement of flow of buses (that are spatially located by the system) through intersections without sacrificing overall vehicular system delays. This is achieved through the implementation of a “Transit Priority System” module in the currently existing advanced computerized signal system, designed and operated by the City Department of Transportation.

Further, Automatic Traffic Surveyance and Control System (“ATSAC”) improvements are being implemented along Lincoln Boulevard as part of the previously approved Playa Vista First Phase Project. These improvements are designed to achieve what the commentor suggests by maximizing signal efficiency along the corridor.

The Transit Priority System will improve the performance of buses along the Lincoln Boulevard corridor, including the five buses purchased for the Santa Monica Big Blue Bus Line along this corridor by the Playa Vista First Phase Project.

Comment 6-19

6. REQUEST FOR RESPONSE: In order to gauge the accuracy of the model to determine the number of car trips generated by the proposed project, the NC requests the City conduct the following study: measure the car trips presently generated from Playa Vista Phase One project, compare these to the projected numbers contained in the Phase One EIR, and then factor in the percentage of units *presently and actually* occupied compared to the number of units provided by the entire Phase One project. An actual count of all exits and entrances over a two-week period at all hours of the day is suggested. In addition, it is advisable to request of all residents and workers at Playa Vista Phase One to complete a survey including, number and times of trips per day, departure point, route and final destination. As Playa Vista represents new development, the variables are very limited and so one should be able to obtain a very accurate picture of trip counts and routes.

Response 6-19

The trip generation for the Proposed Project was developed using the rates and equations from the nationally-accepted Informational Report *Trip Generation, VI Edition, 1997*, published by the Institute of Transportation Engineers (“ITE”). The ITE document uses a statistically valid number of data points (i.e., residential driveway counts) in developing residential trip information. ITE uses a similar methodology for office and commercial uses. The Proposed Project size, consisting of residential, office, and other commercial uses, would all fall within the size range of survey data used in the development of ITE Trip Generation Rates and Equations for the respective land uses.

The ITE document is a reliable source of information that provides statistically valid data (regression equations and weighted average rates) on trip-making for the project uses based on actual surveys performed around the Country. This is the state-of-the-art industry standard document for Trip Generation utilized around the Country and in the City and County of Los Angeles.

This report is used by transportation agencies throughout the nation, including the City and County of Los Angeles and numerous other cities throughout Southern California to estimate trip generation for projects.

Please See Topical Responses TR-1, Playa Vista Transportation Model, and TR-2, Trip Distribution, on pages 445 and 451, respectively, for discussion on trip distribution, path choice and model validation.

Comment 6-20

COMMENT: At the recent “Envisioning Workshop” a number of community members expressed their sense the the [sic] highest volume traffic on Lincoln Blvd is on Saturday and Sunday afternoons between 2:00 and 7:00. This is due to both shopping excursions and beach recreation. The DEIR fails to justify its assumption that peak hour periods occur Monday-Friday in this beach coastal town, nor to assess impacts on weekends with the high influx of regional and tourist beach visitors. The same may be said to apply to Pacific Blvd, Main Street and Abbot Kinney, which include Sunday mornings as well.

7. REQUEST FOR RESPONSE: The Draft EIR must include current levels on all these streets on weekends and include summer data, projected levels with Playa Vista AND ALL RELATED PROJECTS, as well as project which additional streets will fall victim to cut-through traffic.

8. REQUEST FOR RESPONSE: The Draft EIR must justify its assumption of when peak hour periods occur in light of the fact that coastal town traffic does not necessarily follow the patterns of inland traffic used in the Draft EIR models.

Response 6-20

The weekday A.M. and P.M. peak hour was used in evaluating the Proposed Project’s impacts based on the Proposed Project’s trip generation and the traffic volume on the street system. The Proposed Project’s trip generation is highest during the weekday morning and afternoon commute period than during any other hours of the week.

Traffic counts in the Los Angeles area are generally higher during the typical weekday peak periods, due to the high number of work-related trips. It is recognized that weekday counts on a day-to-day basis will vary, as will counts during weekday-to-weekend periods. These variations generally are not material. A sample of previous trip counts demonstrates that for both coastal and inland streets in the traffic study area, the weekday peak hour is the appropriate measure for analyzing the Proposed Project’s traffic impacts. Summer traffic counts were obtained for nine locations in the coastal corridor within the study area. Only one of the counts was slightly higher in the weekend period. At seven of the nine locations, the highest traffic volume occurred during the non-summer weekday commute peak period. In one instance, the summer weekend peak hour was virtually identical to the non-summer weekday count. At one location, the weekend count was slightly higher in the weekend period. This is not a material difference and does not affect the level of significance of any impacts at that location. On an overall basis, non-summer weekday commute peak hour traffic counts at these locations were 10-15% higher than the summer weekend peak traffic counts, indicating that on a system-wide basis, the non-summer weekday commute peak hour analysis in the Draft EIR represents conservative worst-case traffic conditions.

Table 155 on page 812 of the Draft EIR provides 2003 data for streets within the study. As discussed above, this data is the 2003 non-summer weekday A.M. and P.M. peak-hour data. Further, the Draft EIR provides intersection data for the 2010 projected levels with the Proposed Project and all related projects. With respect to cut-through traffic issues, the traffic model includes freeways, major arterials, secondary arterials, collector streets, and key local streets, and the 2010 traffic volume data reflects any cut-through traffic on these streets and highways. In addition, cut-through traffic through neighborhoods is discussed in Response 6-14 above and in Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 872. As discussed in Subsection 3.4.7, the Proposed Project will not result in any significant impacts on neighborhood traffic in the Venice area.

Comment 6-21

B. THE DEIR FAILS TO COMPLY WITH CEQA BECAUSE THE DEIR ADMITS THAT FEASIBILITY OF MITIGATION MEASURES IS NOT GUARANTEED

COMMENT: Section V.I. (1) page 887 contains the proposed project mitigation measures, referred to as the “Village at Playa Vista Transportation Improvement Measures.” The DEIR states that if any of the proposed mitigation measures are “determined not to be feasible or if it is not possible to obtain the necessary permits, then a significant impact(s) will remain.” Such disclaimers enable the decision-making body to avoid making a determination of “overriding considerations” at the time of EIR approval. In addition, such a disclaimer enables the decision-making body and project applicant to avoid a serious and detailed analysis of feasible mitigation measures that will certainly reduce the significance of an impact.

1. REQUEST FOR RESPONSE: If a mitigation measure is potentially infeasible, then the project should either be scaled back until no “significant impact(s) will remain,” or the DEIR should assume that the significant impact cannot be reduced to a level of insignificance by the mitigation measure.
2. REQUEST FOR RESPONSE: The DEIR should address feasibility of mitigation measures and the specific permitting challenges for each individual mitigation measure so that the responsible decision-making bodies can accurately assess impacts.

Response 6-21

While none of the proposed mitigation measures are anticipated to be infeasible, past experience demonstrates that there are occasions where mitigation measures later become infeasible or, if they are located outside of the lead agency's jurisdiction, are not approved by these other jurisdictions. The statement that “if any of the proposed mitigation measures are determined to be not feasible or if it is not possible to obtain the necessary permits, then a significant impact will remain” is not a disclaimer, but a statement to inform the reader and decision-makers of this possibility. The commentator requests that the Proposed Project either be scaled back until there is no significant impact or that the Draft EIR assume that the significant impact cannot be reduced

to a level of insignificance by the mitigation measure. The latter is precisely what the Draft EIR does by informing the reader and the decision-makers that a significant impact may remain in the event a mitigation measure is infeasible or the necessary permits may not be obtained.

The commentor states that the Draft EIR should address the feasibility of the mitigation measures and the specific challenges for each individual mitigation measure. The technical feasibility of all physical mitigation measures has been established through a detailed and rigorous process including field visits and conceptual engineering evaluation. The established technical feasibility can be observed by examining the improvement exhibits provided in Appendix K-1, Attachment G, and in Appendix K-6 of the Draft EIR. These exhibits have been reviewed and conceptually approved by the City Department of Transportation. The challenges to their approval are discussed in the first paragraph above and are based on the fact that some of mitigation measures are located outside the lead agency's jurisdiction and past experience demonstrates that there are occasions where a mitigation measure may later become infeasible.

This issue is discussed in greater detail in Topical Response TR-8, Significant Impact May Remain, on page 468.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 6-22

C. THE DEIR IGNORES THE FACT THAT THE PROPOSED PROJECT VIOLATES GENERAL PLAN POLICIES

COMMENT: The Los Angeles General Plan, subsection Venice Community Plan, contains several very important Goals in the Transportation Section. The General Plan and the individual Community Plans, are required by § 65300 to be “the fundamental policy document of the City of Los Angeles.” Relevant Goals are as follows:

- Goal 14—Discourage non-residential traffic flow on residential streets and encourage community involvement in determining neighborhood traffic controls.
- Goal 16—Provide a circulation system which supports existing and planned land uses, while maintaining a desired level of service at all intersections on our highways, freeways and streets.
- Goal 16-2.1—No increase in density shall be effected by zone change, Plan amendment, subdivision or other discretionary action unless it is determined that the transportation infrastructure serving the property can accommodate the traffic that would be generated.

o Program: Decision-makers shall adopt a finding with regards to infrastructure adequacy as part of their action on discretionary approvals that result in increased density or intensity.

COMMENT: An analysis of Attachment C of LADOT’s “Initial Traffic Impact Assessment for the Proposed Village at Playa Vista Project,” EIR Volume XX, indicates that 31 Intersection-Peak Hour periods currently operating at LOS “D” or better will not be maintained at LOS “D” after the proposed project. This violates the Venice Community Plan, Policy 16-1.1 [a], which states that the City is to “Maintain a satisfactory LOS [Level of Service] for streets and highways that should not exceed LOS “D” for Major Highways, Secondary Highways and Collector Streets.”

1. **REQUEST FOR RESPONSE:** Does the City agree that a violation exists? If not, please explain why. If so, please explain how the DEIR addresses this violation in accordance with CEQA and other applicable laws.

COMMENT: An analysis of Attachment C of LADOT’s “Initial Traffic Impact Assessment for the Proposed Village at Playa Vista Project,” EIR Volume XX, indicates there are 15 Intersection-Peak Hour periods currently operating at LOS “E” or worse that will not be maintained at LOS “E” after the proposed project. This violates the Venice Community Plan, Policy 16-1.1 [b], which states that, “If existing levels of service are LOS “E” or LOS “F” on a portion of a highway or collector street, then the level of service for future growth should be maintained a [*sic*] LOS “E” if possible.”

2. **REQUEST FOR RESPONSE:** Does the City agree that a violation exists? If not, please explain why. If so, please explain how the DEIR addresses this violation in accordance with CEQA and other applicable laws.

3. **REQUEST FOR RESPONSE:** If the City believes that it is impossible to improve these intersections to LOS “E,” please explain why. How does the City justify approving developments, which generate significant volumes of traffic, further degrading intersections that are already at unacceptable Levels of Service under the General Plan?

COMMENT: Analysis of Attachment C of LADOT’s “Initial Traffic Impact Assessment for the Proposed Village at Playa Vista Project,” EIR Volume XX, indicates that 10 Intersections-Peak Hour [*sic*] periods impacted by the proposed project are already at LOS “F” while 31 will be at LOS “F” after the proposed project and mitigation. Therefore, the infrastructure “cannot accommodate the traffic generated.” This violates the Venice Community Plan, Policy 16-2.1, which states that, “No increase in density shall be effected by zone change or subdivision unless it is determined that the transportation infrastructure serving the property can accommodate the traffic generated.”

4. **REQUEST FOR RESPONSE:** Does the City agree that a violation exists? If not, please explain why and how the City will be able to honestly make a finding of infrastructure adequacy? If the City agrees that a violation exists, please explain how the DEIR addresses this violation in accordance with CEQA and other applicable laws.

Response 6-22

The Draft EIR provides an analysis of the Proposed Project's impacts in relationship to the City of Los Angeles General Plan in Subsection 3.4.1.14 of Section IV.G, Land Use. The analysis addresses impacts in relation to the policies of the General Plan Framework, the Westchester-Playa del Rey Community Plan in which the Proposed Project is located, and the Area D Specific Plan which implements the General Plan policies at the Proposed Project site. For the reasons presented within that section, the analysis concludes that impacts regarding the Plan Policies would be less than significant.

While the Proposed Project is not in the Venice Community Plan, the Proposed Project is not inconsistent with, nor does it violate the goals referenced in the comment.

The Proposed Project would not cause 31 intersections currently operating at LOS D to operate at worse levels. The Proposed Project mitigates all of the Proposed Project's traffic impacts to a level of insignificance. Projected increases in levels of service are primarily caused by the increase in ambient conditions, rather than by the Proposed Project.

The purpose of the Draft EIR is to provide decision-makers with relevant information concerning the Proposed Project's impacts. This information includes traffic impact and volumes created by area-wide growth as well as traffic impacts caused by the Proposed Project.

Please See Topical Response TR-6, Relationship with Community Policies, on page 460. Also, please see Response 6-18, above. The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 6-23

D. THE DEIR FAILS TO ASSESS IMPACTS TO COASTAL PARKING AND OTHER COASTAL RESOURCES.

COMMENT: The DEIR does not assess impacts to the beach parking impact zone at Venice Beach or Playa del Rey. As clearly one of the attractions of this proposed project site is its proximity to the beaches, beach parking and shuttle bus service will be impacted. The California Coastal Act requires that "All public agencies carrying out or supporting activities outside the coastal zone shall consider the effect of such actions on Coastal Zone resources."

1. REQUEST FOR RESPONSE: As many of mitigations proposed will be carried out or supported by public agencies, the DEIR examine [*sic*] the impact on beach parking or any other potential impacts to Coastal Zone resources. Please analyze the impacts to beach parking in Playa del Rey and Venice and the impacts to the beach shuttle bus service and provide feasible mitigation measures as appropriate.

Response 6-23

The Playa Vista First Phase Project will provide a weekend beach shuttle to Venice Beach. The Proposed Project will provide a separate demand-responsive shuttle to the Marina del Rey area. Both of these services will provide another option to Playa Vista residents and guests. Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 893 provides a summary description of this service. There would be no significant impacts to the existing Venice beach shuttle service since that shuttle currently does not provide service to the Proposed Project site, and is not planned to provide service to the site in the future.

The weekend beach shuttle to Venice Beach provided by the Playa Vista First Phase Project will reduce parking demand associated with beach-goers from the First Phase Project, as well as the Proposed Project. The demand-responsive shuttle to the Marina del Rey area provided by the Proposed Project will further reduce such parking demand.

By bringing patrons from the Proposed Project to the Marina and area beaches via shuttle rather than automobiles, the mitigation program for the project will mitigate the project's impact on the beach and coastal resources.

Comment 6-24**E. LINCOLN CORRIDOR TASK FORCE REPORT PROPOSALS MAY NOT BE COMPATIBLE WITH DEIR MITIGATION MEASURES.**

COMMENT: The suggestions listed in the Report by the Lincoln Corridor Task Force are not adequately addressed in the DEIR.

1. REQUEST FOR RESPONSE: The DEIR must consider each of the alternatives suggested by the Task Force and examine the impact Playa Vista's generated trips will have under the various scenarios.

Response 6-24

The Lincoln Corridor Task Force (LCTF) is an ongoing multi-jurisdictional entity that is seeking to develop a mutually agreeable transportation improvement plan for Lincoln Boulevard between Manchester Avenue and the I-10 freeway. This plan may include an array of capacity-enhancing measures, transit enhancement strategies and improved corridor aesthetics. With implementation of the mitigation program discussed in the Draft EIR and in Section II.15, Corrections and Additions, of the Final EIR on page 216, the Proposed Project would not have any significant traffic impacts. Nevertheless, as discussed on page 7 of Appendix K-1 of the Draft EIR, in the event the Lincoln Corridor Task Force adopts a set of regionally superior traffic improvements that are equivalent or superior in mitigating the project-related traffic impacts of the Proposed Project, prior to implementation of the Proposed Project or its mitigation measures the City may

require the Proposed Project to contribute toward the implementation of the Task Force's improvements in an amount not greater than the Project improvements being superceded.

Comment 6-25

F. THE DEIR FAILS TO ADDRESS WHETHER CONDITIONS IMPOSED ON THE PHASE ONE PROJECT HAVE BEEN COMPLIED WITH.

COMMENT: In order to determine whether the impact analysis is accurate, the DEIR must provide information about the level of compliance with Phase One mitigation measures and conditions of approval. If some conditions have not been complied with, the various calculations contained in the DEIR must reflect this reality.

1. REQUEST FOR RESPONSE: Please list which Phase One project conditions have been complied with and which conditions have not been complied with.

Response 6-25

Mitigation measures associated with the adjacent First Phase Project were addressed in a separate EIR (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510), certified by the City of Los Angeles in September, 1993, and Mitigated Negative Declaration/Addendum to the EIR, certified by the City of Los Angeles in December, 1995. Completion of mitigation measures adopted in the certification of these documents is proceeding according to the Mitigation Monitoring and Reporting Programs adopted in conjunction with them. As provided for in the First Phase EIR, traffic-related mitigation measures are implemented in accordance with a subphasing plan approved by LADOT.

Comment 6-26

COMMENT: Building and Safety is unable to enforce conditions except during business hours Monday through Friday. What will be the mechanism after hours M-F and on weekends to enforce conditions? For example, during such times, if wind reaches 15 mph or higher and construction and grading are not halted, who can one call and how long will it take force compliance?

Response 6-26

The monitoring and enforcement of mitigation measures related to development of the Proposed Project would be no different than for any other project in the City. The proposed Mitigation Monitoring and Reporting Program for the Proposed Project is located in Appendix Section III of the Final EIR. The MMRP provides an enforcement agency for each mitigation measure. In addition, the public may lodge an inquiry or a complaint with the Council Office, and/or appropriate responsible agencies. The City of Los Angeles has the authority to issue a Notice of

Violation for rule violations or stop work order for facilities or developments within its jurisdiction, and any alleged violations would be investigated for an appropriate action.

As an example, SCAQMD Rule 403 regulates anthropogenic (i.e., man-made) fugitive dust sources by requiring actions to prevent, reduce or mitigate fugitive dust emissions. The Proposed Project would be required to comply with the provisions of Rule 403, and would be subject to periodic inspection and oversight by SCAQMD personnel. In addition, under Los Angeles Municipal Code Section 91.104.2.4, whenever any construction work is being done contrary to the provisions of any law or ordinance enforced by the building department, the building department has the authority to issue a written notice to the responsible party to stop work on that portion of the work on which the violation has occurred. If a stop work order is issued, then no work shall be done on that portion of the property, as set forth in the notice, until the violation has been rectified and approval obtained from the department.

Comment 6-27

G. THE DEIR FAILS TO ANALYZE HEALTH-RELATED IMPACTS RESULTING FROM INCREASED TRAFFIC AT IMPACTED INTERSECTIONS AND ROADS WHERE SENSITIVE RECEPTORS ARE LOCATED

1. REQUEST FOR RESPONSE: How will the air children breathe at Broadway Elementary, at the schools on Walgrove and at Venice High School and other area schools be affected by the increased traffic? Will pollution and emission levels rise? How many increased incidences of asthma and other respiratory ailments might occur? Please address cumulative impacts, including ALL related projects.

A list of sensitive receptors located in Venice that must be analyzed are attached as Appendix B.

Response 6-27

The Proposed Project is not anticipated to have a localized significant impact at any of the sensitive receptors identified in Venice (i.e., identified in Appendix B of this comment) based on the analysis provided in Subsection 3.4.2.3 of Section IV.B, Air Quality, of the Draft EIR. This subsection provides an in depth analysis of potential localized operational impacts related to the Project buildout traffic as well as cumulative traffic. For example, intersections near the receptors with high Project traffic volumes and poor levels of service (i.e., greatest change in an intersection's volume-to-capacity due to Project generated traffic) were evaluated in the Draft EIR to assess the potential for local carbon monoxide concentrations to exceed national or state thresholds. Since significant impacts would not occur at the intersections with the highest traffic volumes that are located adjacent to sensitive receptors, it was concluded in the Draft EIR that no significant impacts would be anticipated to occur at any other locations in the study area as the conditions yielding CO hotspots would not be worse than those occurring at the analyzed intersections. Consequently, the sensitive receptors that were included in this analysis would not be significantly affected by CO emissions generated by the net increase in traffic which would occur under the proposed Project and cumulative condition. Therefore, as the receptors with the

highest potential for pollutant concentrations would not result in a significant impact, it was concluded in the Draft EIR that no significant impacts are anticipated to occur at any other locations in the study area, such as the community of Venice.

The potential impacts to air quality from the Proposed Project were analyzed in conformance with the SCAQMD's recommended approach for assessing air toxics. In addition, the SCAQMD's comment letter to the Draft EIR commends the lead agency for voluntarily including a localized air quality analysis consistent with the localized significance threshold methodology adopted by the SCAQMD's Governing Board at its October 3, 2003 public hearing. Under the SCAQMD methodology, the impacts of the Proposed Project on both regional and local air quality are considered. Moreover, if a project would not result in a localized air toxics impacts, then regional air toxics impacts similarly would be less than significant.

Please Refer to Subsection 3.4.2 of Section IV.B. Air Quality, of the Draft EIR for a detailed discussion of the Project's operational impacts.

Comment 6-28

H. THE DEIR FAILS TO CONSIDER IMPACTS ON VENICE AREA SCHOOLS AS A RESULT OF THE PROJECT'S ADDITIONAL SCHOOL-AGED CHILDREN

COMMENT: The DEIR does not discuss the impacts to Venice elementary and secondary schools resulting from the increase of Playa Vista's school aged children.

1. REQUEST FOR RESPONSE: Since LAUSD has rejected the school site offered by Playa Vista due to toxic contamination throughout the Playa Vista site, the DEIR should analyze how many school children are likely to use Venice area schools for their education, and whether this would constitute a significant impact.

Response 6-28

Section IV.L. (3), Schools, of the Draft EIR on page 997 analyzes the Project's potential impacts on public schools. The Los Angeles Unified School District (LAUSD) has established attendance boundaries for each of its schools. Based on information provided by the LAUSD, the Project site is currently located within the attendance boundaries of Playa del Rey Elementary School, Marina del Rey Middle School and Venice High School. These are the schools that would accommodate the Proposed Project's school age children, notwithstanding inter-District transfers. While inter-District transfers are possible, they account for a very small percentage of the students attending any particular school. As such, schools other than the three noted above are not anticipated to be needed to accommodate the public school students generated by the Proposed Project.

The Draft EIR schools analysis considers Proposed Project impacts both with and without the availability of a school located within the Playa Vista site. For the purposes of the Draft EIR, it

was assumed that the Playa Vista school would be an elementary school (i.e., K-5 facility) and that only that portion of the school's capacity that would not be used by the Playa Vista First Phase Project would be available to the Proposed Project.

Based on the analysis presented in Table 144 on page 1013 of the Draft EIR, Proposed Project development would result in a significant impact with regard to capacity at Playa del Rey Elementary School, with or without the Playa Vista school, and a less than significant impact on school capacity at Marina del Rey Middle School and Venice High School (i.e., forecasted capacity exists to accommodate the students generated by the Proposed Project). With the addition of portable classrooms at Playa del Rey Elementary School, sufficient capacity would be available to accommodate the elementary school children generated by the Proposed Project. However, when viewed on a cumulative basis (See Subsection 6.0 of Section IV.L.(3), Schools, of the Draft EIR on page 1016), insufficient capacity is available at all three schools to accommodate the school children generated on a cumulative basis. Notwithstanding, pursuant to the provisions of Senate Bill 50 (SB 50), Project cumulative impacts on school facilities are reduced to a less than significant level with the payment of new school construction fees pursuant to California Government Code Section 65995.

Furthermore, as of this date, the LAUSD has not declined a school site at Playa Vista. As stated in their letter dated March 20, 2002, (included in the Final EIR Appendices) the Los Angeles Unified School District "has taken no action regarding the school site" at Playa Vista, discussions between the school district and Playa Vista "are on-going," and the district expects "a successful solution to meeting the school needs for the Playa Vista development will be reached in a timely and cooperative manner."

Comment 6-29

Section 3: Standing Conservation Committee Report

ALTERNATIVES

- Alternative No. 1 "No Project" is preferred by the Conservation Committee because there will be no adverse impacts from the proposed project on the Community of Venice. The proposed benefits of short-term construction jobs and housing are not a sufficient trade off for adverse impacts that would be felt on the health and well being of Venice community members.

Response 6-29

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 6-30

CUMULITIVITY [*sic*]

• The DEIR fails to consider significant cumulative impacts from extant major, minor, and other approved un-built projects in the sub region in combination with the project on:

1. Existing Transit Capacity
2. Emergency Fire and Police Services
3. Schools and Libraries
4. Water Resource Impacts

COMMENT: THE DEIR MUST CONSIDER THE CUMULATIVE [*sic*] ADVERSE IMPACTS FROM ALL EXTANT MAJOR, MINOR, AND APPROVED UNBUILT PROJECTS IN THE SUB REGION IN COMBINATION WITH PROPOSED PROJECT.

Response 6-30

The Draft EIR provides cumulative analyses for all of the environmental topics addressed in Sections IV.A through IV.P.(3) of the Draft EIR. Cumulative analyses for the topics mentioned are included as Subsection 6.0 in Sections IV.K.(1), Traffic and Circulation, IV.L.(1), Fire Protection, IV.(L).2, Police Protection, IV.L.(3), Schools, IV.L.(5), Libraries, and IV.C, Water Resources, respectively. All of these analyses are based on the related projects list that is provided in Table 5 on page 195, and illustrated on Figure 11 on page 194. These analyses are based on methodologies described in each section, per the CEQA Guidelines.

Please See Topical Response TR-3, Related Projects, on page 453, for a discussion on the issue of Related Projects and their cumulative effects.

Comment 6-31

AIR QUALITY

• Unavoidable Adverse Impacts will result from certain construction activities that will exceed SCAQMD regional significance thresholds. These unavoidable adverse impacts will affect the health of stakeholders in Venice.

COMMENT—THE DEIR SHOULD NOT UTILIZE OVERRIDING CONSIDERATIONS TO FACILITATE A PROJECT THAT WILL INCREASE AIR POLLUTION AFFECTING THE HEALTH AND WELL BEING OF PEOPLE IN THE COMMUNITY OF VENICE.

Response 6-31

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Construction related daily regional emissions from both direct and indirect sources exceed the significance thresholds for CO, NO_x, and ROC. Thus, emissions of these pollutants would result in a significant regional air quality impact during the Proposed Project's construction phase. In addition, an in depth analysis of potential localized construction impacts related to the project was provided in Subsection 3.4.1.2 of Section IV.B., Air Quality, of the Draft EIR. As discussed in the subsection, sensitive land use receptors in the vicinity of the Proposed Project site and the Proposed Project's proposed off-site roadway improvements were included in the air dispersion modeling analysis to determine localized pollutant concentrations. Specifically, the local construction impacts from construction operations focused on NO₂, CO, and PM₁₀ emissions and their impact on 19 nearby sensitive receptors, including schools, hospitals, rest homes, day-care centers, and at sampling of locations throughout the residential areas adjacent to the Proposed Project site. These receptors were selected based on their location and proximity to the Proposed Project site and the six off-site roadway improvements. Results of the dispersion modeling indicated that none of the receptors would be significantly impacted based on the SCAQMD's *Localized Significance Threshold Methodology*. Therefore, as the receptors with the highest potential for pollutant concentrations would not result in a significant impact, it was concluded in the Draft EIR that no significant impacts are anticipated to occur at any other locations in the study area, such as the community of Venice. In addition, the SCAQMD's comment letter to the Draft EIR commends the lead agency for voluntarily including a localized air quality analysis consistent with the localized significance threshold methodology adopted by the SCAQMD's Governing Board at its October 3, 2003 public hearing.

Comment 6-32

TRANSIT INFRASTRUCTURE

- The DEIR fails to state exactly all and what transit improvements will be made to accommodate the project needs. The project only hopes that fees paid to transit funds will somehow assure adequate transit mitigations in the future. This leap of faith does not identify or protect Venice from the unknown adverse significant effects the proposed project will have on Venice community members. The adverse effects of traffic on neighborhood streets in Venice has been omitted from the DEIR.

COMMENT—ALL NECESSARY IMPROVEMENTS FOR TRANSIT INFRASTRUCTURE REQUIRED BY THE PROJECT MUST BE IDENTIFIED AND CONSTRUCTED PRIOR TO FINAL APPROVAL OF THE PROPOSED PROJECT AND INCLUDED IN THE DEIR. THE DEIR MUST CONSIDER THE ADVERSE EFFECTS OF PROJECT-GENERATED TRAFFIC ON NEIGHBORHOOD STREETS IN VENICE.

Response 6-32

The Proposed Project will purchase buses and pay operating fees to Culver City Bus. Additional details regarding the Transit Improvement Program are provided in the Draft EIR. Please See Subsection 4.0 of Section IV.K.(1) Traffic and Circulation, beginning on page 887 for a

discussion of the proposed mitigation measures. Specific details of individual components are provided in the Appendix K-3 of the Draft EIR, on page V-1.

In addition, the Draft EIR considers traffic impacts on neighborhood streets and this analysis includes the Venice community. Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 872, presents an analysis of potential neighborhood impacts that could be caused by project traffic. This analysis includes the Venice community. As discussed in Subsection 3.4.7, the Proposed Project will not result in any significant impacts on neighborhood traffic in the Venice area. Additional details of this analysis can be found in Appendix K-2, Traffic Study Appendix Volume 1D, and Topical Response TR-5, Neighborhood Traffic Impacts, on page 458.

Finally, the improvements for transit infrastructure would be implemented in accordance with the subphasing plan described in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 891. (A revised Subphasing Plan is included in Section II.15, Corrections and Additions, of the Final EIR, and is also included as Attachment E to the Project's MMRP.) These improvements are intended to mitigate the Proposed Project's impacts, and thus would only be required if the Proposed Project were approved. Thus, they would not be required to be implemented prior to approval of the Proposed Project. The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 6-33

GREENHOUSE GAS EMISSIONS AND SEA LEVEL

- Venice is a low-lying coastal community that may be affected by global warming and the associated rise of sea level. The project fails to address the effects of large new volumes of greenhouse gasses the project will emit into the atmosphere and the subsequent adverse impacts on sea level as they relate to the community of Venice.

COMMENT—THE DEIR MUST CONSIDER THE ADVERSE EFFECTS ON THE RISE OF SEA LEVEL CAUSED BY THE PROPOSED INTRODUCTION OF NEW VOLUMES OF GREENHOUSE GASSES THAT WILL BE EMITTED INTO THE ATMOSPHERE BY THE PROJECT.

Response 6-33

The impacts of the Proposed Project on air quality were assessed using the methodology set forth in the SCAQMD CEQA Air Quality Handbook, which is the accepted methodology for development projects in the City (See Section IV.B., Air Quality, of the Draft EIR).

Comment 6-34

WATER POLLUTION

- Runoff from the project will cause further pollution of the Ballona Wetlands and the Pacific Ocean.

COMMENT—THE DEIR MUST CONSIDER ALL EFFECTS OF THE PROPOSED PROJECT ON THE HEALTH OF THOSE PEOPLE UTILIZING THE PACIFIC OCEAN TO SWIM AND FISH IN THE LOCAL AREA.

Response 6-34

As stated in Subsection 4.0 of Section IV.C.(1), Hydrology, and Section IV.C.(2), Water Quality, of the Draft EIR on pages 394 and 517, respectively, potential pollutant increases from the Proposed Project area would be addressed through the implementation of mitigation measures. The mitigation measures, including completion, or otherwise guaranteed completion, of the Freshwater Marsh, Riparian Corridor and other structural/treatment control BMPs, would improve existing flood control infrastructure with water quality enhancements that would result in no increase in pollutant loads or concentrations to the Ballona Wetlands, the Ballona Channel, or Santa Monica Bay compared with pre-First Phase conditions as stated in Section IV.C.(2), Water Quality, Subsections 3.4.1.2.6 on page 485, Subsection 3.4.1.2.5 on page 478, and Subsection 3.4.1.2.4 on page 476, of the Draft EIR. Moreover, as discussed in Subsection 3.4.1 of Section IV.C.(2), Water Quality, of the Draft EIR, flows from the Proposed Project would not cause pollution, contamination or nuisance in the receiving waters and would not violate any applicable regulatory standards in the Ballona Wetlands, the Ballona Channel or Santa Monica Bay. Thus, it is not anticipated that the Proposed Project would have an impact on water quality that would adversely affect swimming and fishing in the Pacific Ocean.

Impacts on human health are further discussed in Section IV.I, Safety/Risk of Upset, of the Draft EIR and impacts on biotic resources are further discussed in Section IV.D, Biotic Resources, of the Draft EIR.

Comment 6-35

SEISMIC ACTIVITY

- The DEIR fails to acknowledge that the site has been subject to ongoing seismic activity that is higher than normal for Southern California. Evidence of this activity is shown on the Continental Margin Earthquake Epicenter Maps compiled by the U.S. Geological Survey and the California Department of Conservation. Further evidence of this heightened level of risk is also documented at the Southern California Earthquake Data Center website. www.data.scec.org

COMMENT—THE DEIR MUST CONSIDER HISTORIC EARTHQUAKE INFORMATION SHOWN ON THE CALIFORNIA DEPARTMENT OF CONSERVATION CONTINENTAL [sic] MARGIN EARTHQUAKE EPICENTER MAPS AND THE SOUTHERN CALIFORNIA EARTHQUAKE DATA CENTER WEBSITE AT www.data.scec.org. TO DETERMINE IF THE PROJECT WOULD CAUSE AND OR ACCELERATE HAZARDS WHICH WOULD

**RESULT IN SUBSTANTIAL DAMAGE TO STRUCTURES AND INFRASTRUCTURE,
AND EXPOSE PEOPLE TO SUBSTANTIAL RISK OF INJURY.****Response 6-35**

In Subsection 2.2 of Section IV.A, Earth, of the Draft EIR on page 207, historic earthquake information relevant to the Proposed Project site is provided. Inasmuch as historic earthquake and fault data presented in the Draft EIR are used to identify and designate seismic hazard zones (e.g., Alquist-Priolo Special Study Zones, Fault Rupture Study Areas), the seismic risks associated with the Proposed Project site have been considered in the Draft EIR analysis. Such data are the basis for assessing hazards to people and structures from seismic activity, and based on this data, the State Geologist has not included any portion of the Proposed Project site or immediate vicinity in an Alquist-Priolo Special Study Zone or Fault Rupture Study Area.

The earthquake data provided at the Southern California Earthquake Center (SCEC) website (<http://www.data.scec.org>) summarizes, and graphically illustrates, the historic seismic events in the Southern California region, including recent fault activity. Such data and graphic depictions do not illustrate a notably higher level of seismic activity in the vicinity of the Proposed Project site. To the contrary, the vast majority of earthquake activity in Southern California is indicated to have occurred (more recently) along the San Andreas Fault zone and in coastal San Luis Obispo county, and historic larger seismic events have occurred at distances greater than 10 kilometers from the Proposed Project site. As such, as discussed in the Draft EIR, the Proposed Project site is at no greater risk from seismic groundshaking impacts than other areas in the region. In fact, as supported by the data on the SCEC website, the propensity for sizeable earthquake activity in proximity to the Proposed Project site appears to be substantially less than that for other areas in the Los Angeles metropolitan area (e.g., San Fernando and San Gabriel Valleys and high desert communities).

Additionally, design and construction of the Proposed Project would be carried out in accordance with the applicable standards of the Uniform Building Code and requirements of the City Department of Building and Safety, thereby minimizing the potential for adverse effects to people or structures at the Proposed Project site as a result of seismic events. Therefore, as indicated in the Draft EIR, the Proposed Project would not cause or accelerate hazards which would result in substantial damage to structures and infrastructure, and expose people to substantial risk of injury.

Comment 6-36

- The DEIR fails to consider all known active faults that could cause earthquake damage, tsunami, or seiche. The DEIR must consider all nearby active offshore faults that could cause earthquake damage, tsunami, or seiche. These active faults are shown on the California Department of Conservation Mines and Geology Continental Margin Fault Maps. Further evidence of potential damage to the project by tsunami or seiche can be found at a website maintained by the National Oceanic and Atmospheric Administration titled Tsunami Research [sic] Program at <http://www.pmel.noaa.gov/tsunami/> and the USC Tsunami research group

website at <http://www.usc.edu/dept/tsunamis/video/calvid/index.html> and the National Tsunami Hazard Mitigation Program website at <http://www.pmel.noaa.gov/tsunami-hazard/>

- Furthermore, the DEIR fails to consider that on or off shore earthquakes can cause submarine canyon slumping resulting in local tsunamigenic events. Some local submarine canyons subject to such events are the Santa Monica and the Redondo Canyons.

COMMENT—THE DEIR MUST CONSIDER THE POTENTIAL ADVERSE EFFECTS FROM ACTIVE LOCAL SUBMARINE FAULTS CAUSING EARTHQUAKES, TSUNAMI, SEICHE, AND SUBMARINE CANYON SLUMPING LEADING TO LOCAL TUSNAMIGENIC [*sic*] EVENTS. THE DEIR MUST EXAMINE THE EXTANT INFORMATION PROVIDED AT A WEBSITE MAINTAINED BY THE NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION TITLED TSUNAMI RESEARCH PROGRAM LOCATED <http://www.pmel.noaa.gov/tsunami/> and the USC TSUNAMI RESEARCH GROUP WEBSITE AT <http://www.usc.edu/dept/tsunamis/video/calvid/index.html> AND THE NATIONAL TSUNAMI HAZARD MITIGATION PROGRAM WEBSITE <http://www.pmel.noaa.gov/tsunami-hazard/> TO DETERMINE IF THE PROJECT WOULD CAUSE AND/OR ACCELEARATE [*sic*] HAZARDS WHICH WOULD RESULT IN SUBSTANTIAL DAMAGE TO STRUCTURES AND INFRASTRUCTURE, AND EXPOSE PEOPLE TO SUBSTANTIAL RISK OF INJURY.

Response 6-36

As indicated in Response 6-35, earthquake and fault data, including data pertaining to off-shore faults, are considered by the State Geologist in the assessment of earthquake hazards. Tables 6 and 7 on pages 221 and 222, respectively, and Figure 17 on page 223, of Section IV.A, Earth, of the Draft EIR include data for and address impacts from offshore seismic faults.

The information and data provided at the websites indicated by the commentator, while supportive of the existence of seismic hazards in the region, do not present any substantive new information relative to the impacts of the Proposed Project. These websites outline current ongoing efforts to characterize and study tsunami events and associated hazards, but do not disclose any conclusions suggesting that the analysis of tsunami hazards, as presented in the Draft EIR, is in any way inadequate. Although there exists the potential that submarine faults could cause tsunami events, both from seafloor motion and from submarine canyon slumping (undersea landslides), the impacts to coastal areas have been addressed in the Los Angeles County Interim Emergency Response Plan for Tsunami Operations. Irrespective of the cause, this plan sets forth procedures to minimize potential adverse impacts to life and property in the event of a tsunami. As discussed in Subsection 2.1.2 of Section IV.A, Earth, of the Draft EIR on page 206, implementation of the provisions and procedures in the County's tsunami emergency operations plan would address the potential of significant adverse impacts to people or structures in the event of a tsunami. Accordingly, as indicated in the Draft EIR, the Proposed Project would not cause or accelerate hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

Comment 6-37

- The DEIR fails to consider whether local active faults can trigger one another leading to cascading events. Information regarding this topic not considered in the DEIR is reflected on the United States Geological Survey website in the form of a press release dated December 8, 2003, at the following address:

http://www.usgs.gov/public/press/public_affairs/press_releases/pr1823m.html

COMMENT—THE DEIR MUST CONSIDER NEW EVIDENCE THAT EARTHQUAKES ON LOCAL ACTIVE FAULTS MAY TRIGGER EARTHQUAKES ON OTHER FAULTS LEADING TO CASCADING EVENTS TO DETERMINE IF THE PROJECT WOULD CAUSE AND OR ACCELEARATE [*sic*] HAZARDS WHICH WOULD RESULT IN SUBSTANTIAL DAMAGE TO STRUCTURES AND INFRASTRUCTURE, AND EXPOSE PEOPLE TO SUBSTANTIAL RISK OF INJURY. THE FOLLOWING UNITED STATES GEOLOGICAL SURVEY WEBSITE SHOWS A PRESSS [*sic*] RELEASE DATED DECEMBER 8, 2003 THAT MUST BE CONSIDERED THE DEIR:

http://www.usgs.gov/public/press/public_affairs/press_releases/pr1823m.html

Response 6-37

The relationship between local active faults and the potential for triggering “cascading” earthquake events has been accounted for in the analysis of seismic hazards in the Draft EIR. The extent to which historical earthquake and fault data illustrate triggering of cascading events is not fully understood. Seismic risks developed by the State Geologist and/or the United States Geological Survey (USGS) focus on the maximum credible earthquakes potentially generated by faults, as well as the surface fault rupture potential along these faults. Regardless of whether the earthquake event is defined as a cascading event or an independent event, the potential for groundshaking and/or fault rupture remains the same for the maximum credible earthquake. The assessment of seismic risks by the State Geologist is adequate to predict the potential for adverse physical impacts to structures and infrastructure, since the cause of seismic events does not predict the associated damage, but rather the events themselves. As discussed in Response No. 6-35, all buildings would be constructed to meet all the requirements of the Uniform Building Code, the LABDS, as appropriate, and mitigation measures. As such, the Proposed Project would not cause or accelerate hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

Comment 6-38

APPENDIX A
GRVNC Stakeholder Letters

Response 6-38

These attachments are presented in Comments 6-39 through 6-62.

Comment 6-39

Subject: Opposition to phase II of Playa Vista.
Date: Tue, 16 Dec 2003 04:05:58 +0000
From: Onda Sly <smallaxe02@hotmail.com>
To: lupc@grvnc.org

Please register my disapproval of the plans for Phase II of Playa Vista.

I don't believe that adequate consideration has been made for the impacts [from] increased traffic to the area caused by the proposed project.

The current situation in the area is already a problem, thanks in part to the approval and construction of phase I.

I also object to the failure of the developer to address the needs of the community, as regards low-income and so-called "affordable" housing.

Please recognize the overwhelming desires of the community and stake-holders, by recommending that the project be denied permits to proceed. Thank-you.

Ian Johnston (stakeholder)

Response 6-39

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. It should be noted that the Proposed Project does not result in the removal of any affordable housing units, or the relocation of any households residing in affordable housing units. As such, development of the Proposed Project would have a less than significant impact on affordable housing.

Comment 6-40

I am concerned about the impact of [*sic*] the Playa Vista Phase II will have on the traffic on Lincoln Blvd from Jefferson to Santa Monica and especially through Venice. This project will bring a huge added burden to an already grid-locked Lincoln Blvd. The added pollution from cars will also impact the quality of air in our area, especially for those of us who live near Lincoln Blvd. Without infrastructure improvements to public transportation and other improvements first, I can not support such and [*sic*] expansion.

Laura Silagi

Response 6-40

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The proposed traffic mitigation measures are identified to mitigate the Proposed Project's significant impacts. These mitigation measures, including the measures along Lincoln Boulevard, are discussed in Subsection 4.0 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 887. After mitigation, the Proposed Project will not have any significant impacts on the Lincoln Boulevard corridor. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue/Jefferson Boulevard identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not result in any significant traffic impacts.

Regarding air quality, as detailed in Subsection 3.4.2.3 of Section IV.B, Air Quality, of the Draft EIR on page 307 and in Section II.4, Corrections and Additions, of the Final EIR, the local effects of Project-related mobile emissions were analyzed at several of the most congested intersections, including those intersections along Lincoln Boulevard, within the Project vicinity. Impacts to local air quality would be less than significant, including locations along Lincoln Boulevard, based on assessment methodology and evaluation criteria adopted by the SCAQMD. Please Refer to Subsection 3.4.2 of Section IV.B, Air Quality, of the Draft EIR for a detailed discussion of regional operational impacts. See also Response 6-31.

Comment 6-41

It is with great trepidation I drive Lincoln and Jefferson Boulevards these days. The amount and density of the construction and the amount of traffic it will generate over time is of great concern to me. I am also greatly concerned about the underground and leaking gas storage tanks that are on site. It is my opinion that continuing the gigantic development in this area is a mistake from the standpoint of resident safety and traffic congestion.

Linda Newton, 825 Dickson St. Marina del Rey, CA 90292

Response 6-41

Traffic impacts are discussed in Section IV.K.(1), Traffic and Circulation, of the Draft EIR and Section II.15, Corrections and Additions, of the Final EIR. As discussed therein, the Draft EIR concludes that all potentially significant traffic impacts associated with the Proposed Project would be mitigated.

No underground gas storage occurs beneath the Project site, and, with the exception of a small number of septic tanks and seepage pits, there are no known underground storage tanks within the Project site. The storage of natural gas near the Proposed Project site is discussed in Section IV.I., Safety/Risk of Upset, of the Draft EIR. As shown in Appendix J-1 of the Draft EIR, and summarized in Subsection 2.2.2.1 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on page 677, 14 Leaking Underground Storage Tank (LUST) Incident Reports were reported on or within 0.25 miles of the Project site. Within the Proposed Project site, records suggest that underground fuel tanks may have existed at or in the vicinity of the former Salvage Yard, the former Remote Test Site and near the existing Building 45. As discussed in Subsection 2.2.3 of Section IV.I, Safety/Risk of Upset, of the Draft EIR starting on page 682, as part of the soil and groundwater assessment and remediation program under the voluntary soil and groundwater remediation program and under Cleanup and Abatement Order (CAO) No. 98-125, investigations were performed for the adjacent Playa Vista First Phase Project and Proposed Project sites. No underground storage tanks were encountered during these investigations. As discussed in Subsection 2.2.3.2.1 of Section IV.I, Safety/Risk of Upset, beginning on page 683 of the Draft EIR, four septic tanks and two seepage pits remain in some areas of the Proposed Project site. These will be removed as necessary during remediation work under CAO No. 98-125 or during construction. As stated throughout Section IV.I, Safety/Risk of Upset, of the Draft EIR, if any contamination is unexpectedly encountered during site development activities, it will be assessed and remediated in accordance with the requirements of CAO No. 98-125.

The remaining comments are noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 6-42

I am writing in regard to the Playa Vista “Village at Playa Vista” environmental impact report. The Village at Playa Vista’s Urban Development Component would occur on an approximately 99.3-acre site and include 2,600 dwelling units, 175,000 square feet (sq.ft.) of office space, 150,000 sq.ft. of retail space, and 40,000 sq.ft. of community-serving uses on a land mass that cannot support it. We have liquefaction soil, natural gas emissions underground and a very fragile ecological wetland in this area. We have overcrowding and too much traffic on Lincoln Boulevard now, I cannot imagine [*sic*] an additional 3,000-6,000 people living in this area.

I don’t believe the proper environmental investigations have taken place prior to this development. I am very much against the “Village at Playa Vista” continuing development.

Mindy Taylor Ross, 214 E. Melnitz Hall, Box 951622, Los Angeles, CA 90095

Response 6-42

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The topics raised in the comment are analyzed in the Draft EIR. Liquefaction is analyzed in Section IV.A, Earth, of the Draft EIR, beginning on page 205. The storage of natural gas near the Proposed Project site and soil gas issues are analyzed in Section IV.I, Safety/Risk of Upset, beginning on page 660. The impact of the Proposed Project on wetlands is analyzed in Section IV.D, Biotic Resources, beginning on page 523, and Section IV.C.(2), Water Quality, beginning on page 400. Finally, the impact of the Proposed Project on traffic is analyzed in Section IV.K.(1), Traffic and Circulation, beginning on page 798.

Comment 6-43

I'm afraid I won't be able to write a real response to the Playa Vista EIR but I will write briefly about the impact of Playa Vista to date.

I think one of the main things that has been disturbing is the deception about how the project would look. It is really ugly with no attempt whatever [*sic*] to mitigate the incredibly dense and blocky buildings with any meaningful, not to mention nice, landscaping. The development is built right out to the street and any elements of the development that might be remotely appealing (lakes and other things I remember them promising) are apparently being hidden away deep in the middle of it all. The buildings are truly ugly and all jammed together along narrow roads—certainly that's all you can see from the main streets driving by. It's like a ghetto plunked down along the wetlands. It's a real slap in the face of the community. When they had their fence up they had painted words like "school" and "wetland garden" and other appealing phrases but all we got was this dump!

Response 6-43

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

An analysis of impacts regarding aesthetics is provided in Subsection 3.4.1.2 of Section IV.O, Visual Qualities, of the Draft EIR, beginning on page 1171. The analysis addresses building heights, building placement and open space, and landscaping, and concludes that impacts on the visual character of the area would be less than significant, because the Proposed Project would not contrast with the visual character of the surrounding development, so as to cause a degradation of the environment.

Comment 6-44

The traffic congestion is already clearly a problem and they haven't even really begun their project in earnest or filled up the units from what I've heard. Widening the street for 1/4 mile along their project doesn't mitigated [*sic*] anything.

This is clearly a major development—and they are making no attempt to hide or mitigate that at all. The auto and other pollution generated by this project will have a huge impact on the whole

city and beyond since sea breezes will blow it all inland. I wonder how many of you have noticed the city's air blowing about it [*sic*] the San Gabriel Valley or Palm Springs and the rest of the Inland Empire... It really is a regional problem and we should start looking at development that way. Conversely the wetlands are [a] regional asset and environmental necessity, not just a benefit for people living near the beach.

Response 6-44

The commentor's statements about "not having begun their project in earnest or filled up the units and widening the street for ¼ mile along their project doesn't mitigate anything" seem to be in reference to the Playa Vista First Phase Project. The Playa Vista First Phase Project is not the subject of this EIR. All of the traffic expected to be generated by the First Phase Project is included in the 2010 baseline conditions in the traffic analysis in Section IV.K(1), Traffic and Circulation, of the Draft EIR. This section provides details of the transportation analysis and mitigation measures. An array of transit improvements, signal system improvements, bicycle improvements and highway/roadway improvements are being proposed as mitigation measures for the Proposed Project. See also Section II.15, Corrections and Additions, of the Final EIR.

Air quality impacts from the Proposed Project are addressed in Section IV.B, Air Quality, of the Draft EIR and in Section II.4, Corrections and Additions, of the Final EIR. Impacts on Biotic Resources are addressed in Section IV.D, Biotic Resources, of the Draft EIR and in Section II.7, Corrections and Additions, of the Final EIR.

Comment 6-45

I'm curious about what kind of traffic mitigation they are promising now. I'm curious about the natural gas issue. I'm curious about the impact on the diverse wildlife which has lived in and used the wetlands for 100s of years—and the meaning for maintaining some semblance of a native coastal ecology. I'm also curious about the promises they made years ago to hire and train local youth for jobs. In general I'm curious about how this mess could come to be—and how people could possibly allow it to grow any further. It seems unbelievable.

Judy Branfman, Venice, CA

Response 6-45

The Draft EIR analyzes the Proposed Project's potential impacts. Proposed traffic mitigation measures are discussed in Subsection 4.0 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 887, and in Section II.15, Corrections and Additions, of the Final EIR. Also see Response 6-42. The storage of natural gas near the Proposed Project site and soil gas issues are discussed in Section IV.I, Safety/Risk of Upset, of the Draft EIR and in Section II.13, Corrections and Additions, of the Final EIR. Impacts on biotic resources are addressed in Section IV.D, Biotic Resources, of the Draft EIR, and in Section II.7, Corrections and Additions, of the Final EIR.

Regarding the comment about “the promises they made years ago to hire and train local youth for jobs”, the Applicant created Playa Vista Job Opportunities and Business Services (PVJOBS), a non-profit organization providing job placement opportunities for at-risk youth and adults. Through PVJOBS, 10 percent of all construction jobs at Playa Vista are set aside for at-risk youth and adults in Los Angeles. PVJOBS works with local job-skills training programs and other community-based organizations to bring qualified individuals into the workplace. As of September 16, 2003, 1,119 positions have been filled at PVJOBS, and an additional 150-200 positions are expected to be filled this year. The Proposed Project would continue the commitment to PVJOBS.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 6-46

Playa Vista Phase II should not be approved. The damage it will cause to the environment cannot be mitigated.

THE WORST LOCATION

Perhaps no location could be worse suited for the Playa Vista Phase II development than the Ballona Gap, “an ancient floodplain.” Lurking directly beneath the surface, scientists conjecture, may be the Compton-Los Alamitos Fault. In addition, according to the Report, “The City of Los Angeles General Plan Safety Element Indicates that the Playa Vista area is subject to potential liquefaction and the Proposed Project site is within an official Liquefaction Zone” (Page 183, Village at Playa Vista: Draft EIR, August 2003).

Response 6-46

As discussed in Subsection 2.2.2.2.1 of Section IV.A, Earth, of the Draft EIR on page 224, the postulated Compton-Los Alamitos Fault may pass beneath the Proposed Project site at a depth of 3 to 6 miles below the ground surface. As discussed in Subsection 2.2.2.2.1, recent geotechnical studies (2000 and 2001) performed by Earth Consultants International and Davis and Namson Consulting Geologists concluded that there is no evidence of surface or shallow subsurface faulting at the Proposed Project site, and, therefore, the potential for surface rupture is considered extremely low (See Appendices D-4 and D-5 of the Draft EIR). Given the depth of this postulated fault, the potential for surface fault rupture hazards to structures or people at the Proposed Project site is considered extremely low. The potential for groundshaking impacts to the Proposed Project in the event of an earthquake along this postulated fault would be no greater than groundshaking impacts from any other local fault. The Draft EIR analysis takes into account the numerous known faults located throughout the Los Angeles region, and not simply those immediate to the Proposed Project site.

Relating to liquefaction hazards at the Proposed Project site, as discussed in Subsection 3.4.1.3 of Section IV.A, Earth, of the Draft EIR on page 256, there exists a limited or moderate liquefaction potential, based on geotechnical investigations completed at the Proposed Project site. Nonetheless, the City Department of Building and Safety requires site-specific geotechnical investigations, including liquefaction assessments, for issuance of building permits for individual structures. As a result, where necessary, the building structures are specifically designed to account for the potential occurrence of liquefaction. Therefore, impacts to the Proposed Project from on-site liquefaction are considered less than significant.

Comment 6-47

The Report also acknowledges that the proposed project is in an area of poor air quality, with elevated air pollution levels, but draws no negative conclusions about adding a development that will dump additional large amounts of pollutants into our air.

Response 6-47

The Draft EIR provides a detailed discussion of unavoidable adverse impacts before and after the imposition of mitigation measures in Subsections 4.0 and 5.0 of Section IV.B., Air Quality, of the Draft EIR. Specifically, the Draft EIR concludes that after implementation of all feasible mitigation measures, Project construction, inclusive of the Equivalency Program and the proposed off-site improvements, would generate CO, NO_x, and ROC emissions that exceed SCAQMD regional significance thresholds for construction activities. Therefore, regional emissions from both on- and off-site (e.g., delivery trucks) construction sources would have a temporary but significant and unavoidable adverse impact on regional air quality. During the Project's operational phase, the Project, inclusive of the Equivalency Program, would result in emission levels that exceed SCAQMD significance thresholds for CO, NO_x, PM₁₀, and ROC. Mitigation measures would reduce the potential air quality impacts of the Project, inclusive of the Equivalency Program, to the degree technically feasible, but emissions would remain above SCAQMD significance thresholds. Therefore, Project operations, inclusive of the Equivalency Program, would have a significant and unavoidable adverse impact on regional air quality. Accordingly, a statement of overriding considerations would be required for Project approval.

Comment 6-48

The Report also glosses over the amount of water pollution that the project will produce and that will detrimentally affect the Santa Monica Bay as well as the Bellflower Aquitard, Ballona Aquifer, and the Silverado Aquifer which lie beneath the project site. The state of California has already given an "impaired" rating to the Bay, Ballona Creek Estuary, and Ballona Wetlands.

Response 6-48

As stated in Subsection 4.0 of Section IV.C.(1), Hydrology, and Section IV.C.(2), Water Quality, of the Draft EIR on pages 394 and 517, respectively, potential pollutant increases from

the Proposed Project area would be addressed through the implementation of mitigation measures. The mitigation measures, including completion, or otherwise guaranteed completion, of the Freshwater Marsh, Riparian Corridor and other structural/treatment control BMPs, would improve existing flood control infrastructure with water quality enhancements that would result in no increase in pollutant loads or concentrations to the Ballona Wetlands, the Ballona Channel, or Santa Monica Bay compared with pre-First Phase conditions as stated in Section IV.C.(2), Water Quality, Subsections 3.4.1.2.6 on page 485, Subsection 3.4.1.2.5 on page 478, and Subsection 3.4.1.2.4 on page 476, of the Draft EIR. Moreover, as discussed in Subsection 3.4.1 of Section IV.C(2), Water Quality, of the Draft EIR, flows from the Proposed Project would not cause pollution, contamination or nuisance in the receiving waters and would not violate any applicable regulatory standards in the Ballona Wetlands, the Ballona Channel or Santa Monica Bay.

Comment 6-49

The most immediate visible impact of the project, should it go forward, will be to traffic congestion. The Report acknowledges what residents of the area already know, that many of the intersections are at present near gridlock. Lincoln Blvd. is a prime example of a street that is already over capacity for much of the day. Even streets that have better ratings, such as Abbot Kinney Blvd., are chocked [*sic*] with commuter traffic. An honest appraisal of the traffic impact of Playa Vista II will show that the project would have a devastating impact on westside streets and freeways. Such an independent study should be conducted without delay, in order to allow a realistic evaluation of this project.

Response 6-49

A comprehensive analysis of the Proposed Project's traffic impacts is provided in Section IV.K.(1), Traffic and Circulation, of the Draft EIR. Please See Topical Response TR-1, Playa Vista Transportation Model, on page 445, for a discussion of the transportation model and analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue/Jefferson Boulevard identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not result in any significant traffic impacts.

Comment 6-50

Playa Vista lies close to California's fragile coastline. Even without this project, the coast is besieged by irresponsible developers who neglect any thought of the impact of their developments on the precious environmental resources that are our legacy to future generations. It is important that the coast be protected from such irresponsible projects such as Playa Vista, not just for those who live nearby, but for all Californians. In the past, the coast has served as a

relatively pollution-free area to which residents of the inner city could escape. Playa Vista, and similar if smaller developments, is changing that dynamic. The coast is becoming clogged with traffic, mini-malls and cookie-cutter development projects who's [*sic*] sole purpose is making profits for their developers.

Response 6-50

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 6-51

SUSTAINABLE DEVELOPMENT

It is time that the state of California and local governments approve only sustainable developments and say no to irresponsible developments that destroy our future. We should also adopt a holistic approach to development that demands that regional solutions to problems such as traffic and pollution be addressed as part of the approval—or disapproval—process, in addition to more local concerns such as zoning. This is the essence of “planning,” which the EIR attempts to downplay or ignore.

If reducing traffic and pollution along the coast are not part of the discussion about Playa Vista Phase II, there cannot be a claim that there really is a planning process. Instead, we are simply allowing random development. We should say as much.

In sum, the coastal area should be a mixture of human activity and nature. Public space should be at least as important as private development. Green space, in the form of large and small parks, wetlands, undeveloped bluffs and nature preserves should be given consideration in all development decisions. Playa Vista I, with its closely packed buildings, indicates that the developers do not understand this concept, regardless of their public relations campaign.

Response 6-51

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Playa Vista Project has been the subject of a long and complex planning process. The scale of the Project has been reduced substantially, with over 70 percent of the former Master Plan now preserved as open space.

A comprehensive traffic impact evaluation study has been performed, including coordination with numerous jurisdictions, during the study process. The traffic impact analysis is provided in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. This study is included along with all the technical analysis in Appendix K of the Draft EIR. The Draft EIR

includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue/Jefferson Boulevard identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not result in any significant traffic impacts.

The Proposed Project has incorporated numerous sustainability concepts. For example, the Project provides a balance of residential, commercial, and retail uses that are all located within walking distance of at least one of a dozen parks. In addition, the freshwater marsh within the Playa Vista First Phase Project and riparian corridor was designed for natural storm water planning. The Proposed Project will incorporate the same features that were used in the Playa Vista First Phase Project that has been recognized as a model project for sustainable urban development. The overall Playa Vista project has also been recognized as one of five P.A.T.H. (Partnership for Advancing Technology in Housing, established by former President Clinton) communities in the United States and has also received the Ahwahnee Award from the California Local Government Commission's Center for Livable Communities.

Comment 6-52

HOUSING

At the same time, the coast should not be a playground just for the wealthy. Affordable housing and strong rent control should be a part of any environmental analysis. The level and percentage of affordability requirements at Playa Vista and other coastal developments should be in proportion to income levels in the metropolitan area. Anything less will continue the trend toward the coast becoming enclave for the well-to-do. In this regard, Playa Vista Phase II is part of this problem. Real affordable housing, as well as cooperative housing ownership, should be considerations that are incorporated into Playa Vista Phase II and other development projects.

Response 6-52

The Proposed Project does not result in the removal of any affordable housing units, or the relocation of any households residing in affordable housing units. As such, development of the Proposed Project would have a less than significant impact on affordable housing.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 6-53

The first step to sustainable development along our coast should be a moratorium on all new construction that worsens the current traffic and pollution problems. Rail transit along major coastal corridors, such as Lincoln and Sepulveda Blvds., and to and from the coast from inland areas are the kinds of development projects we should be considering. When mass transit is in place that is capable of handling the majority of trips, increased density will be possible, particularly along these transit corridors. Meanwhile, a moratorium would ensure that mass transit rail lines are built sooner, rather than later. In addition, bike and pedestrian-only zones in some of our coastal cities, including Venice, are the kind of “zoning” possibilities we should be considering.

Response 6-53

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 6-54**THE SOCIAL COSTS OF PLAYA VISTA II**

The only aspect of the Playa Vista project that is private is the massive profit that will be reaped by the developers. Meanwhile, the social costs of the project will be left to the taxpayers, beginning with millions of dollars in roadway “improvements” required to accommodate Playa Vista traffic.

Other social costs include public health expenses due to increased incidents of emphysema, other heart and lung diseases and cancer engendered by increased pollution, as well as mental health problems worsened by road rage and frustration with overcrowded streets. Pedestrian and bicyclist casualties are sure to increase because of increased auto usage. And in the long run, the public will be saddled with massive repair of ecological damage caused by constructing this project in the delicate Ballona Gap.

While the developers of Playa Vista may claim that their property rights allow them to go forward with this project, they are wrong. In crowded urban areas, individual property rights must be used in socially productive ways, and with the agreement of the community. To advocate unrestricted, or barely restricted, property rights is like advocating the free speech right to yell “fire” in a crowded theater. We all live in crowd [sic] theaters, called the Los Angeles basin and the California coast. The Playa Vista Phase II project will cause irreparable harm to our crowded theaters, and must be denied if we are to have a sustainable legacy to hand down to our children and grandchildren.

Jim Smith, 533 Rialto Ave., Venice, CA 90291

Response 6-54

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. Air quality, traffic and biotic resources impacts from the Proposed Project are addressed in Section IV.B., Air Quality, Section IV.K.(1), Traffic and Circulation, and Section IV.D., Biotic Resources, of the Draft EIR.

Comment 6-55

I work at Loyola Marymount University and am a life-long resident of Venice. I am very concerned about the impacts that the Playa Vista development is having on my community.

Anyone using Lincoln Bl should tell you that it is completely insane to add anymore traffic to the existing grid-lock, but all Playa Vista housing developments are gigantic buildings which will have mostly multiple car families living in them.

Wildlife has been effectively destroyed or removed by the new existing development, like the raccoons and red-tail hawks that inhabited [sic] the area already developed:

The raccoons that moved up the bluff in to the campus of Loyola were captured and most likely destroyed.

I have recently seen raccoons moving in and out of Venice sewers and climbing the telephone poles on Washington Bl.

A large tree on Jefferson, used for many generations by breeding red-tail hawks, was simply cut down.

Peggy Lee Kennedy

Response 6-55

Traffic and biotic resources impacts from the Proposed Project are addressed in Section IV.K.(1), Traffic and Circulation, and Section IV.D., Biotic Resources, of the Draft EIR.

It is unclear to which tree removal the commentor refers. It is assumed the commentor refers to the removal of eucalyptus trees next to Jefferson Boulevard in February 2002. The removal of eucalyptus trees does not require the preparation of an environmental impact report. At the time of the removal, several of the eucalyptus trees were diseased and threatened the safety of travelers along Jefferson Boulevard. One of the trees had fallen and posed a traffic safety hazard to drivers along Jefferson Boulevard. Based upon numerous site visits, biologists determined there were no nesting birds at the time of the removal.

The biological baseline for the Proposed Project is addressed in Topical Response TR-11, Grading, Erosion Control and Vegetation Maintenance Activity In The Project Area, on page 474, above.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 6-56

[I] am submitting my comments regarding the project.

With the wetlands being the sacred space of ancient burial grounds, the idea to build more condos and shops not only seems unbelievable but outright dangerous.

[I] steadfastly oppose the construction. Increased traffic and pollution are the obvious reasons, however, [I] also believe that with LA being the most park poor city in the nation and maybe even the world, we should preserve the sacred land and use it as an environmental treasure. [I]f we do not, mother nature has ways of taking matters into her own hands. [I] hope she sends a [*sic*] more than a few personal messages to the developers and the government officials that have pushed this along. [Y]ou go, girl!

theresahulme@earthlink.net

Response 6-56

Impacts from the Proposed Project on Biotic Resources, Archaeological Resources, Traffic, Air Quality, and Parks are discussed in Sections IV.D, Biotic Resources; IV.P.(2), Archaeological Resources; IV.K.(1), Traffic and Circulation; IV.B, Air Quality; and IV.L.(4), Parks and Recreation, of the Draft EIR.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 6-57

On the subject of cumulative traffic impacts:

The cumulative impact of the Playa Vista Project is inadequately portrayed in the EIR, because the proposed project for Lincoln Place is not considered as part of the cumulative impact. Nor is the Lincoln Center project, the Trammell Crowe [*sic*] project, the Walgreen's project, or any other project proposed for Venice. Lincoln Place's role in the cumulative impact is explained here as an example.

When the Draft EIR was written in 1993 for the proposed demolition and redevelopment of Lincoln Place, the traffic impacts were miscalculated as follows:

Since the project was requesting a density bonus of 50 units over and above the 800 units to be replaced, the impacts were assumed to be only the result of the 50 added units, or about an 8% increase. The traffic analysis did not take into account the changing demographics that were built into the proposed project. That is, the seniors and low-income people who were to be displaced by the proposed project, and who own no cars, bring the average number of cars owned by Lincoln Place residents down to about one car per household. By contrast, the proposed redevelopment was designed for households with 2½ cars per household. This change, plus the density bonus, would result in an increase of about 150% in addition to the 8% projected by the EIR for the additional 50 units. This translates into as many as 1,000 to 2,000 additional car trips per day. This is an example of the way an EIR can fail to disclose the actual impact of project.

In addition to this miscalculation, in the intervening ten years since the Lincoln Place EIR was written, the owners have evicted many tenants, demolished 100 units, and refused to re-rent vacancies. Therefore, the 700 units which remain standing are only a little over half occupied. Lincoln Place will either be restored as originally designed (since Lincoln Place has been determined by the State of California Historic Resources Commission to be eligible for the National Register of Historic Places), or it will be redeveloped. In either scenario, the additional traffic impacts from Lincoln Place will be significant and must be considered in the analysis of cumulative impact. The impacts of other projects proposed for Venice, including but not limited to the Lincoln Center project, the Trammell-Crowe project, and the Walgreens project, should also be considered.

Sheila Bernard, President, Lincoln Place Tenants Association

Response 6-57

Please See Topical Response TR-3, Related Projects, for a discussion on the effects of related projects and how they are incorporated in the Village at Playa Vista Traffic Analysis. See also Response 6-6-12 for a discussion of related projects including the projects identified in this Comment.

Comment 6-58

It is difficult to hold back disagreements and anger after soooo [*sic*] many years of opposition to PV.

Although we were promised that the DEIR for Phase II would not be published before Phase I was completed... yet here are 1,500 pages of detailed jungle to stumble through at year's end—indeed, what's the big hurry????!

All obvious protests, like traffic congestion and air pollution, will arrive on your desk in piles, and no mitigation will change our resolve.

Here in Venice, we know that thousands of newcomers would enjoy the beach areas, if only there were shuttles provided by the ‘owners,’ for instance, and no taxes were spent on additional ‘public’ transport.

Here in Venice, we already smell the crawling traffic on Lincoln Blvd... and this is supposed to be the West Coast’s last, all inclusive, beach city with public access! Already a shifting dream... If more mega-boxes and homes were to rise in our Ballona Wetlands, plenty of ‘dreams’ would be doused, killed, and that goes for the spirit of our neighborhoods as well. Why continue to live here?

Whatever you can do, dear Councilwoman, please DO DO IT!

Our Grassroots Venice Neighborhood Council’s LUPC will join other surrounding NCs in your district in their PV opposition.

Please DO voice the deeply felt and researched concerns of your constituents!

Please DON’T allow that falsely calculated population increase over the next couple of decades for you to succumb to pressure and burning greed and a dozen LA neighborhoods’s [*sic*] seriously impaired quality of life!

Your serious and honest consideration is truly appreciated.

Ingrid Mueller, 1027 Elkgrove Avenue, Venice, CA 90291 310-392-3791

Response 6-58

Impacts from the Proposed Project on traffic and air quality are analyzed in Section IV.K.(1), Traffic and Circulation, and Section IV.B, Air Quality, of the Draft EIR.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 6-59

The following are my comments regarding Playa Vista:

- I do not believe any project with an [*sic*] DEIR of 15,000 pages can be made safe... nor do I believe that anyone can read and properly assess the information contained within a 1,500 page report. As we know, “the devil is in the details.”
- I do not believe that these monumental safety problems can be ‘Mitigated.’

- I do not believe that anything that needs to be “mitigated” should be approved.
- [T]his project is in a known liquifaction zone with gas seeps.
- [T]his project will destroy bluffs and archeological sites of native people’s burial areas.
- What has been built already is too big. We must stop overdevelopment right now as we are now at gridlock.

Carol V. Beck

Response 6-59

The Draft EIR analyzes the Proposed Project's potential impacts. The topics raised in the comment are analyzed in the Draft EIR. Liquefaction is analyzed in Section IV.A, Earth, of the Draft EIR beginning on page 205. The storage of natural gas near the Proposed Project site and soil gas are analyzed in Section IV.I, Safety/Risk of Upset. The bluffs are analyzed in Section IV.D, Biotic Resources. Archaeological resources are analyzed in Section IV.P, Archaeological Resources, beginning on page 1199. Traffic is analyzed in Section IV.K.(1), Traffic and Circulation, beginning on page 798. Corrections and Additions for these sections are contained in Sections II.2, II.13, II.7, II.29, and II.15, respectively, of the Final EIR.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 6-60

Please do everything in your powers to stop Phase II of Playa Vista. Yes—Los Angeles needs more housing, but it needs more AFFORDABLE housing, not expensive condos and inflated-rental apartments that A) make the new dwellers there feel guilty that they’re conspiring in deteriorating/destroying one of the city of Los Angeles’ few remaining natural habitats, and B) Playa Vista is lowering the quality of life both for nearby residents in Playa Vista and Marina Del Rey AS WELL AS other Angelenos who have to bear the visual eye sore that is Playa Vista on a regular basis.

Please stand up for the people of the city—you don’t need support/allegiance of the builders—they need to be sent a message that they’re corrupting and tarnishing our land and our community, and by voting and speaking out against further development, you will be doing your part to send that message.

Thank you very much for listening and for doing what you can to put an end to any further Playa Vista development and destruction of the Ballona Wetlands/our natural habitats and resources.

Michael Shaw, Venice, CA

Response 6-60

As discussed in Section IV.J, Population, Housing and Employment, of the Draft EIR, the Proposed Project is anticipated to provide a range of housing types and sizes at corresponding cost levels.

Impacts on the habitats of the Proposed Project site are analyzed in Section IV.D, Biotic Resources of the Draft EIR.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 6-61

This was a late-arriving comment that belongs after page 25.

I have labeled it P. 25a.

Thanks for your good work.

Response 6-61

The comment provides background on the letter submittal. Specific comments regarding the review of the Draft EIR and responses follow.

Comment 6-62

I am against any more development at Playa Vista. I live in Venice and am concerned about increased air & noise pollution, traffic and the impact on the environment. Please consider what this is going to do to the people already living in this commu[nity]. Please reconsider expanding the development.

Wendy Winston, 1063 Indiana Ave., Venice, CA 90291 310-396-5981

Response 6-62

The Draft EIR analyzes the Proposed Project's potential impacts to the environment. The topics raised in the comment are analyzed in the Draft EIR. Air quality is addressed in Section IV.B, Air Quality, beginning on page 270. Noise is addressed in Section IV.E, Noise, beginning on page 553. Traffic congestion is addressed in Subsection IV.K.(1), Traffic and Circulation, beginning on page 798. The impacts of the Proposed Project on biological resources are analyzed in Section IV.D, Biotic Resources.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 6-63

APPENDIX B
LIST OF SENSITIVE RECEPTORS

WORKING LIST OF SENSITIVE RECEPTOR IN VENICE

CHILD CARE

Mercado Home Day Care
2428 Walnut Avenue, Venice, CA 90291
Phone: (310) 574-3239

Penmar Recreation Center Child Care
Department of Recreation and Parks, City of Los Angeles
1341 Lake Street, Venice, CA 90291
Phone: (310) 202-4527

PRESCHOOL

Delta Sigma Theta Head Start
1020 Victoria Avenue, Venice, CA 90291
Phone: (310) 1397-2659

Delta Sigma Theta Head Start
625 Vernon Avenue, Venice, CA 90291
Phone: (310) 392-5955

First Lutheran School
815 Venice Blvd, Venice, CA 90291
Phone: (310) 823-9367

First Years Preschool
1010 Amoroso Place, Venice, CA 90291
Phone: (310) 399-3120

Las Doradas Children Center
804 Broadway Street, Venice, CA 90291
Phone: (310) 450-0327

Morning Glory Preschool

2552 Lincoln Blvd, Venice, CA 90291
Phone: (310) 827-0502

St. Joseph Center
204 Hampton
Venice, CA 90291

Susan Sims Bodenstein Preschool
201 Hampton Drive, Venice, CA 90291
Phone: (310) 396-7733

Westminster Avenue Children's Center
(LA Schools—Child Development Division)
Principal: Jacqueline Williams
1010 Main Street, Venice, CA 90291
Phone: (310) 392-4581

ELEMENTARY, MIDDLE AND HIGH SCHOOLS

Broadway Elementary School (K-5)
(LA Unified School District Cluster #14—Venice High School)
Principal: Edwin Romotsky
1015 Lincoln Blvd, Venice, CA 90291
Phone: (310) 392-4944
Ethnicity (fall 1998): 1% Asian, 12% Black, 87% Hispanic

Coeur D'Alene Elementary School (K-5)
(LA Unified School District Cluster #14—Venice High School)
Principal: Beth Ojeda
810 Coeur D'Alene Avenue, Venice, CA 90291
Phone: (310) 821-7813
Ethnicity (fall 1998): 4% American Indian/Alaska Native, 5% Asian, 17% Black, 2% Filipino, 42% Hispanic, 1% Pacific Islander, 29% White

First Lutheran School (K-8)
(Private School)
Principal: David Rusch
815 Venice Blvd, Venice, CA 90291
Phone: (310) 823-9367

Saint Marks Elementary School (PK-8)
(Catholic School)
Principal: Martha Mears
912 Cour [sic] D'Alene Avenue, Venice, CA 90291
Phone: (310) 821-8812

Westminster Avenue Computer Science/Math Magnet School (1-5)

(LA Unified School District Cluster #14—Venice High School)

1010 Abbot Kinney Blvd, Venice, CA 90291

Phone: (310) 392-3041

Ethnicity (fall 1998): 5% Asian, 18% Black, 1 % Filipino, 58% Hispanic, 18% White

Westminster Avenue Elementary School (K-5)

(LA Unified School District Cluster #14—Venice High School)

Principal: Betty Coleman

1010 Abbot Kinney Blvd, Venice, CA 90291

Phone: (310) 392-3041

Ethnicity (fall 1998): 1% American Indian/Alaska Native, 1% Asian, 34% Black, 1% Filipino, 61% Hispanic, 2% White

Westminster School (PK-5)

(Private School)

Principal: Betty Coleman

1010 Abbot Kinney Blvd, Venice, CA 90291

Phone: (310) 392-3041

Mark Twain Middle School

2224 Walgrove Ave, (90066)

Venice High School

13000 Venice Blvd, Los Angeles 90066

SCHOOLS OUTSIDE VENICE ATTENDED BY VENETIANS:

University High School

11800 Texas Ave, Los Angeles 90025

Richland Avenue Elementary School

11562 Richland Ave, (90064)

Beethoven Street Elementary School

3711 Beethoven St. (90066)

Mar Vista Elementary School

11020 Clover Ave. (90064)

Webster (Daniel) Middle School (1954)

11330 W Graham Place 90064

Culver Christian School

11312 Washington Blvd. (90066)

Culver City SDA School
11828 Washington Blvd. (90066)

Saint Gerard Majella School
4451 Inglewood Blvd. (90066)

Wildwood School
12201 Washington Place (90066)

Windward School (Grades 7-12)
11350 Palm Blvd. (90066)

Grand View Boulevard Elementary School
3951 Grandview Blvd, (90066)

ADULT SCHOOL:

Venice Skills Center
(LA Schools—Adult Division)
Principal: Cynthia Moore
611 Fifth Avenue, Venice, CA 90291
Phone: (310) 392-4153

HOSPITAL:

Daniel Freeman Marina Hospital
4650 Lincoln Blvd, Marina del Rey, CA 90292
Phone: (310) 823-8911

SENIOR CENTERS:

Israel Levin Senior Adult Center
201 Ocean Front Walk
Venice, CA 90291

Westminster Senior Citizen Center
1234 Pacific Avenue
Venice, CA 90291

Response 6-63

This attachment was submitted in support of comments stated in Comments 6-12 through 6-28. As such, comments related to this attachment are addressed in Responses 6-12 through 6-28.