City of Los Angeles

Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan (CTCSP/WLA TIMP) - Specific Plans Amendment Project

Brentwood-Pacific Palisades, LAX, Palms-Mar Vista-Del Rey, Venice, Westchester-Playa Del Rey, West Los Angeles, and Westwood Community Plan areas

Final Environmental Impact Report

LA City EIR No. ENV-2014-1458-EIR
CPC Nos. CPC-2014-1456-SP & CPC-2014-1457-SP
State Clearinghouse No. 2014051070

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CHAPTER 1
INTRODUCTION

This Final Environmental Impact Report (EIR) has been prepared to comply with the requirements of California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq. and the guidelines promulgated in connection therewith at Title 14 Code of California Regulation (CCR) Section 15000 et seq. (the "CEQA Guidelines"), specifically Sections 15088, 15089, and 15132. A Final EIR is defined by Section 15132 of the State CEQA Guidelines as "containing the information contained in the Draft EIR; comments, either in verbatim or in summary received in the review process; a list of persons commenting; and the responses of the Lead Agency to the comments received." As such, this Final EIR incorporates by reference the entire Draft EIR.

1.1 Background

Notwithstanding the City's decision to prepare an EIR for informational purposes, this Project is statutorily exempt pursuant to Public Resources Code Section 21080(b)(8), which provides exemptions for the following activities:

> The establishment, modification, structuring, restructuring, or approval of rates, tolls, fares, or other charges by public agencies which the public agency finds are for the purpose of …(D) obtaining funds for capital projects necessary to maintain service within existing service areas…. The public agency shall incorporate written findings in the record of any proceeding in which an exemption under this paragraph is claimed setting forth with specificity the basis for the claim of exemption.

As this project includes modifying an existing fee which is used for capital projects (for transportation mitigation) to maintain service within an existing service area (the WLA TIMP and CTC Specific Plan boundaries are not changed by the Proposed Project), this fee update is exempt under PRC Section 21080(b)(8).

The Proposed Project seeks to improve transportation infrastructure on the Westside of the City given projected growth through the year 2035. As described in Section 4.6, *Transportation,* of the Draft EIR (pages 4.6-69 to 4.6-80), the multimodal transportation improvements identified by the Proposed Project are necessary to minimize the increase in vehicle miles traveled (VMT) that would otherwise be anticipated to occur on the Westside. Section 4.6 of the Draft EIR also describes the benefits of the Proposed Project and provides the quantitative analysis necessary to determine that the Proposed Project would help to maintain transportation service on the Westside by minimizing increases in vehicle trips, minimizing increases in vehicle miles traveled, and shifting the mode-split towards non-auto-centric modes.

Furthermore, the Proposed Project would implement the City's General Plan Framework Element which directly calls for planning for transportation infrastructure investment that may accommodate anticipated growth. The proposed CTCSP and WLA TIMP consider current land use trends and infrastructure needs and provide mechanisms for funding transportation improvements that would mitigate the impacts of new development by increasing mobility options within the Westside.

1.2 Intended Use of the Final EIR

The Final EIR allows the public and the decision makers the opportunity to review comments received on the Draft EIR and responses to those comments, and other components of the EIR, such as the Mitigation Monitoring Program, prior to approval of the project. The Final EIR serves as the environmental document to support approval of the Proposed Project, either in whole or in part.

After completing the Final EIR, and before approving the project, the Lead Agency must make the following three certifications as required by Section 15090 of the State CEQA Guidelines:

- That the Final EIR has been completed in compliance with CEQA;
- That the Final EIR was presented to the decision-making body of the Lead Agency, and that the decision-making body reviewed and considered the information contained in the Final EIR prior to approving the project; and
- That the Final EIR reflects the Lead Agency's independent judgment and analysis.

This Final EIR was prepared at the direction and under the supervision of the City of Los Angeles Department of City Planning (DCP) and Department of Transportation (LADOT). This Final EIR is required under State CEQA Guidelines Section 15132 to include the Draft EIR; comments and recommendations received on the Draft EIR (either verbatim or in summary); a list of persons, organizations, and public agencies who commented on the Draft EIR; responses to significant environmental points raised in those comments; and other relevant information added by the lead agency.

This Final EIR is organized in the following chapters:

- **Chapter 1 – Introduction:** This chapter includes an overview of the Proposed Project, a summary of the project's potential environmental impacts, and a summary of the alternatives considered.
- **Chapter 2 – Comments and Responses:** This chapter contains all comments received by the City of Los Angeles on the Draft EIR during the public review period, which began on January 7, 2016 and ended on March 7, 2016. A list of public agencies, organizations, and individuals who submitted comments on the Draft EIR is provided. Responses to comments received on the Draft EIR have been prepared and are included in this chapter of this Final EIR. Two master responses are provided to address common topics in a comprehensive manner. These master responses are followed by all of the comment letters and transcripts, (marked to identify specific comments), followed by the City's written response to each comment.
- **Chapter 3 – Mitigation Monitoring Program**: This chapter provides the Mitigation Monitoring Program, prepared pursuant to Section 15097 of the State CEQA Guidelines. The Mitigation Monitoring Program (MMP) includes a list of all mitigation measures for the project and identifies the timing associated with, and entity responsible for, implementing each mitigation measure in a table format.

This document, along with the Draft EIR (incorporated by reference), make up the Final EIR.

1.3 Summary of the Proposed Project

The Proposed Project consists of amendments to the CTCSP and WLA TIMP. The amendments include an update to the list of transportation improvements and mitigation measures to be funded, in part, by the impact fees collected from new development; an update to the Transportation Impact Assessment (TIA) fee program, including revisions to the fees, trip generation rates, exemptions, in-lieu credits, and affordable housing credits; and a new transit-oriented development (TOD) credit. The Proposed Project's updated project lists include the following categories of transportation improvements: transit, bicycle and pedestrian, roadway & intelligent transportation system (ITS), and trip reduction programs. Other proposed changes include administrative amendments and minor revisions that are consistent with recent California State legislation, transportation policies in the City's General Plan Elements, and LADOT's Traffic Study Policies and Procedures, and are in line with current best planning practices.

The CTCSP and WLA TIMP were adopted in 1985 and 1997, respectively, with the purpose of establishing a TIA program to be assessed on new development and intended to assist in the implementation of future transportation improvements on the Westside. The TIA fees were established by Specific Plan ordinances and have been a part of the development approval process in the Westside since adoption.

1.3.1 Specific Plan Amendments to Impact Fee Assessment and Methodology

The Proposed Project would revise the TIA fees required under each Specific Plan and corresponding ordinance. To determine the appropriate fee updates, a study was conducted to establish the nexus between new development that occurs in the study area and the need for new and expanded transportation facilities and programs, which include transit, bicycle and pedestrian oriented improvements in addition to the more traditional roadway and signalization improvements. After establishing the nexus, the study calculated the TIA fees to be levied for each type of land use. The amount of the TIA fees is based on each land use's proportionate use of the transportation facilities in total. These updated fees have been incorporated into the proposed amendments to the Specific Plans.

The traditional approach to nexus studies has more often than not involved using automobile Level of Service (LOS) as a performance measure for the transportation system. As part of the proposed amendments to the CTCSP and WLA TIMP, alternative performance measures, such as VMT, person capacity and throughput, travel time, and accessibility have been used to gauge the effectiveness of the proposed mobility improvements. For this study, the nexus for the TIA fee updates is established using VMT per capita as a performance measure. The intent of this fee is to fund improvements for multiple modes of travel, such as motor vehicles, pedestrians, bicycles, and transit. Under the Proposed Project, the trip generation rates are proposed to be incorporated into the TIA fee tables for each Specific Plan area based on the nexus study.

The proposed amendments would also modify current TIA fee exemptions. In each Specific Plan area, some land uses, such as schools, residential uses, and local serving uses, are currently exempt from paying the TIA fee. The proposed CTCSP and WLA TIMP amendments would remove the exemption for single-family and multi-family residential development, with the exception of affordable housing units. In addition, local serving uses, the first 30,000 square feet of shopping centers (currently exempt in the WLA TIMP), and freestanding commercial or medical office projects of less than 20,000 square feet (currently exempt in the CTCSP), would no longer be exempt from an impact fee. Amendments would also be made relative to in-lieu credits, affordable housing credits, and

transit-oriented development credits. Details of these amendments are provided in Chapter 3, *Project Description*, of the Draft EIR.

1.3.2 Specific Plan Amendments to the List of Transportation Improvements

The proposed amendments include updating the list of transportation improvements funded in part by the TIA fees in each Specific Plan area. The new projects, identified through an analysis of completed projects and a public outreach component of the WMP process (including consultation with neighboring jurisdictions, Metro, and the California Department of Transportation [Caltrans]), are aimed at improving the existing transportation network, enhancing system capacity, reducing vehicle trips and VMT, and improving transit connectivity. For purposes of the EIR analysis, the transportation improvements proposed for inclusion in the CTCSP and WLA TIMP amendments are assumed to be implemented by 2035. The Proposed Project's updated project lists includes the following categories of transportation improvements: transit, bicycle and pedestrian, roadway & ITS, and trip reduction programs.

1.3.3 Summary of Environmental Impacts

As identified in Chapter 4, *Environmental Impacts*, and Section 5.4, *Significant Environmental Effects that Cannot be Avoided if the Proposed Project is Implemented*, of the Draft EIR, implementation of the Proposed Project would result in the following significant and unavoidable impacts:

- **Air Quality:**
  - Localized construction impacts (localized and temporary) from construction of transportation improvements
    - Exceedance of standards for localized emissions of inhalable particulate matter with diameter of ten microns or less (PM10) and fine particulate matter with diameter of 2.5 microns or less (PM2.5) by the Lincoln Boulevard Bridge Enhancement, and PM10 by the Lincoln Boulevard and Sepulveda Boulevard Bus Rapid Transit (BRTs) and the Interstate-1 (I-10) Ramp Reconfiguration at Bundy Drive
    - Cumulative localized construction-related pollutant emissions impacts (PM10 and PM2.5)
    - Toxic air contaminant emissions from the Lincoln Boulevard Bridge Enhancement, Lincoln Boulevard and Sepulveda Boulevard BRTs, and I-10 Ramp Reconfiguration at Bundy Drive
- **Noise and Vibration:**
  - Construction impacts (localized and temporary) from construction of transportation improvements
    - Exceedance of established noise standards
    - Temporary or periodic increases in ambient noise levels
    - Human annoyance from groundborne vibration

        - Cumulative impacts from exceedance of established noise standards and groundborne vibrations

    - Operational impacts (permanent) from curb-running bus operations
        - Exceedance of established noise standards
        - Permanent increase in ambient noise levels
        - Cumulative impacts from exceedance of noise standards and permanent increase in ambient noise levels

- **Transportation:**
    - Construction impacts (localized and temporary) from construction of transportation improvements
        - Traffic impacts
        - Cumulative traffic impacts
    - Operational impacts (permanent)
        - Circulation system from vehicle traffic (based on current thresholds)
        - Neighborhood traffic intrusion
        - Congestion Management Program (CMP) and state freeway segments
        - Cumulative impacts related to vehicular traffic, neighborhood traffic intrusion, and CMP freeway segments

All other impacts were determined to be less than significant, or less than significant with implementation of mitigation.

1.3.4 Alternatives to the Project

CEQA requires that an EIR describe a range of reasonable alternatives to a proposed project that could feasibly avoid or lessen any significant environmental impacts, while attaining the basic objectives of the project. The alternatives analyzed in the EIR are:

- **Alternative 1 – No Project**

  Section 15126.6(e) of the State CEQA Guidelines requires evaluation of the No Project Alternative. As described in the State CEQA Guidelines, the purpose of describing and analyzing the No Project Alternative is to allow decision makers to compare the impacts of approving the Proposed Project with the impacts of not approving the Proposed Project. Therefore, as required by the State CEQA Guidelines, the No Project Alternative consists of conditions that might be expected to occur in the foreseeable future if the Proposed Project was not approved.

The No Project Alternative assumes continued implementation of current CTC and WLA TIMP Specific Plans, with continuation of current fees (with annual adjustments) and implementation of existing project lists. Under the No Project Alternative, select roadway widenings and intersection improvements would continue to remain on the project lists, and more projects aimed at increasing vehicle capacity in the Westside would be considered for implementation.

- **Alternative 2A – No Sepulveda Boulevard BRT Alternative**

  Under Alternative 2A, the proposed BRT on Sepulveda Boulevard would be eliminated from the CTCSP and WLA TIMP proposed transportation improvement lists. The current lane configuration on Sepulveda Boulevard would be maintained (i.e., no loss of vehicular capacity).

- **Alternative 2B – No Lincoln Boulevard BRT Alternative**

  Under Alternative 2B, the proposed BRT on Lincoln Boulevard would be eliminated from the CTCSP proposed transportation improvement list. The current lane configuration on Lincoln Boulevard would be maintained (i.e., no loss of vehicular capacity).

- **Alternative 3A – Reduced Parking Alternative**

  The Proposed Project assumes that when additional right-of-way for projects (such as BRT and bicycle facilities) is needed, it would be provided through a combination of vehicular capacity reductions (lane conversions) along with on-street parking removal. Under the Reduced Parking Alternative, when additional right-of-way is required, it would be provided solely by removing street parking, with no conversion of vehicle travel lanes. All of the transportation improvements associated with the Proposed Project are included in this alternative; this alternative offers a distinction as to how right-of-way would be utilized in order to implement the proposed transportation improvements.

- **Alternative 3B – Reduced Vehicle Capacity Alternative**

  The Proposed Project assumes that when additional right-of-way for projects (such as BRT and bicycle facilities) is needed, it would be provided through a combination of vehicular capacity reductions (lane conversions) along with on-street parking removal. Under this alternative, when additional right-of-way is required it would be provided solely by converting vehicle travel lanes into transit/bicycle facilities, with no removal of on-street parking. All of the transportation improvements associated with the Proposed Project are included in this alternative; this alternative offers a distinction as to how right-of-way would be utilized for the proposed transportation improvements.

1.4 Noticing and Availability

Pursuant to State CEQA Guidelines Section 15082, a Notice of Preparation (NOP) for the Draft EIR was issued on May 22, 2014 for a 30-day review period, which was later extended for an additional 30 days, closing on July 23, 2014. A total of 32 comment letters were received via mail, electronic mail, and comment forms submitted from the two scoping meetings. Information, data and observations resulting from these letters are included throughout the Draft EIR, where relevant. Two public scoping meetings were held on June 5, and 9, 2014. The purpose of these meetings was to provide early consultation for the public to express their concerns about the Proposed Project, and acquire information and make recommendations on issues to be addressed in the Draft EIR.

The Draft EIR for the Proposed Project was published on January 7, 2016, and was circulated for a 60-day public comment period, which is 15 days longer than the 45 days typically provided for a Draft EIR comment period. Public notice was mailed or emailed to all individuals requesting notice for this EIR, including all parties that commented on the NOP and all Neighborhood Councils in the Plan Area. Public notice was also posted at the office of the Los Angeles County Clerk and was sent to the State Clearinghouse (a division of the Governor's Office of Planning and Research). The Draft EIR public review period provided interested public agencies, groups, and individuals the opportunity to comment on the contents and accuracy of the document. The Draft EIR was also posted online. The public comment period for the Draft EIR ended on March 7, 2016. In addition to written comments received during the 60-day review period, oral comments were taken at two public meetings held on January 21, 2016 and February 2, 2016.

Moreover, the notice for the June 23, 2016 Open House and Public Hearing for the Development Impact Fee Program Update (which consists of updates to the CTCSP and WLA TIMP) was mailed to owners and occupants within the Specific Plan areas, representing approximately 250,000 mailed hearing notices.

The City received 98 written comment letters and emails (including form letters) and oral comments from five commenters at the two public hearings on the Draft EIR during the public review period. A list of commenters is provided in Chapter 2, *Comments and Responses*. Each comment letter received was bracketed to identify unique individual comments within the letter. Each bracketed individual comment is numbered and corresponds to a matching numbered response. Section 2.5 includes the bracketed comment letter followed by the numbered responses.

The Final EIR is available at the following locations:

City Hall
200 North Spring Street
Los Angeles, California 90012

Central Library
630 West 5th Street
Los Angeles, California 90071

West Los Angeles Regional Library
11360 Santa Monica Boulevard
Los Angeles, California 90025

Palms-Rancho Park Branch Library
2920 Overland Avenue
Los Angeles, California 90064

Mar Vista Branch Library
12006 Venice Boulevard
Los Angeles, California 90066

Westchester-Loyola Village Branch
7114 West Manchester Avenue
Los Angeles, California 90045

Additionally, the Final EIR can be downloaded or reviewed via the Internet at the Department of City Planning's website [http://planning.lacity.org/ (click on "Environmental" and then "Final Environmental Impact Reports")]. The Final EIR can be purchased on CD-ROM for $7.50 per copy. Contact Conni Pallini-Tipton, AICP, Senior City Planner, of the City of Los Angeles at (213) 978-1179 or Conni.Pallini-Tipton@lacity.org for purchase.

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CHAPTER 2
COMMENTS AND RESPONSES

2.1 Introduction

According to Section 15132 of the State CEQA Guidelines, the Final EIR shall include comments and recommendations received on the Draft EIR either verbatim or in summary; a list of persons, organizations, and public agencies commenting on the Draft EIR; and responses of the Lead Agency to significant environmental points raised in the comments. In accordance with Section 15088 of the State CEQA Guidelines, the City prepared responses to all comments received on the Draft EIR. As required by the State CEQA Guidelines, the focus of the responses to comments is on the "disposition of significant environmental issues raised." Detailed responses are not required to be provided to comments on the merits of the project or on other topics that do not relate to environmental issues. This chapter of the Final EIR presents the City's written responses to comments received on the Draft EIR. The format for the responses to the Draft EIR comments presents, on a letter-by-letter basis, each comment letter, which is then followed immediately by responses to the comments contained in that letter. A number of comment letters included attachments. The attachments that accompany these comment letters are provided in Appendix A of this Final EIR. For oral comments received at the public hearings, the public hearing transcript is presented, followed by responses to the comments from all commenters contained in that transcript.

The responses to comments consist of both master responses and individual responses. Within the individual comments submitted on the Draft EIR, some of the same issues were raised by multiple commenters, and numerous comments pertained to a general theme that was common to multiple commenters. To respond to these comments, master responses were prepared that provide a single comprehensive discussion of the issue of concern.

All comments will be forwarded to the decision-makers for their consideration in taking action on the project. The responses to comments are intended to provide the City's considered response to each comment and any supporting arguments, statements, opinions, information, data, and/or analysis provided in the commenter's entire correspondence or communication to the City, notwithstanding that such arguments, statements, opinions, information, data and/or analysis may not be provided in the quoted comment.

2.2 Presentation of Comments and Responses

The format of this chapter is to provide written response to comments received on a letter by letter basis. An alphanumeric Identification (ID) Code is used to identify each correspondence submitted to the City of Los Angeles on the Draft EIR. The ID Code consists of a letter prefix followed by sequential numbers. Agencies have an ID Code beginning with the letter A, individuals and organizations have an ID Code beginning with PC, form letters have an ID Code beginning with FL and oral comments made to a Hearing Officer at the two public meetings have an ID Code beginning with PHV for a public hearing held in Venice and PHWLA for the hearing held in West LA. For example, four letters were received from agencies. The four letters are assigned ID Codes A1 through A4. Each individual comment within a letter is then assigned a corresponding sequential number. For example, Letter A1 includes two individual comments, which are designated as Comment A1-1 and Comment A1-2.

2.3 List of Commenters

The City received 98 comment letters and emails (including form letters) and oral comments from five commenters at two public meetings on the Draft EIR during the public review period. A copy of each comment letter and email received is provided in the Final EIR followed by the City's response. Table 2-1 presents a list of those agencies, organizations, and individuals who commented on the Draft EIR, with their corresponding ID Code.

Table 2-1 List of Commenters on the Draft EIR

No.	Name	Organization
A1	Scott Morgan/Director	State of California, Governor's Office of Planning and Research State Clearinghouse and Planning Unit
A2	Alan Lin/Project Coordinator	State of California, Department of Transportation
A3	Elizabeth Carvajal/Transportation Planning Manager	Los Angeles County Metropolitan Transportation Authority
A4	Ryan Gohlich/Assistant Director/ City Planner	City of Beverly Hills
PC1	Joyce Dillard	
PC2	Nicki Carlsen	Alston & Bird, LLP (representing Twentieth Century Fox Film Corporation)
PC3	Dina Glouberman	Beverlywood Homes Association
PC4	Elizabeth A. Pollock	Del Rey Residents Association
PC5	Laura Lake	FIX THE CITY
PC6	Paul Howard	Tagliaferri Howard Architecture
PC7	Terri Tippit	West of Westwood Homeowners Association
PC8	Terri Tippit	Westside Neighborhood Council
PC9	Barbara Broide	Westwood South of Santa Monica Blvd. Homeowners Association
PC10	Alexander Friedman	
PC11	Alexander Friedman	
PC12	Bill Pope	
PC13	Christopher McKinnon	
PC14	Croft Wellwood	
PC15	Jarret King	
PC16	Lorene Ross	
PC17	Paula Barondess	
PC18	Rick Teplitz	
PC19	J. Ross	
PC20	Jonathan Weiss	
PC21	Thomas Hunt	LAUSD Division of Adult & Career Education Venice High School Campus
PC22	J. Ross	Affordable Housing Developer
PC23	Melissa	
PC24	Elizabeth Pollock	Del Rey Residents Association
PC25	David Feuer	

No.	Name	Organization
PC26	Sharon Commins	
PC27	Laura Lake	FIX THE CITY
PC28	Tim Piasky	Building Industry Association of Southern California
FL1	Adam Katz	
FL2	Al Ezekiel	
FL3	Beth Rendeiro	
FL4	Bonnie L. Stout	
FL5	Calvin T. Sumida	
FL6	Ching Mei Hsieh	
FL7	Connie Call	
FL8	David L. Crandall	
FL9	Dennis Dubrow	
FL10	Donald G. Park	
FL11	Donna S. Crandall	
FL12	Dorothy Garven	
FL13	John M. Schwarz	
FL14	Jaime Milstein	
FL15	Franck Roy	
FL16	Gail and Clint Colver	
FL17	Jacy and James Bolden	
FL18	JB Wenner	
FL19	Jerome Avoesty	
FL20	Jessica Lee	
FL21	John Scharff	
FL22	Judy Estes	
FL23	Karly Kazarian	
FL24	Kent Alves	
FL25	Lorene and Robert Goldman	
FL26	Mario Jauregui	
FL27	Marlene Alves	
FL28	Maureen Fimpler	
FL29	Melanie Scharff	
FL30	Milos Ercegovac	
FL31	Nancy Gundlach	
FL32	Rosanne Cunningham	
FL33	Shoshana Milstein	
FL34	Sidney Bass	
FL35	Silva Zeitian	
FL36	Simone LeHaf	

No.	Name	Organization
FL37	Stephen Marsh	
FL38	Steven DePaul	
FL39	Suzanne Borenstein	
FL40	Teri Shoustal	
FL41	Waldo T. Holmes	
FL42	Wayne and Mary Boehie	
FL43	Dorothy Garven	
FL44	Dorothy Anderson	
FL45	Aurora M. Nova-Luna	
FL46	Christine Rosenzweig	
FL47	Hideo Kondo	
FL48	Lawrence and Margaret Toy	
FL49	Richard E. Vamos	
FL50	Jonas Wood	
FL51	David Bolger and Karen Rizner	
FL52	Marie A. Nelson	
FL53	Christopher J. Drohan	
FL54	Joan Murray	
FL55	Tracey Porter	
FL56	Judy Estes	
FL57	Thomas A. Guem	
FL58	Yolanda Martinez	
FL59	Josh Bleibtreu	
FL60	Tiffany von Banck	
FL61	Wing Young	
FL62	Elaine and Steven Miller	
FL63	Liz Mayo	
FL64	S. Kierulff	
FL65	Christina Murray	
FL66	Claudia Phoenix	
PHV1	Alex Alcantar	
PHWLA1	Paul Howard	TH Architecture
PHWLA2	David Feuer	
PHWLA3	Laura Silagi	Venice Community Coalition
PHWLA4	Mindy Taylor Ross	

2.4 Master Responses

2.4.1 Master Response 1: Project Objectives

Multiple comments claim that the Proposed Project does not meet its identified project objectives. Some comments incorrectly cite congestion reduction as an objective of the Proposed Project; other comments claim that the Proposed Project does not meet identified objectives such as reducing VMT and Greenhouse Gas (GHG) emissions. Additionally, some comments offer opinions on how the city should prioritize competing goals/needs and some incorrectly state that the objectives of the Proposed Project and the objectives of Mobility Plan 2035 (MP 2035) are incompatible.

Evolving Urban and Legal Context

Los Angeles, like all urban environments, is in a constant state of gradual evolution. As population grows, as the built environment changes, and as technology advances, the City must find new ways to achieve its many goals, including its goal of improving mobility. The transportation impact fee programs established through the CTCSP and WLA TIMP are just some of the tools used to implement the City's mobility goals. Since the City of Los Angeles adopted its first transportation impact fee program more than three decades ago, the premise of the program has been to implement transportation improvements to alleviate the expected impacts of new development on the circulation system.

Historically, roadway capacity enhancement projects have been used to mitigate congestion and improve LOS; this is the primary approach currently used by the two existing Specific Plans. However, as described in Chapter 6, *Alternatives,* of the Draft EIR, the addition of new right-of-way to the City's street network was determined to be inconsistent with the Mobility Plan 2035 goals and policies regarding the use of existing right-of-way and the reduction of VMT. Furthermore, as discussed under Alternative 1 in Chapter 6 of the Draft EIR, roadway capacity improvements would require acquisition of right-of-way, including the demolition of buildings on parcels adjacent to existing roadways. Acquisition could occur either through development dedications (which would occur gradually over time as parcels are redeveloped) or if the City of Los Angeles were to acquire portions or whole parcels. For the most part, acquired parcels would consist of commercial and retail uses, although some residential uses may also require acquisition. Demolition of commercial and retail uses would be disruptive and would physically alter the makeup of existing communities. In addition, elimination of neighborhood commercial uses could result in residents traveling greater distances to access necessary amenities. Acquisition of private property to enable the roadway widenings would also be very costly. Additionally, research has shown that adding roadway capacity does not reduce congestion, but rather induces more vehicle travel as well as GHG emissions associated with that additional vehicle travel (Handy, 2015).

One of the Council Motions (Council File 07-0287) initiating the Specific Plan updates states that the City should establish new mobility priorities and develop new mobility strategies:

> "Traffic congestion within the Specific Plan boundaries has continued to worsen and new priorities and new strategies need to be developed. A Specific Plan update would include a broad array of approaches…"

In addition to the constraints of the built environment, recent legislation, including SB 375 and SB 743, has shaped the Proposed Project's objectives.

SB 375

California SB 375 was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing and environmental planning. Under the law, the City must conform to a Sustainable Communities Strategy (SCS) that provides a plan for meeting emissions reduction targets set forth by the California Air Resources Board (CARB). This requires transportation plans and their associated fee programs to consider non-vehicular modes of travel, such as transit, biking and walking and the infrastructure needed to make these modes a viable option for those that live and work in the community.

SB 743

SB 743 changes the way cities measure project impacts by encouraging projects to reduce their GHG emissions through measuring VMT versus the current priority of reducing vehicle delay at intersections (LOS) through roadway widening as a mitigation. The State as a whole, and the City of Los Angeles included, is in transition with respect to the focus of transportation planning and traffic impact analysis. In the past the focus has been on vehicular travel with the objective of minimizing vehicle delay wherever possible. In the future, as directed by SB 743, the State, including the City of Los Angeles, will move to a VMT focus, with the objective being to reduce VMT (and therefore GHG) as appropriate. Just as the Mobility Plan 2035 is a long-term plan intended to complement the VMT-focus of future transportation planning and implement the Complete Streets Act, so too is the Proposed Project.

The Proposed Project maintains the original intent of the CTCSP and WLA TIMP to alleviate the expected impacts of new development on the circulation system. However, acknowledging the existing physical constraints of a now built-out urban environment as well as recent State legislation, the Proposed Project considers other transportation impacts and benefits applicable in the assessment of a TIA fee. As described in the Nexus Study (which was included in the Draft EIR as Appendix B), the updated impact fees that are a part of the Proposed Project were developed to mitigate transportation impacts as measured by VMT, rather than LOS. As described by the Governor's Office of Planning and Research (OPR), possible mitigations for VMT include improving or increasing access to transit, improving pedestrian or bicycle networks, providing traffic calming, providing bicycle parking, providing car-sharing, bike sharing, and ride sharing programs, and parking demand management programs (OPR, 2016). The Proposed Project's list of transportation improvements include transit enhancements, active transportation projects, transportation demand management programs, and roadway and ITS projects; these projects are intended to mitigate VMT.

Congestion

Some comments incorrectly cite congestion reduction as an objective of the Proposed Project. The objectives of the Proposed Project are listed on page 3-5 to 3-13 of the Draft EIR; there is not an objective related to reducing congestion. As discussed in the Project Background in Chapter 3, *Project Description,* of the Draft EIR, the Westside of Los Angeles, like many other urban areas throughout the country, experiences significant traffic congestion. Despite an extensive street network, vehicular circulation continues to deteriorate due to historical over-reliance on the car as the primary mode of transportation. The combination of many regional destinations, oversaturated roadways, unreliable travel times for autos and transit, and limited north-south transit options underlie the need for creating a transportation plan for the Westside that will better serve all modes of transportation, improve the connectivity of the overall system, and enhance the livability along major boulevards in Westside communities. Per the State of California Mitigation Fee Act, the development impact fees, like those established by the CTCSP and WLA TIMP, cannot include the cost

attributable to existing deficiencies in public facilities (Government Code Section 66000-66008). Therefore, the Proposed Project cannot be responsible for addressing congestion caused by existing uses. However, the Proposed Project requires that new development pay a fair share towards improving the overall transportation system, thereby mitigating the transportation impacts of new development.

Clarifying Consistency with MP 2035

In the years since the City Council moved to initiate the update process for CTCSP and WLA TIMP, the Council has adopted the Mobility Plan (MP 2035; City of Los Angeles Department of City Planning, 2016), an update to the City's General Plan Circulation Element. Some comments incorrectly state that the objectives of the Proposed Project and the objectives of MP 2035 are incompatible and therefore are inconsistent. Congestion reduction is not a goal of MP 2035 and it is not an objective of the proposed CTCSP and WLA TIMP. As summarized on pages 4.6-5 to 4.6-6 of the Draft EIR, MP 2035 lays the policy foundation for safe, accessible, and enjoyable streets for pedestrians, bicyclists, transit users, and vehicles throughout the City of Los Angeles, including the Westside. MP 2035 provides the framework for future community plans and specific plans, such as the proposed amendments to the CTCSP and WLA TIMP, which take a closer look at the transportation system in specific areas of the City and recommend implementation strategies to realize MP 2035. The types of projects envisioned as part of the updates to the project lists are within the framework established in MP 2035. The proposed updates of the CTCSP and WLA TIMP are consistent with the City's multimodal approach to transportation planning and apply such principles to the Westside in a more targeted manner. The improvements proposed on the updated project lists would provide transportation options and accommodations for multiple modes of travel (i.e., transit, bicycle, pedestrian, and vehicle) as part of the transportation system. The relationship between MP 2035 and the list of transportation improvements proposed in the Proposed Project are discussed in detail on pages 4.6-37 to 4.6-38 of the Draft EIR.

As some commenters note, some conclusions of the CTCSP/WLA TIMP Specific Plans Amendment Project Draft EIR are different from the conclusions reached in the MP 2035 EIR (City of Los Angeles Department of City Planning, 2015). It is important to note that the differences in environmental conclusions have no bearing on the determination of consistency between the Proposed Project and MP 2035. The CTCSP/WLA TIMP Specific Plans Amendment Project and the MP 2035 are two different projects. While both share the same goal of increasing multi-modal transportation opportunities, the nature and extent of the proposed improvements associated with the two projects are different. First, MP 2035 is a citywide plan that would result in transportation-related improvements being located throughout the City of Los Angeles while the Proposed Project is tailored to the Westside. Moreover, while the proposed updates to the project lists reflect the vision of MP 2035, they do not reflect full build-out of MP 2035. Many of the projects contained in the updated project lists provide a first-step in implementing MP 2035. Finally, while both EIRs provide a high level of analysis, the EIR for the Proposed Project provides a finer level of detail through the identification and evaluation of specific transportation improvements. Because there is more definition regarding the location and nature of the proposed transportation improvements, it is easier to ascertain the potential for the proposed improvements to result in impacts to particular environmental resource areas. For an example, see pages 4.2-19 to 4.2-27 of the Draft EIR for discussion of impacts to biological resources from the Lincoln Boulevard Bridge Enhancement, a specific transportation improvement that is defined in more detail as a part of the Proposed Project.

GHG Reduction Targets

As described in Impact 4.3-2 and Impact 4.3-3, the Proposed Project does not impede the attainment of regional GHG emission reduction targets and does not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. AB 32 calls for the reduction of statewide GHG emissions to 1990 levels by 2020. SB 375 gives fundamental support to AB 32 to achieve regional GHG reduction targets through the coordination of transportation and land use planning. The transportation sector is the largest source of GHG and the largest consumer of energy. GHG emissions are closely correlated with VMT. Reducing VMT is therefore an important component of the overall strategy to reduce GHG emissions. Land use policies aimed at shortening the distance between housing, jobs, and services reduce the need to travel long distances on a daily basis and can help reach GHG reduction targets. The Proposed Project provides funding for sustainable transportation improvements that further support the reduction of VMT and GHG emissions. Please also see Responses to Comments PC12-2 and PC12-3 for additional discussion of the State's GHG emission targets.

Balancing the Many Needs of the City

Some comments offer opinions on how the city should prioritize multiple goals/needs. Specifically, multiple commenters state that congestion reduction and cut-through traffic reduction should be prioritized above other City needs such as safety for vulnerable roadway users or transit accessibility. The City is challenged with addressing multiple concerns including congestion; VMT; vehicle emissions (including GHGs); access to jobs, transit, open space and other resources; economic development; health, and other issues. Many of these needs are not mutually exclusive and the City must continually work to find solutions that further its multiple goals and objectives simultaneously. As such, the Proposed Project is part of an integrated approach to addressing multiple factors that must be balanced by decision makers.

The objectives of the Proposed Project are intended to guide decision-making and to be supportive of one another and of other City policies and goals. However, it is important to recognize that goals and policies are sometimes in competition and may entail trade-offs. The singular pursuit of one goal or policy may, in some cases, inhibit the achievement of other goals or policies. For example, BRT along Lincoln Boulevard would provide positive benefits such as a reliable north/south transit option, better connectivity with east/west transit options, and increased transit access. However, even with the implementation of neighborhood protection programs, the potential elimination of some vehicle capacity along Lincoln Boulevard to accommodate the BRT may result in some vehicle diversion onto other north/south corridors and other streets. Thus, when implementing any individual transportation improvement project, decision-makers must strike a balance between competing goals and policies, recognizing that all objectives cannot be fully implemented all the time. In relation to any decision, some goals and policies may be more compelling than others. It is up to the decision-makers to balance and weigh the applicability and merits of the goals and policies on any given project, program, or action. Ultimately, weighing competing City goals and policies, including the Proposed Project's objectives, is part of the analysis that decision makers must undertake in CEQA when determining the feasibility of mitigation measures and alternatives, and ultimately, deciding to adopt a Statement of Overriding Considerations and approve the Proposed Project.

2.4.2 Master Response 2: Effects of Congestion on Air Quality

Several commenters raised concerns regarding the impact that increased congestion would have on air quality and/or climate change. The comments note that congestion would increase and traffic speeds would decrease under the Future With Project scenario as compared to the Future Without Project conditions in 2035. Several of the comments imply that only VMT were used to develop the air pollutant and GHG emissions inventories and by using only VMT, the Draft EIR did not capture the effect that slower speeds and idling associated with increased congestion would have on air emissions.

The assumption that the Draft EIR did not account for air quality impacts associated with congestion is incorrect. The methodology used to develop emission inventories for the Draft EIR included and analyzed the effect of slower speeds under the Future With Project scenario compared to Future Without Project conditions. Specifically, vehicle travel within the study area was analyzed by speed. Future traffic volumes were sorted and reported by 5 mph speed bins (5 mph, 10 mph, 15 mph, etc.) for existing conditions (2014), as well as Future With Project and Future Without Project conditions in 2035, as shown in Table 4.1-14, Daily Vehicle Miles Traveled by Speed in the Project Area, of the Draft EIR. Each speed bin value in the table represents the upper end of the speed bin, meaning that the 5 mph bin represents 0 to 5 mph (which includes idling), the 10 mph bin represents >5 to 10 mph, the 15 mph bin represents >10 to 15 mph, and so on (California Air Resources Board, 2014a).

Table 4.1-14 of the Draft EIR allows daily traffic volumes associated with Existing Conditions, Future Without Project conditions, and Future With Project conditions to be compared. This comparison shows that Future With Project volumes at the lowest two speed bins (5 mph and 10 mph bins) are expected to be greater than those speed bin volumes under the Future Without Project conditions, even though the total traffic volume for Future With Project is expected to be less than the total traffic volume for Future Without Project conditions. This indicates that speeds are expected to generally be lower under the Future With Project condition than the Future Without Project condition.

Vehicles traveling at lower speeds have higher emission rates on a grams-per-mile (g/mile) basis, as noted by the commenters, and as shown in Appendix D of the Draft EIR (All-Inclusive 2014 Emission Factors, g/mile, on page 32 of the appendix; and All-Inclusive 2035 Emission Factors, g/mile, on page 33 of the appendix). These factors were developed from EMFAC2014. As noted in Appendix D, these factors were “all-inclusive” in that they included averages for all fuel types, all vehicle classifications, and all vehicle emission processes, except paved road dust which was calculated separately. The emission processes included engine running, starting, and idling; evaporative emissions from vehicle running, resting diurnal, and hot soak losses; tire wear; and brake wear.

The emissions from daily traffic volumes were calculated for each speed bin using the appropriate speed-specific emission factor for that bin. The resulting emissions for each speed bin were summed across all bins to determine the daily traffic emissions for Existing Conditions, Future Without Project conditions, and Future With Project conditions. These calculations are shown in the Appendix D (2014 Emissions, lbs/day, on page 36 of the appendix; 2035 Emissions Without Project, lbs/day, on page 37 of the appendix; and 2035 Emissions With Project, lbs/day, on page 38 of the appendix). Comparing emissions in the 5 mph and 10 mph speed bins between Future Without Project conditions and Future With Project conditions clearly indicates that the Future With Project emissions associated with vehicles traveling at the lower speed bins would be higher. Nevertheless, total emissions associated with the Future With Project scenario would be lower for all pollutants except NOx than total emissions associated with the Future Without Project scenario. This is due to the lower traffic

volumes in the higher speed bins associated with the Future With Project scenario as compared to the Future Without Project scenario.

A similar comparison can be made between the Future With Project conditions and Existing Conditions emissions. However, improvements in emission factors (in g/mile) between 2014 and 2035 will result in overall lower emissions for all pollutants in the Future With Project condition despite an increase in overall traffic volume between 2014 and 2035. Some commenters have argued that this benefit is not attributable to the Proposed Project and should not be accounted for in the analysis. However, it is standard methodology to assume all future background conditions when analyzing a Future With Project scenario. This includes both future improvements in emission factors, which benefit the analysis of Future With Project conditions, as well as future, unrelated increases in background traffic volumes, which have a negative effect on Future With Project emissions calculations. There is substantial evidence to support the Draft EIR's methodology regarding future conditions. Regional emissions from motor vehicles in the study area were estimated using EMFAC2014 vehicle emission factors. EMFAC2014 is a U.S. Environmental Protection Agency (USEPA)-approved mobile source emission inventory model that represents the CARB current understanding of motor vehicle travel activities and their associated emission levels. According to CARB, "the EMFAC2014 model can be used to show how California motor vehicle emissions… are projected to change in the future" (CARB, 2014b). Additionally, EMFAC2014 vehicle emission factors are recognized by the South Coast Air Quality Management District (SCAQMD) in the evaluation of air quality impacts in CEQA documents prepared for projects within the south coast region. The model anticipates future vehicle fleets, as well as future regulatory requirements and anticipated improvements in emissions control technologies. It would be misleading to assume that vehicles operating in 2035 would not be required to comply with regulations anticipated to be in effect or that the 2035 vehicle fleet would not include vehicles with improved emission technologies. It would also be speculative, as well as inconsistent with the practices and policies of the USEPA, CARB, and SCAQMD, to estimate vehicle emissions that did not include the types of considerations summarized above. It should be noted that, by comparing Future With Project conditions to Future Without Project conditions, the methodology used in the Draft EIR isolates the effects of the Proposed Project from the effects of the improvements in emission factors. For these reasons, the Draft EIR's use of the standard CEQA methodology of comparing Future With Project emissions to Existing Condition emissions is appropriate for determining air quality significant impacts and represents reasonably foreseeable conditions.

The total emission results are summarized in Table 4.1-15 of the Draft EIR (this table is also included in Appendix D, as Project Incremental Emissions, on page 30 of the appendix).

In summary, the Draft EIR correctly analyzed traffic emissions using appropriate emission factors from approved models (EMFAC2014). The impact of increased congestion on vehicle operating speed (which correlates with vehicle operating time) was analyzed through the increased traffic volumes in the lowest two speed bins under the Future With Project conditions. The impact on emissions was analyzed through the use of speed-dependent emissions factors applied to traffic volumes in each speed bin. The results presented in the Draft EIR provide a reasonable characterization of emissions between the scenarios.

2.5 Responses to Comment Letters Received on the Draft EIR

Letter A1

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

March 8, 2016

Connii Pallini-Tipton
City of Los Angeles
200 N. Spring Street, Room 667
Los Angeles, CA 90012

Subject: Coastal Transp Corridor Specific Plan/W. LA Transp Improvement and Mitigation Specific Plan Amend Project
SCH#: 2014051070

Dear Connii Pallini-Tipton:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on March 7, 2016, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

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

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

1

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

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

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Letter A1

Document Details Report
State Clearinghouse Data Base

SCH# 2014051070
Project Title Coastal Transp Corridor Specific Plan/W. LA Transp Improvement and Mitigation Specific Plan Amend Project
Lead Agency Los Angeles, City of

Type EIR Draft EIR

Description Note: Review Per Lead

Amendments to the CTC Specific Plan and WLA TIMP Specific Plan, including updates to the lists of transportation improvements and mitigation measures funded, in part, by the impact fees from new development; an update tot eh Transportation Impact Assessment (TIA) fee program (revisions to fees, trip generation rates, exemptions, in lieu credits, and affordable housing credits); and new TOD credit. Updated project lists include categories of transportation improvements: transit, bicycle, pedestrian, roadway, intelligent transportation systems (ITS), and trip reduction programs. Other changes include administrative amendments and minor revisions consistent with current legislation, City policies, LADOT traffic study policies and procedures, and current best planning practices.

Lead Agency Contact

Name Connii Pallini-Tipton
Agency City of Los Angeles
Phone 213 978 1179 **Fax**
email
Address 200 N. Spring Street, Room 667
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of
Region
Cross Streets Sunset Bl (N). Imperial hwy (S), Pac Ocean/Santa Monica (W), Bev Hills/Culvert City (E)
Lat / Long 34° 0' 33" N / 118° 26' 11" W
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways I-405, 105 & 10, SR 1 & 90
Airports LAX
Railways Expo Line Ph 2 (future)
Waterways Marina Del Rey, Ballona Creek
Schools Multiple
Land Use Multiple Land use/zoning/general plan designations

Project Issues Biological Resources; Coastal Zone; Noise; Traffic/Circulation; Landuse; Air Quality; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Cal Fire; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Air Resources Board; Regional Water Quality Control Board, Region 4; Native American Heritage Commission; Public Utilities Commission

Date Received 01/07/2016 **Start of Review** 01/07/2016 **End of Review** 03/07/2016

Letter A1

Sheila Brown

clear 3/7/16

From: Lin, Alan S@DOT <alan.lin@dot.ca.gov>
Sent: Monday, March 07, 2016 5:26 PM
To: renata.ooms@lacity.org
Cc: OPR State Clearinghouse; Watson, DiAnna@DOT; Isaacs, Eddie J@DOT; Taira, Linda J@DOT; Ghausi, Yunus M@DOT; Bhuyian, Moe A@DOT; Kibe, Joseph@DOT
Subject: Caltrans Comment-SCH # 2014051070 Coastal Transportation Corridor Specific Plan West Los Angeles Transportation Improvement and Mitigation Specific Plan

Dear Ms. Ooms,

Per our conversation today and meeting on March 1, 2016, we have the following comment for the above project.

The City acknowledged Caltrans' traffic concerns, and consultation with Caltrans took place on March 1 , 2016. As a result, Caltrans would like to propose and reiterate the following new policies to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan (CTCSP/WLA TIMP)-Specific Plans Amendment Project for the City to continue to work with Caltrans.

- The City will involve Caltrans in the revision and update of the future transportation impact Fee program for the Coastal Transportation Corridor Specific Plan and West Los Angele Transportation Improvement and Mitigation Specific Plan that would include the State transportation systems and facilities.

- The City will work with Caltrans closely to identify cumulative traffic impact locations on State facilities and traffic improvements to alleviate traffic congestion within the Specific Plan areas.

- The City will work with neighboring Cities to address cumulative significant traffic impact on I-405, SR-01, and I-10. 2

- The City will work with Caltrans to evaluate access management needs and strategies to better manage traffic operations on arterial streets located within close proximity of freeway on/off-ramps in an effort to reduce traffic backups and frictions at Caltrans transportation systems.

Caltrans and the City agree to finalize the new policy languages that we proposed here.

Caltrans encourages the City to work with neighboring developing cities such as, the City of Santa Monica, City of Inglewood, City of Hawthorne, City of El Segundo, City of Culver City, etc. to resolve any cumulative significant traffic impacts on the State facilities from other cities' development.

As an on-going collaboration, the City and Caltrans will work together to identify potential traffic concerned locations with feasible improvements in the near future. Both agencies agree to periodically review the improvement list and propose any new improvement when available.

Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan.

Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods. 2

Additional comment may be forth coming.

Please let us know if you have any question. Looking forward in working with you.

Sincerely,

Alan Lin, P.E.
Project Coordinator
State of California
Department of Transportation
District 7, Office of Transportation Planning
Mail Station 16
100 South Main Street
Los Angeles, CA 90012
(213) 897-8391 Office
(213) 897-1337 Fax

Governor's Office of Planning & Research
MAR 07 2016
STATE CLEARINGHOUSE

A1	Scott Morgan	State of California, Governor's Office of Planning and Research State Clearinghouse and Planning Unit	3/8/2016

Response to Comment A1-1:

The comment is noted. It is further noted that this letter includes as an attachment a copy of the commenter letter on the Draft EIR that was submitted separately by the California Department of Transportation (Caltrans) (Letter A2); please refer to the Responses to Comment Letter A2.

Response to Comment A1-2:

This letter was submitted separately by Caltrans (Letter A2); please refer to the responses to Comment Letter A2.

From: **Lin, Alan S@DOT** <alan.lin@dot.ca.gov>
Date: Mon, Mar 7, 2016 at 5:25 PM
Subject: Caltrans Comment-SCH # 2014051070 Coastal Transportation Corridor Specific Plan West Los Angeles Transportation Improvement and Mitigation Specific Plan
To: "renata.ooms@lacity.org" <renata.ooms@lacity.org>
Cc: OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>, "Watson, DiAnna@DOT" <dianna.watson@dot.ca.gov>, "Isaacs, Eddie J@DOT" <eddie.isaacs@dot.ca.gov>, "Taira, Linda J@DOT" <linda.taira@dot.ca.gov>, "Ghausi, Yunus M@DOT" <yunus.ghausi@dot.ca.gov>, "Bhuyian, Moe A@DOT" <moe.bhuyian@dot.ca.gov>, "Kibe, Joseph@DOT" <joseph.kibe@dot.ca.gov>

Dear Ms. Ooms,

Per our conversation today and meeting on March 1, 2016, we have the following comment for the above project.

The City acknowledged Caltrans' traffic concerns, and consultation with Caltrans took place on March 1 , 2016. As a result, Caltrans would like to propose and reiterate the following new policies to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan (CTCSP/WLA TIMP)-Specific Plans Amendment Project for the City to continue to work with Caltrans. 1

- The City will involve Caltrans in the revision and update of the future transportation impact Fee program for the Coastal Transportation Corridor Specific Plan and West Los Angele Transportation Improvement and Mitigation Specific Plan that would include the State transportation systems and facilities. 2

- The City will work with Caltrans closely to identify cumulative traffic impact locations on State facilities and traffic improvements to alleviate traffic congestion within the Specific Plan areas. 3

- The City will work with neighboring Cities to address cumulative significant traffic impact on I-405, SR-01, and I-10. 4

- The City will work with Caltrans to evaluate access management needs and strategies to better manage traffic operations on arterial streets located within close proximity of freeway on/off-ramps in an effort to reduce traffic backups and frictions at Caltrans transportation systems. 5

Caltrans and the City agree to finalize the new policy languages that we proposed here. 6

Caltrans encourages the City to work with neighboring developing cities such as, the City of Santa Monica, City of Inglewood, City of Hawthorne, City of El Segundo, City of Culver City, etc. to 7

resolve any cumulative significant traffic impacts on the State facilities from other cities' development. 7

As an on-going collaboration, the City and Caltrans will work together to identify potential traffic concerned locations with feasible improvements in the near future. Both agencies agree to periodically review the improvement list and propose any new improvement when available. 8

Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications. 9

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan. 10

Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods. 11

Additional comment may be forth coming. 12

Please let us know if you have any question. Looking forward in working with you.

Sincerely,

Alan Lin, P.E.
Project Coordinator
State of California
Department of Transportation
District 7, Office of Transportation Planning
Mail Station 16
100 South Main Street
Los Angeles, CA 90012
(213) 897-8391 Office
(213) 897-1337 Fax

A2	Alan Lin	State of California, Department of Transportation	3/7/2016

Response to Comment A2-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment A2-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that the City involve them in updates to the future Specific Plans and TIA fees as they relate to state transportation facilities and does not specifically comment on the adequacy of the EIR. Please see MM-T-3 in Section 4.6, *Transportation,* of the Draft EIR that describes coordination with other agencies on transportation improvements and funding. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment A2-3:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that the City work with them to identify cumulative traffic impacts on state freeway facilities and improvements to alleviate congestion and does not specifically comment on the adequacy of the EIR. The EIR for the Proposed Project analyzed all reasonably foreseeable cumulative impacts related to transportation and traffic. Please see Section 5.1 of the Draft EIR, which evaluates the cumulative impacts of the Proposed Project in conjunction with other reasonably foreseeable future projects. As discussed on Page 5-13, cumulative contributions to CMP freeway segment impacts would be a significant cumulative impact and the Proposed Project's contribution would be cumulatively considerable. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment A2-4:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that the City work with neighboring cities to address cumulative traffic impacts and does not specifically comment on the adequacy of the EIR. Please see response to comment A2-3 related to cumulative impacts. Please see MM-T-3 in Section 4.6, *Transportation,* of the Draft EIR that describes coordination with other agencies on transportation improvements and funding. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR or otherwise provide any substantial evidence that supports the need for new analysis or conclusions in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment A2-5:

The content of this comment is similar to, and raises the same issues as those raised in, comment A2-2; please refer to Response to Comment A2-2.

Response to Comment A2-6:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding policy language and does not specifically comment on the adequacy of the EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment A2-7:

The content of this comment is similar to, and raises the same issues as those raised in, comment A2-4; please refer to Response to Comment A2-4.

Response to Comment A2-8:

The content of this comment is similar to, and raises the same issues as those raised in, comment A2-2; please refer to Response to Comment A2-2.

Response to Comment A2-9:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the need for an encroachment permit when constructing projects in state right-of-way and stating that projects along state facilities must meet design standards and does not specifically comment on the adequacy of the EIR or mention any improvements on the specific plan project lists. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment A2-10:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding stormwater run-off and does not specifically comment on the adequacy of the EIR. While a wide range of transportation improvements are contemplated in the proposed amendments to the CTCSP and WLA TIMP, these improvements would not be entitled or constructed as part of this Proposed Project. As such, design details have not been determined for the transportation improvement projects included in the Proposed Project. Design and construction will comply with applicable federal, state, and local laws pertaining to stormwater and clean runoff, including developing a Stormwater Pollution Prevention Plan and implementing best management practices.

Response to Comment A2-11:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the requirements for heavy construction equipment and requesting that large construction vehicles be limited to off-peak commute periods and does not specifically comment on the adequacy of the EIR. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of transportation impacts related to construction. Impact 4.6-8 states that the implementation of the Proposed Project would result in substantial disruption to traffic during construction, and MM-T-4 states that construction activities would be managed by LADOT through the approval of traffic control plans. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment A2-12:

This comment is noted. Caltrans did not provide any additional comments on the Draft EIR.

Letter A3

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

March 7, 2016

Conni Pallini-Tipton
City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012

RE: Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan (CTCSP/WLA TIMP) Specific Plans Amendment Project- City of Los Angeles- Draft Environmental Impact Report- (ENV-2014-1458-EIR)

Dear Ms. Pallini-Tipton:

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the proposed Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan (CTCSP/WLA TIMP) Specific Plans Amendment Project located in the City of Los Angeles. The proposed project consists of amendments to the CTCSP and WLA TIMP. The amendments include an update to the list of transportation improvements and mitigation measures to be funded, in part, by the impact fees collected from new development; an update to the Transportation Impact Assessment (TIA) fee program, including revisions to the fees, trip generation rates, exemptions, in-lieu credits, and affordable housing credits; and a new transit – oriented development credit. The proposed Project's updated project lists include the following categories of transportation improvements: transit, bicycle, pedestrian, roadway, intelligent transportation system (ITS), and trip reduction programs. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed project. 1

Several Metro bus lines operate within the Specific Plan area. Metro has standard language that relates to construction activity adjacent to bus transit facilities. Metro recommends that the Specific Plan include language that informs future development activity within the Specific Plan area of Metro's notification procedures and considerations for projects located in close proximity to a Metro facility that may impact Metro bus operations. 2

The Metro Expo Line Phase 2 light rail is currently under construction within the Specific Plan area. Metro has an Adjacent Construction Design Manual that describe the Metro's development project review process and considerations for project siting as it relates to Metro facilities. Metro suggests that the project sponsor include policy language or guidance in the Specific Plan that clearly denotes that development occurring within 100 feet of a Metro facility will require Metro review and approval and compliance with Metro's Development Guidelines. In particular, because of the proximity to the Metro Expo Line Phase 2, increased traffic at railroad grade crossings must be considered specifically in the Specific Plan. Provisions for transit priority treatments should be considered to make the development welcoming to transit access. 3

In addition, the Specific Plan has various policies in place that support active transportation and multi-modalism. Metro looks forward to continuing to collaborate with the City to effectuate policies and implementation activities that promote transit supportive communities and reduce pedestrian/bike and bus conflicts. 4

If you have any questions regarding this response, please contact Elizabeth Carvajal at 213-922-3084 or by email at DevReview@metro.net. **LACMTA looks forward to reviewing the Final EIR. Please send it to the following address:**

LACMTA Development Review
One Gateway Plaza MS 99-23-4
Los Angeles, CA 90012-2952

Sincerely,

Elizabeth Carvajal
Transportation Planning Manager

Attachment: Adjacent Construction Design Manual

A3 Elizabeth A. Carvajal Los Angeles County Metropolitan Transportation Authority 3/7/2016

Response to Comment A3-1:

The comment is noted. Please see responses to specific comments below.

Response to Comment A3-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment A3-3:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment A3-4:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter acknowledges that the City will collaborate with the Los Angeles County Metropolitan Transportation Authority (Metro) to effectuate polices and implementation activities that promote transit supportive communities and reduce pedestrian/bike and bus conflicts and does not specifically comment on the adequacy of the EIR. Please see MM-T-3 in Section 4.6, *Transportation,* of the Draft EIR that describes coordination with other agencies on transportation improvements and funding. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Letter A4

March 7, 2016

Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N. Spring Street, Room 667
Los Angeles, CA 90012

RE: Notice of Availability of Draft Environmental Impact Report (DEIR) for the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan (the Project)

Dear Ms. Pallini-Tipton:

Thank you for providing the City of Beverly Hills (City) with the opportunity to comment on the DEIR for the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Imprvement and Mitigation Specific Plan Project (Project). Due to the Project's close proximity to the City of Beverly Hills, there is a potential that the City of Beverly Hills and its residents could experience impacts as a result of the project. We have reviewed the DEIR and would like to provide the following comments on the Project: 1

THE PROJECT:

The City of Beverly Hills is generally supportive of many of the improvements that are proposed for inclusion in the Specific plan as part of the project. Specifically the City is supportive of the measures that are meant to decrease congestion in the Westside region such as the roadway and ITS improvements and trip reduction programs. 2

We acknowledge that the Project does not include the approval or construction of the projects and programs that are included in the Proposed Project list; however, the City of Beverly Hills would like to 3

be noticed of the projects that are near the City as they move forward and would like to work with the City of Los Angeles into the future. The City is particularly interested in working with the City of Los Angeles to continue to ensure that any future construction and operation of the proposed projects does not negatively impact the City and that the proposed projects near Beverly Hills integrate with our existing and planned transportation system. 3

TRAFFIC

1. The "Boulevard" and "Avenue" designations mentioned on page 4.6-10 do not mention the inclusion of on-street parking. Knowledge of this information would help the City of Beverly Hills designate similar streets in the City 4

2. Correction on Figure 4.6-3 – The full length of Wilshire and Olympic Boulevards are 6 lanes in Beverly Hills. 5

Thank you again for the opportunity to review the DEIR for the Project. If you have any questions regarding this letter, please feel free to contact me at (310) 285-1118 or by email at rgohlich@beverlyhills.org.

Sincerely,

RYAN GOHLICH, AICP
Assistant Director/City Planner
Community Development Department

cc: Mahdi Aluzri, City Manager
George Chavez, Assistant City Manager
Susan Healy Keene, AICP, Director of Community Development
Aaron Kunz, AICP, Deputy Director of Transportation
Scott Stephens, Fire Battalion Chief
Lincoln Hoshino, Police Sergeant

A4 Ryan Gohlich City of Beverly Hills 3/7/2016

Response to Comment A4-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see responses to specific comments below.

Response to Comment A4-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment A4-3:

The content of this comment is similar to, and raises the same issues as those raised in, comment A2-2; please refer to Response to Comment A2-2.

Response to Comment A4-4:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The *Complete Streets Design Guide: Great Streets for Los Angeles* (City of Los Angeles, undated) contains sample cross-sections for the City's "Boulevard" and "Avenue" designations. Sample cross-sections with and without on-street parking are provided in the document. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment A4-5:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The portions of Wilshire and Olympic Boulevards that are shown in Figure 4.6-3 as four lanes reflect the on-street parking permitted during off-peak travel hours. While both roadways provide 6 travel lanes during peak hours, only four lanes of travel are provided along portions of the roadways during much of the day. The Westside TDF Model, as documented in the Model Development Report contained in Appendix F of the Draft EIR, considers the roadway capacity during the morning and evening peak travel periods as well as during off-peak periods. The 6-lane capacity of Wilshire and Olympic Boulevards during peak travel hours in the City of Beverly Hills is reflected is the Westside TDF Model. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Comments DCP DEIR Coastal Transportation Corridor Specific Plan (CTCSP) and WLA TIMP due 3.7.2016

Attached are my comments omitted from the Notice of Preparation (Appendix C) with the acknowledgement by Ms. Conni Pallini on June 24, 2014. 1

The PROJECT DESCRIPTION stated is as follows:

> **PROJECT DESCRIPTION**: LADCP has prepared a Draft Environmental Impact Report (EIR) for the proposed amendments to the CTCSP and WLA TIMP (Proposed Project), pursuant to the California Environmental Quality Act (CEQA).
>
> The amendments include an update to the Transportation Impact Assessment (TIA) fee program, including revisions to the fees, trip generation rates, exemptions, in lieu credits, and affordable housing credits; a new transit-oriented development (TOD) credit; and updates to the lists of transportation improvements and mitigation measures to be funded, in part, by the impact fees collected from new development. 2
>
> The updated transportation improvement lists include the following categories of transportation improvements: transit, bicycle, pedestrian, roadway, intelligent transportation systems (ITS), and trip reduction programs.
>
> Other proposed changes include administrative amendments and minor revisions that are consistent with recent California State legislation, transportation policies in the **City's General Plan Elements**, and **City of Los Angeles Department of Transportation's (LADOT) Traffic Study Policies and Procedures**, and are in line with current best planning practices.

Comments:

City of Los Angeles under the Bureau of Sanitation jurisdiction has obligated the City to execute compliance for the NPDES Permit No. CAS004001 Order No. R4-2012-0175 through Enhanced Watershed Management Plans EWMPs. 3

This permit is too large to attach, but can be found at:

http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/index.shtml#los_angeles

EWMPs have been prepared for the BALLONA CREEK WATERSHED PROGRAM and the SANTA MONICA BAY (SMB) JURISDICTIONAL GROUPS 2 AND 3 (JG2/JG3) ENHANCED WATERSHED MANAGEMENT PROGRAM. Low Impact Development LID and Green Streets are required. 4

BALLONA CREEK WATERSHED PROGRAM EWMP states under Watershed Control Measures:

> *The total network of LID, green streets and regional BMPs in the EWMP Implementation Strategy represents over eight Rose Bowls of BMP capacity. For EWMP development it was important to establish nomenclature/definitions of the various control measures. The following categories of distributed and regional approaches control measures make up the EWMP Implementation Strategy.*

And

> *As shown in Figure ES-7, for the set of BMP to be implemented across the entire BC EWMP area by 2021, regional projects on public land make up 18 percent of the total control measure capacity. LID and green streets each make up 13 percent and 17 percent, respectively. Regional BMPs on private land make up over half the capacity, due to limited public space for constructing control measures.*

4

This plan is too large to be attached, but can be found at:

http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/ballona_creek/index.shtml

Estimated cost for implementation of the BALLONA CREEK WATERSHED PROGRAM EWMP is approximately $4,278,450,000.

SANTA MONICA BAY (SMB) JURISDICTIONAL GROUPS 2 AND 3 EWMP states:

> *The EWMP summarizes watershed control measures, including BMP types and existing BMPs, which reduce the current pollutant load to meet past and future compliance requirements. In addition, the EWMP summarizes BMPs that will be implemented to meet Permit compliance requirements, including institutional (non-structural) and structural BMPs consisting of low impact development (LID), distributed green streets, and regional BMPs.*

5

The proposed GREEN STREET AREA is 4,412,791 square feet for the City of Los Angeles area in the SMB JG2/JG3 EWMP.

This plan is too large to be attached, but can be found at:

http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/santa_monica/index.shtml

Estimated cost for implementation of the SANTA MONICA BAY (SMB) JURISDICTIONAL GROUPS 2 AND 3 EWMP is approximately $743,350,000. 5

Your Project Description is not accurate for the commitments made by the City. You state:

> **ANTICIPATED SIGNIFICANT ENVIRONMENTAL EFFECTS**
>
> Proposed Project would result in unavoidable significant environmental impacts with regard to:
>
> - Air Quality (localized effects from daily emissions during construction and cumulative effects from localized construction impacts),
> - Noise (construction-related noise and vibration levels, operational noise levels from curb-running bus operations at some sensitive land uses), and
> - Transportation (vehicular circulation, neighborhood intrusion, CMP and state freeway segments, construction impacts). 6
>
> Other issues addressed in the EIR include:
>
> - Biological Resources;
> - Greenhouse Gas Emissions; and
> - Land Use and Planning.
>
> Impacts associated with these topics were determined to be less than significant, or less than significant with the implementation of mitigation measures.

Comments:

HYDROLOGY AND WATER QUALITY, PUBLIC SERVICES and UTILITIES AND SERVICE SYSTEMS may be affected. 7

There is no CIRCULATION ELEMENT, updated as required by State law, which is necessary for this environmental document. Governors' Office of Planning and Research Update of the General Plan Guidelines states:

> *The circulation element is not limited to transportation network issues. For the purpose of the circulation element, circulation includes all systems that move people, goods, energy, water, sewage, storm drainage, and communications. As a result, the circulation element should contain objectives, policies, and standards for transportation systems, including multimodal transportation networks, airports and ports, military facilities and operations, and utilities.* 8

By statute, the circulation element must correlate directly with the land use element.[25] Land use patterns can have a significant impact on the effectiveness of a multimodal transportation network, since trip distance is a determinant of whether pedestrians and bicyclists, as well as transit users walking or bicycling to and from terminals, can reach a given destination. The land use plan and transportation network should be complementary. The close proximity of land uses can also facilitate effective transportation services and provide the ridership necessary to support high quality mass transit. Multimodal transportation policies should link transportation planning and land use planning to support effective multimodal transportation networks that connect people with desired destinations. This means that although AB 1358 only requires cities and counties to modify the circulation element to plan for a balanced, multimodal transportation network, jurisdictions will need to examine, and amend as necessary, the land use element. Jurisdictions should also consider the housing, open space, noise, conservation, and safety elements.

8

This EIR is deficient, needs to be updated with the proper information and recirculated. No objective can be meant as presented.

9

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

Attachment:
6.24.2014 Re Comments DCP ENV-2014-1458-EIR NOP CTCSP and WLA TIMP due 6.23.2014

Letter PC1

Subject:	Re: Comments DCP ENV-2014-1458-EIR NOP CTCSP and WLA TIMP due 6.23.2014
From:	Conni Pallini (conni.pallini-tipton@lacity.org)
To:	dillardjoyce@yahoo.com;
Date:	Tuesday, June 24, 2014 11:12 AM

Hello Ms. Dillard,

Thank you for your comments, they will be analyzed along with comments received from agencies and other members of the public.

To address your question regarding lead agency, this project is a City of Los Angeles project, led jointly by the Department of City Planning and the Department of Transportation. The EIR is being prepared for the update of two Specific Plans which primarily address the assessment of fees on new development to help fund transportation improvements. Please feel free to give me a call if you care to discuss the project.

Sincerely,
Conni

Conni Pallini-Tipton, AICP
City Planner
Policy Planning Division
Department of City Planning | City of Los Angeles
213.978.1179 | 213.978.1477 fax
www.planning.lacity.org

On Mon, Jun 23, 2014 at 4:56 PM, Joyce Dillard <dillardjoyce@yahoo.com> wrote:

> This email address provided is not a city email address. We question that the Department of City Planning is taking responsibility as a Lead Agency. 10
>
> Please note that the City has not complied with Framework Element Policy No. 3.3.2 which is the monitoring aspect of CEQA for the General Plan. It reads:
>
> > 3.3.2 Monitor population, development, and infrastructure and service capacities within the City and each community plan area, or other pertinent service area.
> >
> > The results of this monitoring effort will be annually reported to the City Council and shall be used in part as a basis to: 11
> >
> > > a. Determine the need and establish programs for infrastructure and public service investments to accommodate development in areas in which economic development is desired and for which growth is focused by the General Plan Framework Element.

Letter PC1

b. Change or increase the development forecast within the City and/or community plan area as specified in Table 2-2 (see Chapter 2: Growth and Capacity) when it can be demonstrated that (1) transportation improvements have been implemented or funded that increase capacity and maintain the level of service, (2) demand management or behavioral changes have reduced traffic volumes and maintained or improved levels of service, and (3) the community character will not be significantly impacted by such increases. Such modifications shall be considered as amendments to Table 2-2 and depicted on the community plans.

c. Initiate a study to consider whether additional growth should be accommodated, when 75 percent of the forecast of any one or more category listed in Table 2-2 (see Chapter 2: Growth and Capacity) is attained within a community plan area. If a study is necessary, determine the level of growth that should be accommodated and correlate that level with the capital, facility, or service improvements and/or transportation demand reduction programs that are necessary to accommodate that level. 11

d. Consider regulating the type, location, and/or timing of development, when all of the preceding steps have been completed, additional infrastructure and services have been provided, and there remains inadequate public infrastructure or service to support land use development. (P42, P43)

Annual Reports for Infrastructure have not been executed. Attached is the Infrastructure Report Card for 2010-2011.

Without the compliance for consistency, Circulation Element issues are not address properly. Complete Streets is an aspect of all circulation issues including freight movement, pipelines and traffic congestion. 12

You cannot access the accuracy of the existing plans in order to adjust and make consistence the newer versions. 13

You have not proven the reason for the following statement:

> Vehicles Miles Traveled VMT will be used as performance measure not the traditional Automobile Level of Service LOS 14

Your proposal to remove exemptions from Single Family Residential Development Multi-Family Residential Development may have no basis in fact. 15

The following need substantiation with facts:

- Roadway Projects
- Intelligent Transportation Systems
- Transit Improvements
- Trip Reduction Programs
- Bicycle and Pedestrian Improvements
- Green Streets

16

Soils and geology and hazardous materials need to be addressed as landslide, 17

Letter PC1

liquefaction or methane and related gas issues may involve issues beyond the scope of the two plans. 17

Public Health and Safety needs first consideration. 18

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

Attachment:
INFRASTRUCTURE REPORT CARD_2010_2011 B&W

PC1 Joyce Dillard 3/7/2016

Response to Comment PC1-1:

Please see responses to comments below.

Response to Comment PC1-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC1-3:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Attachment 1 of the Notice of Preparation (provided in Attachment C of the Draft EIR) for an evaluation of stormwater impacts associated with construction and implementation of the transportation projects. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC1-4:

This comment is noted. As noted in Attachment 1 of the Notice of Preparation (provided in Attachment C of the Draft EIR), certain transportation improvements may be subject to the Los Angeles Regional Water Quality Control Board's (RWQCB) Standard Urban Storm Water Mitigation Plan (SUSMP) requirements and Low Impact Development (LID) practices.

Response to Comment PC1-5:

Please see response to comment PC1-4 regarding the applicability of LID requirements.

Response to Comment PC1-6:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter restates the significance conclusions of the Draft EIR. The commenter further states that the "project description is not accurate for the commitments made by the City." The commenter provides no further details regarding how the project description is inaccurate and provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response regarding the accuracy of the project description is required (State CEQA Guidelines Section 15204(c). Regarding other environmental resources that the commenter asserts may be affected by the Proposed Project, please see Responses to Comment PC1-7 below.

Response to Comment PC1-7:

This comment is noted. Appendix C, *Notice of Preparation/Scoping,* of the Draft EIR includes an assessment of impacts of the Proposed Project on hydrology and water quality, public services and utilities, and service systems. The analysis determined that impacts would be less than significant to these resources and they would not be further evaluated in the EIR. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC1-8:

The commenter expressed concerns related to the statutory requirements for a Circulation Element and consistency with adopted land use plans. This comment does not pertain to the adequacy of the EIR and no response is required. It should be noted that the State of California and the Los Angeles City Charter require that Los Angeles create and adopt a general plan. The City's General Plan is the constitution for all future developments and as such is the heart and foundation of the City's long-range vision for growth. The State requires that each jurisdiction's general plan include seven mandatory elements: Land Use, Circulation, Housing, Conservation, Open Space, Safety, and Noise, but communities may also include additional elements that are tailored to meet specific needs and concerns. While State law requires that the various plans be internally consistent, cities are free to select a distinct name for each element and are permitted to combine and/or disaggregate the individual components of the elements in a manner that is practical for the jurisdiction.

The Mobility Plan 2035, or MP 2035, (formerly the Transportation Element) is the transportation blueprint for the City of Los Angeles (City of Los Angeles Department of City Planning, 2016). Prior to the 2015 adoption of the MP 2035, the Transportation Element was last updated in 1999. MP 2035 revamped the Transportation Element to reflect the policies and programs that will give Angelenos a full range of options to meet their mobility needs, including bicycling, carpooling, driving, transit, and walking. The MP 2035 lays the policy foundation for safe, accessible and enjoyable streets for pedestrians, bicyclists, transit users, and vehicles alike.

For the City of Los Angeles, the Transportation Element, together with long-range planning documents from operational departments (including Los Angeles World Airports, Port of Los Angeles, Department of Water and Power, Department of Public Works), provides compliance with Government Code Section 65302 (b) which requires that a general plan include a circulation element consisting of the general location and extent of existing and proposed major thoroughfares, transportation routes, terminals, and other public utilities and facilities, all correlated with the Land Use Element of the General Plan.

Response to Comment PC1-9:

This comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Previous comments in this letter are addressed in the above responses. This comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC1-10:

The project is a City of Los Angeles project, led jointly by the Department of City Planning and the Department of Transportation. The City of Los Angeles is serving as the lead agency pursuant to CEQA. All comments on the Draft EIR sent via emails to the email address identified in the Draft EIR were received by the City of Los Angeles Department of City Planning.

Response to Comment PC1-11:

The commenter claims that the City generally has not complied with Framework Element Policy 3.3.2 and also claims that the City has not been completing annual infrastructure reports.

Framework Element

The comment regarding Framework Element Policy 3.3.2 does not make a statement regarding the Proposed Project or the environmental analysis of the Proposed Project. Furthermore, the comment provides no specific evidence for the claim made regarding the City's compliance with Policy 3.3.2.

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Section 4.4, *Land Use and Planning,* of the Draft EIR for a discussion of impacts related to land use and planning. Please see Response to Comment PC5-15 regarding the Proposed Project's consistency with the Framework Element and Policy 3.3.2. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Infrastructure Report

Pursuant to the Mitigation Fee Act, reporting and monitoring of the proposed TIA fee program will occur as part of the Proposed Project (California Government Code, Sections 66000-66026). However, the city-wide infrastructure monitoring and reporting process referenced in this comment occurs outside of the scope of the Proposed Project. The Draft EIR describes the Proposed Project in Chapter 3, *Project Description,* pages 3-1 to 3-31.

As a point of information to the commenter, the Department of City Planning monitors growth and infrastructure through many activities, including the publication of development activity data and Census data on the Department's website, the Housing Element of the General Plan (and its Annual Report), and the Mayor's DataLA open data portal. In 2015, the Department published the sixth in a series of reports providing detailed information on City demographics, development activity, infrastructure and public facilities. It is called the 2014 Growth and Infrastructure Report (City of Los Angeles Department of City Planning, 2014). The Planning Department is currently developing the 2015 Report on Growth and Infrastructure, anticipated for release later this year (i.e., 2016). No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the CTCSP/WLA TIMP Amendment Project Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Finally, the comment regarding infrastructure reporting provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required. (State CEQA Guidelines Section 15204(c)).

Response to Comment PC1-12:

The commenter expressed concerns related to the statutory requirements for a Circulation Element and consistency with the Complete Streets Act.

Circulation Element

The content of this comment is similar to, and raises the same issues as those raised in, comment PC1-8; please refer to Response to Comment PC1-8 regarding consistency the circulation element.

Complete Streets Act

It is not entirely clear how the comment regarding Complete Streets is related to the environmental analysis of the Proposed Project. To the extent that the comment is referring to the analysis conducted for the Proposed Project, consistency with the California Complete Streets Act (AB 1358) is discussed in Section 4.4, *Land Use and Planning,* of the Draft EIR (page 4.4-26). As discussed in the Draft EIR (page 4.6-5), the MP 2035, the City's Circulation Element, was prepared in compliance with the 2008 Complete Streets Act (AB 1358), which mandates that when the circulation element of the General Plan is modified that it plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways. The Proposed Project's consistency with MP 2035 is discussed under Impact 4.6-1 and 4.4-2 of the Draft EIR (pages 4.6-50 and 4.4-28). The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC1-13:

The content of this comment is similar to, and raises the same issues as those raised in, comment PC1-12; please refer to Response to Comment PC1-12.

Response to Comment PC1-14:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of impacts related to the circulation system. Impacts 4.6-2 and 4.6-4 describe the level of service impacts anticipated with the Proposed Project. The commenter is incorrect that automobile level of service is not considered as a performance measure in the Draft EIR. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC1-15:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the proposed fee for single family residential units. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC1-16:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the improvements included in the Proposed Project list updates. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC1-17:

Appendix C, *Notice of Preparation/Scoping,* of the Draft EIR includes an assessment of impacts of the Proposed Project on geology and soils, including landslides, and hazards and hazardous materials. The analysis determined that, based on information currently known at this level of planning, impacts to these resources would be less than significant and they would not be further evaluated in the EIR. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC1-18:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Section 4.1, *Air Quality,* of the Draft EIR for a discussion of impacts associated with air quality and public health risk and Section 4.6 *Transportation,* of the Draft EIR of the Draft EIR for discussion of impacts associated with public safety related to traffic. Impact 4.6-7 describes the safety impacts anticipated with the Proposed Project, which were found to be less than significant. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Letter PC2

ALSTON&BIRD LLP
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March 7, 2016

VIA E-MAIL AND HAND DELIVERY

City of Los Angeles, Department of City Planning
Conni Pallini-Tipton, AICP, Senior City Planner
200 North Spring Street, Room 667
Los Angeles, CA 90012
westside2@fehrandpeers.com

Re: West Los Angeles Transportation Improvement and Mitigation Specific Plan ("WLA TIMP") and Draft Environmental Impact Report

Dear Ms. Pallini-Tipton:

We represent Twentieth Century Fox Film Corporation ("Fox") regarding its Century City Studios, and we are writing to provide comments regarding the proposed WLA TIMP and the accompanying Draft Environmental Impact Report ("Draft EIR") prepared by the City to comply with the California Environmental Quality Act ("CEQA"). As a preliminary matter, we appreciate the City's efforts to update the WLA TIMP for the future of the Westside, particularly given Fox's proposed Master Plan project to update the Studios for the future. We look forward to understanding better how the WLA TIMP will be implemented, and more importantly, to finding successful and innovative solutions to mobility. With that in mind, Fox respectfully submits the following comments. 1

1. Vehicle Miles Traveled

As noted in the Draft EIR, vehicle miles traveled ("VMT") is a new performance metric for transportation effects, as explained in the August 6, 2014 preliminary discussion draft of "Updating Transportation Impacts Analysis in the CEQA Guidelines" issued by the State's Office of Planning and Research ("OPR"). (Draft EIR, p. 4.6-49.) OPR's discussion draft also recommends a comparison of the area VMT per capita/service population to the Citywide and regional averages. What are the WLA TIMP area VMT per capita/service population values and how do those average values for the WLA TIMP area numerically compare to the Citywide and regional averages? To what degree would the proposed amendments to the WLA TIMP numerically improve those values and that comparison? 2

The proposed WLA TIMP indicates that the City has "the discretion to determine the appropriate data input to the TIA Fee calculation" for "Special Generators." (Table 1, WLA TIMP.) Please confirm the "appropriate data input" to be used for a "special generator" – would it include trip generation and VMT? Given that the uses at Fox's Studios consist of a multi-media entertainment campus, we expect to be characterized as a "special generator" under the proposed WLA TIMP. Would the amount of "special generators" in the WLA area change the fee analysis or the CEQA evaluation in any way? 3

2. Transportation Improvements

Fox Studios has implemented its own detailed Transportation Demand Management ("TDM") Program over the past 20 years and is supportive of the proposed WLA TIMP amendments to provide for additional transportation improvements. However, neither the proposed amendments nor the Draft EIR appear to identify program incentives that might be available for additional TDM participation by area employers. Are the proposed amendments to the WLA TIMP designed to provide employer TDM programs and incentives for those programs? 4

The proposed amendments to the WLA TIMP provide fee incentives for affordable housing, but given the importance of affordable housing and the potential to reduce VMT, does the City intend to provide any other incentives that encourage the provision of affordable housing? 5 Also, how was the affordable housing component evaluated in the CEQA analysis, particularly with respect to the reduction of VMT? Specifically, were lower vehicle trip generation rates and a higher linkage of local trips to local jobs directly assumed for affordable housing, and/or were the model input parameters varied? 6

The 2035 Mobility Plan contains a number of improvements that were not selected for inclusion in the WLA TIMP. How is the treatment of one or more of these improvements in the Mobility Plan, but not selected for the WLA TIMP, to be treated for fee credits? For example, would improvements along Pico Boulevard and other corridors that serve the Century City area be eligible for fee credits? 7

3. Transit Oriented Development

All (or a significant portion) of Century City would qualify as a Transit Oriented Development ("TOD") under the OPR proposed CEQA Guidelines. Was this factored into the CEQA analysis? The WLA TIMP sets a more rigorous standard for fee adjustments. More specifically, regarding the Pico Boulevard and Olympic Boulevard bus upgrades, which portion of Century City would qualify as a TOD area for CEQA purposes? Which portion of Century City would qualify for fee adjustments? Does the timing of those upgrades change the environmental review for the proposed project? 8

4. Westside Travel Demand Forecasting Model

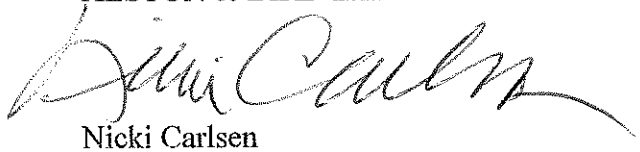
The Draft EIR relies on the Westside Travel Demand Forecasting Model which is further explained in Appendix F to the Draft EIR, Westside Mobility Plan, Model Development Report. The proposed WLA TIMP amendments include signal system and local intersection improvements in the list of identified transportation improvements. How were the capacity increases due to those improvements taken into account in the model, and what were the numerical adjustments made to the model or the post-processed results? 9

The forecasting model also considers use of the freeway system. What transportation improvements or changes were assumed in the model for the freeway system for both the WLA TIMP area and the Coast Transportation Corridor Specific Plan area? How were those improvements selected, and were those improvements or changes factored into the environmental analysis? 10

Fox appreciates the opportunity to submit these comments to the City. Again, we support the City's efforts to refresh the WLA TIMP, and believe that it will be an effective tool for improving mobility. Fox looks forward to working with the City to implement the new WLA TIMP as it processes its proposed Master Plan project with the City. 11

Sincerely,

ALSTON & BIRD LLP



Nicki Carlsen

NC:dtc

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PC2	Nicki Carlsen	Alston & Bird, LLP (Twentieth Century Fox Film Corporation)	3/7/2016

Response to Comment PC2-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see responses to specific comments below.

Response to Comment PC2-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is asking for the VMT per capita/service population values in the West LA TIMP area, how they compare to the Citywide and regional averages, and how VMT would change with the proposed Specific Plan amendments. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of VMT in the West LA TIMP area along with the expected changes in VMT with the Proposed Project. As part of SB 743, regional VMT data would be provided by the Southern California Association of Governments (SCAG) as part of its Regional Transportation Plan and Sustainable Communities Strategy. The revised State CEQA Guidelines under SB 743 are still under review by OPR. Neither SCAG nor the City of Los Angeles have developed VMT per capita thresholds at this time, as they are waiting for SB 743 guidelines to be finalized. As described in Section 4.6, VMT has been provided for informational purposes only and impacts are based on current CEQA and City guidelines (see Impacts 4.6-2 and 4.6-4 related to level of service impacts anticipated with the Proposed Project). No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC2-3:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is asking for additional information on the trip fees for special generators and does not specifically comment on the adequacy of the EIR. Special generators are defined in the Specific Plan ordinances. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC2-4:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is asking for additional information on the Transportation Demand Management programs in the project list and does not specifically comment on the adequacy of the EIR. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC2-5:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is asking about the inclusion of additional affordable housing incentives and does not specifically comment on the adequacy of the EIR. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC2-6:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is asking if the lower VMT generated by affordable housing uses was accounted for in the CEQA analysis, and specifically if local jobs serving affordable housing uses were included in the model variables and does not specifically comment on the adequacy of the EIR. The Proposed Project does not propose any zoning or land use changes. Please see Chapter 3, *Project Description*, of the Draft EIR. The City recognizes that there are potential VMT benefits that additional affordable housing could provide and the City is currently studying the potential VMT difference between different housing types; this study is occurring outside the scope of the Proposed Project. However, the City does not currently have a metric quantifying VMT benefits from affordable housing as compared to market rate housing. Therefore, the VMT analysis of the Proposed Project used a conservative approach and used a market rate VMT assumptions for housing in the Plan area based on the City of Los Angeles Travel Demand Forecasting Model described in Section 4.6, *Transportation,* and Appendix F, *Model Development Report,* of the Draft EIR. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC2-7:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is asking for additional information on the trip fees credits and does not specifically comment on the adequacy of the EIR. Fee credits are defined in the Specific Plan ordinances. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC2-8:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that much, if not all, of Century City would qualify as TOD under the OPR guidelines and is asking if this was reflected in the CEQA analysis. It is not entirely clear what the commenter is asking related to TOD and CEQA requirements. To the extent that the question is referring to the analysis conducted for the Proposed Project, the Westside TDF Model, as documented in the *Model Development Report* contained in Appendix F of the Draft EIR, considers built environment variables commonly associated with TODs, such as density, land use mix, and accessibility to major destinations along with the travel options available, such as proximity to transit. Consequently, the built environment variables and travel

options within the study area, including Century City, are reflected in the transportation impact analysis described in Section 4.6, *Transportation,* of the Draft EIR.

In addition, the commenter is asking for additional information on the fee credits for TOD sites. TOD credits are defined in the Specific Plan ordinances. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC2-9:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is asking as to how the potential signal upgrades and local intersection improvements are considered in the Westside TDF Model and does not specifically comment on the adequacy of the EIR. Please see the discussion under Impact 4.6-2 for information on how the model and analysis results account for these types of improvements. Given the programmatic level of analysis completed for the EIR, a conservative approach was taken to identify potential impacts. As discussed in Impact 4.6-2, the model is not sensitive to improvements at the intersection level of detail, such as signal timing changes or an additional turn lane, nor is it sensitive to corridor ITS improvements. Consequently, the model likely underestimates the operational benefits of projects, such as ITS or signal upgrades, included in the updated project lists. In other words, not all benefits from the improvements are captured in the Future with Project operational results; the level of service results modeled under Future with Project conditions are likely worse than would actually occur if the proposed improvements were constructed. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC2-10:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is asking about the future freeway network in the study area that is reflected in the Westside TDF model and does not specifically comment on the adequacy of the EIR. Please see the discussion in Section 4.6, *Transportation,* of the Draft EIR for information on the future roadway network assumptions contained in the model. The model accounts for freeway improvements contained in the SCAG 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG, 2012) as these improvements are planned for implementation by Year 2035, which is the future year used for the analysis contained in the Draft EIR. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC2-11:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

BHA BEVERLYWOOD HOMES ASSOCIATION

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March 7, 2016

Ms. Conni Pallini-Tipton
Department of City Planning, City of Los Angeles
200 N. Spring Street, Room 667
Los Angeles, CA 90012

CTCSP/WLA TIMP Draft Environmental Impact Report
LA City EIR No. ENV-2014-1458-EIR/ CPC Nos. 2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)

On behalf of the Beverlywood Homes Association, I offer the following comments on the proposed amendments to the West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP). The purpose of the WLA TIMP Specific Plan is to adopt a list of projects and programs eligible for impact fee funding to mitigate traffic impacts of the anticipated increase in commercial development in the Westside.

The Beverlywood Homes Association represents 1,354 single family homes bounded by Monte Mar Drive to the north, Hillcrest Country Club and Anchor Avenue to the west, Beverlywood Street to the south, and Robertson Boulevard to the east. There are three neighborhood schools within the boundaries of Beverlywood. 1

Our residential neighborhood is severely impacted by commuter traffic between Century City and the I-10 Freeway. Congestion on the route of Pico Boulevard to Robertson Boulevard, which leads to the freeway, causes extraordinary "cut-thru" traffic volumes on Beverwil/Castle Heights and other residential streets in our neighborhood.
As a result, we have been working with our Council representatives to develop a comprehensive neighborhood traffic management plan (NTM). Preserving the residential nature of our neighborhood in terms of safe streets is the paramount value to mitigating traffic impacts of the commercial development contemplated in the WLA TIMP Specific Plan.

With regards to the goal of preserving our residential neighborhood, I offer the following comments and suggestions for your consideration regarding the WLA TIMP Specific Plan.

1. Specific Plan Boundaries

The WLA TIMP Specific Plan eastern boundary (Beverwil/Castle Heights) divides our neighborhood and ignores the primary mobility issue affecting us – namely 2

congestion along the route: Pico Boulevard to Robertson Boulevard to the I-10 Freeway. The TIMP boundary should be extended to cover Pico Boulevard easterly to Robertson Boulevard; and then Robertson southerly to the I-10 Freeway. See Exhibits 1 and 2 which depict the respective boundaries of the WLA TIMP and the BHA neighborhood. **2**

2. Motor Avenue Cycle Track

   Implementation of the Motor Avenue Cycle Track will further increase congestion along Motor Avenue, the nearest alternate route between Century City and the I-10 Freeway. The diverted traffic will increase congestion at the Pico/Robertson intersection and thus increase the amount of "cut-thru" traffic along Beverwil/Castle Heights and other local residential Beverlywood streets. **3**

3. Roadway and ITS Improvements

   Additional intelligent transportation system (ITS) programs to improve traffic flow on Pico and Robertson Boulevards with particular emphasis on the intersection of Pico and Robertson, should be included in the WLA TIMP list of eligible projects. Additional ITS programs should be considered on Beverwil between Pico and National and at the intersection of Beverly Drive and Pico Blvd. The immediate benefit is to reduce the amount of neighborhood "cut-thru" traffic. Some of these improvements would also support the proposed additional and improved bus rapid transit (BRT) service for Pico Boulevard already included in the WLA TIMP. **4**

4. The I-10 Freeway/Robertson Boulevard Interchange

   Caltrans and the City of Los Angeles Department of Transportation (LADOT) have been studying congestion relief and safety improvements to the I-10 Freeway/Robertson Boulevard interchange. These improvements are necessary and should be considered for inclusion in the WLA TIMP. **5**

5. Neighborhood Enhanced Network Improvements

   A number of Beverlywood residential streets are designated as part of the Neighborhood Enhanced Network (NEN) in the City's Mobility 2035 Plan. The objective of the NEN is to designate routes for improvements that calm traffic and improve traffic safety for pedestrians and bicycles. Those Beverlywood Streets listed in the Mobility 2035 NEN should be further studied for potential inclusion in the WLA TIMP. If found to be feasible and desirable, inclusion of these Beverlywood Streets in the WLA TIMP would make traffic calming improvements eligible for impact fee funding. **6**

6. Coordinated Student Mobility Programs **7**

With three campuses included in our boundaries, a coordinated "safe routes to school" program and coordinated bus program should be developed for inclusion in the WLA TIMP. Ride-share services such as the pilot "Ride Amigos" program initiated in the Brentwood Sunset Transportation Corridor should be considered for inclusion in the WLA TIMP. 7

.7. Local Bus Shuttles

The additional circulator/shuttle services described in the WLA TIMP should also include bus service connecting the Beverlywood neighborhood to the new Palms Expo Line Rail Station. Direct local bus connections between the neighborhood and Century City should be considered as well. 8

As President of the Beverlywood Homes Association, I request the City provide an additional 30 days for comment to seek further suggestions for mobility improvements by the BHA Board of Directors. The absence of the above described measures leads me to conclude that the proposed TIMP and DEIR are inadequate and I would therefore urge their consideration in a revised document. 9

We look forward to working with you on this important mobility plan and I thank you again for the opportunity to comment.

Sincerely,

Dina Glouberman, President
Beverlywood Homes Association

cc: Councilmember Paul Koretz, Fifth Council District
Jay Greenstein, Transportation Deputy, Fifth Council District

PC3 Dina Glouberman Beverlywood Homes Association 3/7/2016

Response to Comment PC3-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see responses to specific comments below.

Response to Comment PC3-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the CTCSP/WLA TIMP Amendment Project. The commenter expressed concerns about congestion on street segments that lie outside the Specific Plan boundaries and the desire to expand the Specific Plan boundaries to incorporate additional parcels east of the West LA TIMP's easterly boundary of Beverwil Drive and does not specifically comment on the adequacy of the EIR. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC3-3:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the Motor Avenue Cycle Track will further increase congestion along Motor Avenue and does not specifically comment on the adequacy of the EIR. The EIR analyzed an option for the Motor Avenue Cycle Track that would replace the existing bicycle lane on Motor Avenue; this option is not expected to result in a decrease in vehicular capacity along the roadway. The Draft EIR analyzes the diversion of trips associated with the Proposed Project into local neighborhoods based on project-specific traffic modeling (see Impact 4.6-3). The comment does not identify any specific issues with the EIR analysis or conclusions and provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC3-4:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No response is required because the comment does not address the adequacy of the EIR. The commenter is asking for additional improvements to be included in the project lists to be paid in part with the proposed updated fee. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC3-5:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No response is required because the comment is not addressed to the adequacy of the EIR. The commenter is asking for additional improvements to be included in the project lists to be paid in part with the proposed updated fee. Improvements can only be made within the Specific Plan boundaries, which does not include the interchange of Robertson Boulevard at I-10. No further response is required because the comment does not raise any new

significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC3-6:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No response is required because the comment is not addressed to the adequacy of the EIR. The commenter is asking for additional improvements to be included in the project lists to be paid in part with the proposed updated fee. Many Neighborhood Enhanced Network (NEN) improvements in the City's Mobility Plan 2035 are included in the Proposed Projects lists within the Specific Plan boundary. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC3-7:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No response is required because the comment is not addressed to the adequacy of the EIR. The commenter is asking for additional improvements to be included in the project lists to be paid in part with the proposed updated fee. Safe routes to school and school bus programs are not part of the Proposed Project. Transportation Demand Management programs, such as ride-share, are included in the Proposed Project lists within the Specific Plan boundary. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC3-8:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No response is required because the comment is not addressed to the adequacy of the EIR. The commenter is asking for additional improvements to be included in the project lists to be paid in part with the proposed updated fee. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC3-9:

The commenter's request for an extension of the public comment period is noted. The 60-day public comment period provided for the Draft EIR exceeds the requirements of CEQA (Pub. Res. Code Section 21091(a)). Regarding the measures identified by the commenter, please see responses to comments PC3-2 through PC3-8. As the commenter provides no substantial evidence that the measures proposed by the commenter would reduce any significant impacts identified in the Draft EIR, no further response is required.

Del Rey Residents Association
Since 1972

Post Office Box 661450 – Los Angeles, CA 90066
www.delreyhome.org

March 7, 2016

VIA U.S.P.S. and E-MAIL to westside2@fehrandpeers.com
Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N. Spring Street Suite 667
Los Angeles, CA 90012

Re: Comments on Westside Mobility Plan Draft EIR
Coastal Transportation Corridor Specific Plan

LA City EIR No. ENV-2014-1458-EIR
CPC Nos. CPC-2014-1456-SP
CPR-2014-1457-SP
State Clearinghouse No. 2014051070

Ladies and Gentlemen:

We applaud you for this effort to prepare this study, but we cannot be sure that we are commenting on the most recent interactive maps. 1

1. We agree that it is appropriate to charge a development impact fee on new residential construction. However, it our view that the calculation should not be based on the number of units built. A 2000 square foot loft unit has a different impact on mobility than does a three bedroom apartment, and yet both are counted as one unit. We would suggest using square footage instead. 2

2. Affordable units do have an impact on mobility. We believe that a distinction should be made between affordable projects that are built without a zoning variance, and projects that have been given a density bonus because the project includes affordable units. All projects that are more dense than they would be under the current zoning code should be expected to pay a heavier impact fee. The Housing and Community Investment Department is supposed to track and monitor the affordable 3

housing units, but we know of developers that got the density bonus but never registered the units. 3

3. We anticipate that as traffic becomes more congested, people increasingly will stay in their neighborhoods. Therefore, it is most important to us to improve the experience of moving around locally by bicycle and on foot. 4

4. We recommended introduction of a circulator within Del Rey so that residents could access local businesses more easily. The proposed Marina- Playa-Fox Hills circulator seems to follow the route of existing Metro bus lines (e.g. No. 108). If a circulator is going to be implemented, it should serve parts of the community that are not served by existing bus lines, i.e. along Inglewood Blvd. on weekends. The circulators should be smaller vehicles that run more frequently (like DASH buses). 5

5. We were quite gratified to see the proposed Streetscape Plan for Centinela Avenue between Washington Blvd. and Jefferson Blvd., i.e. all the way across Del Rey. It is correct to think about that street as a unit, even though jurisdiction is shared with the County of Los Angeles between the 90 freeway and Jefferson Blvd.. Centinela Avenue should be added to the list of "Great Streets" in Los Angeles, and we recommend designating a street tree for Centinela that would characterize Del Rey, rather than planting pine trees like the ones used in Playa Vista. 6

6. We have reviewed Appendix A – List of Transportation Projects, and we have the following comments regarding the segments that are in Del Rey:

    A. The draft interactive map that is on the website does show a pedestrian – cycling bridge across Ballona Creek near McConnell Avenue, but that is not included in the draft EIR. That bridge is a linchpin. Presently, the workers, students and residents in the area between Ballona Creek and Jefferson Blvd. have no safe way to reach Lincoln Blvd. or Inglewood Blvd., the two proposed enhanced bikeways that will cross the creek. A pedestrian-cycling bridge would offer a much safer way to cross the creek and get to a safe cycling route. 7

    B. We agree that a north south bicycle route like the one proposed for Beethoven Street is necessary, but we do not think a sharrow provides enough protection for cyclists that may be traveling to Santa Monica or Westwood. At a minimum, we need all of the purple lines that are proposed cycling routes to 8

be defined so that we know what kind of lanes are planned for the different locations. 8

C. We need to see details about the Culver Blvd. Corridor because our experience has been that with the many new multifamily buildings being built in the area, left turn pockets, crosswalks and signals are greatly needed. 9

D. We need traffic calming measures on Inglewood Blvd. and Centinela Avenue, particularly between Jefferson Blvd. and the 90 freeway. The signaling at the intersection of Inglewood Blvd. and Culver Blvd. needs to be reprogrammed so that there will be more protection for the many seniors, children and cyclists that cross there and the many vehicles that need to turn left from all four axes of the intersection. 10

E. We agree that Lincoln Blvd. between Fiji Way and Jefferson Blvd. needs to be widened and made available for multimodal transportation, particularly because Cedars Sinai Hospital is replacing Marina Hospital with a full-service medical facility. However, the presence of a Mobility Hub on Lincoln Blvd. should not be seen as an excuse for allowing high density "transit-oriented development." We know that zoning changes from industrial to residential are worth millions of dollars per acre, and we need to preserve the commercial/industrial zoning between Lincoln Blvd. and Alla Road. We also need to be sure that the Mobility Hub is nowhere near the Ballona Wetlands. 11

F. In addition to the full service Mobility Hub on Lincoln Blvd., we would like to see a bike sharing pod in Del Rey, perhaps at the intersection of Culver Blvd. and Centinela Avenue, where there is already a bike path on the Culver median. 12

G. In principle, we support the Multi-Use Paths along the Sepulveda Channel and the Centinela Creek, but they must be designed and monitored so they are not a magnet for homeless encampments and drug dealers. 13

H. We favor the use of modern technology to manage parking use, particularly in the areas that have been affected most by the development of Playa Vista Phase II. (Jefferson Blvd., Mesmer Triangle). 14

The comments above were prepared by our land use and planning committee and were voted on and approved at our board meeting on March 7, 2016. 15

Very truly yours,

DEL REY RESIDENTS ASSOCIATION

Elizabeth A. Pollock

By Elizabeth A. Pollock, President

PC4 Elizabeth A. Pollock Del Rey Residents Association 3/7/2016

Response to Comment PC4-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The interactive map referenced in the comment was developed as part of an initial visioning process for the Westside Mobility Plan and is not part of the Specific Plan amendments or CEQA process. The key components of the project list updates are contained in Chapter 3, *Project Description*, and illustrated in Figure 3-4 and Figure 3-5 of the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC4-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is requesting that the TIA fees for residential uses be assessed on total square footage rather than the number dwelling units. The comment does not identify any specific issues with the EIR analysis or conclusions and provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC4-3:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is stating that affordable housing units have an impact on mobility and does not specifically comment on the adequacy of the EIR. The Proposed Project does not propose any zoning or land use changes. Please see Chapter 3, *Project Description*, of the Draft EIR. The City recognizes that there are potential VMT benefits that additional affordable housing could provide and the City is currently studying the potential VMT difference between different housing types; this study is occurring outside the scope of the Proposed Project. However, the City does not currently have a metric quantifying VMT benefits from affordable housing as compared to market rate housing. Therefore, the VMT analysis of the Proposed Project used a conservative approach and used - market rate VMT assumptions for housing in the Plan area based on the City of Los Angeles Travel Demand Forecasting Model described in Section 4.6, *Transportation,* and Appendix F, *Model Development Report,* of the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC4-4:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the project. The commenter is stating that as congestion increases the ability to travel by walking and biking is important and does not specifically comment on the adequacy of the EIR. The Proposed Project lists contain a variety of projects to increase active transportation within the Specific Plan areas. No further response is required because the comment does not raise any new

significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC4-5:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is asking for transit circulator service as part of the Proposed Project. Shuttle/circulator service is included in the Proposed Projects lists. No response is required because the comment is not addressed to the adequacy of the EIR. The commenter is asking for additional improvements to be included in the project lists to be paid in part with the proposed updated fee. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC4-6:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter suggested that Centinela Avenue be added as a "Great Street" under Mayor Garcetti's Great Streets Initiative and also recommended that a street tree for Centinela Avenue be designated that would aptly characterize the Del Rey neighborhood and does not specifically comment on the adequacy of the EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC4-7:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that the cycling bridge across Ballona Creek near McConnell Avenue be considered in the project list updates and does not specifically comment on the adequacy of the EIR. The interactive map referenced in the comment was developed as part of an initial visioning process for the Westside Mobility Plan and is not part of the Specific Plan amendments or CEQA process. The City acknowledges that the methods used to achieve the City's transportation goals evolve overtime. As stated in the Draft Specific Plan Ordinances, the list of transportation improvement projects that may be funded by TIA Fees may be updated from time to time and, if so, will be assessed for purposes of CEQA compliance. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC4-8:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is asking for additional information on the NEN roadways included in the project lists (referenced as purple lines in the comment) and states that a sharrow does not provide enough protection for cyclists along Beethoven Street. Please see Section 4.6, *Transportation,* of the Draft EIR for discussion of impacts associated with public safety related to traffic. As indicated in Impact 4.6-7, implementation of the Proposed Project would not result in

adverse impacts regarding safety. The types of improvements that would be considered as part of the NEN are defined in the Mobility Plan 2035. The improvements are conceptual at this time, and no detailed designs or implementation plans have been developed for the individual components. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR, including that a sharrow cannot be designed and implemented in a safe manner. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC4-9:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is asking for additional details on the Culver Boulevard improvements contained in the project list and is stating that left-turn pockets, crosswalks and signals are needed. As described in the introduction to Chapter 4, *Environmental Impacts*, of the Draft EIR, the improvements and programs on the specific plan project lists are not entitled or constructed as part of this project. This is a specific plan that includes a list of improvements that are eligible to be built with the proposed mitigation fee. What ultimately gets built and when will be based on future policy decisions. The improvements are conceptual at this time, and no detailed designs or implementation plans have been developed for the individual components. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC4-10:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting traffic calming measures and traffic signal upgrades and does not specifically comment on the adequacy of the EIR, including how the Project will result in impacts to safety. Both of the types of improvements are reflected in the Proposed Project lists. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC4-11:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter expressed general concerns about locating a mobility hub near the Ballona Wetlands and expressed specific concerns that the "presence of a mobility hub on Lincoln Blvd should not be seen as an excuse for allowing high-density 'transit-oriented development'." While the Proposed Project's list of improvements includes mobility hubs, it has not defined exact locations for them within the Plan area. The improvements are conceptual at this time, and no detailed designs or implementation plans have been developed for the individual components. Conceptual maps of the Proposed Project's list of improvements provided in the Draft EIR (Figures 3-4 and 3-5 on pages 3-23 to 3-25 of the Draft EIR), illustrate example locations where mobility hubs could potentially be implemented. Furthermore, the Proposed Project does not propose any zoning or land use changes. Therefore, the Proposed Project would not result in higher density land uses. Please see Chapter 3, *Project Description*, of the Draft EIR. Please see Section 4.4, *Land Use and Planning,* of the Draft EIR for a discussion of impacts associated with land use and planning.

Additionally, the commenter expressed the need to preserve the commercial/industrial zoning between Lincoln Blvd and Alla Road. As mentioned above, the Proposed Project is not a land use plan and does not propose any zoning or land use changes, including rezoning of commercial or industrial lands. Furthermore, the City recognizes the importance of retaining jobs-producing lands, such as commercial and industrial, and has stated policies in the Palms-Mar Vista-Del Rey Community Plan (City of Los Angeles, 1998) to retain those lands, including:

> Objective 2-1: To conserve and strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services within existing commercial areas.
>
> Policy 2-1.2: Protect commercially planned/zoned areas from encroachment by residential only development.
>
> Policy 3-1.1: Designate and preserve lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing and similar uses which provide employment opportunities.

As discussed on pages 4.4-28 to 4.4-29 in Section 4.4, *Land Use and Planning,* of the Draft EIR, the Proposed Project would be consistent with, and supportive of, the intent of the Community Plans. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC4-12:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting a bikeshare station in Del Rey. No response is required because the comment is not addressed to the adequacy of the EIR. The commenter is asking for additional improvements to be included in the project lists to be paid in part with the proposed updated fee. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC4-13:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is in support of the multi-use paths on the project lists but wants to ensure they are designed and monitored appropriately. The impacts raised by the commenter related to criminal activity, such as drug use, are not foreseeable at this time but, rather, are based on argument and speculation. With respect to the concerns related to homeless encampments, to the extent that this is a socio-economic impact, this is not an impact for purposes of CEQA. Moreover, the comment is speculative and does not provide any substantial evidence regarding environmental impacts. The comment does not identify any specific issues with the EIR analysis or conclusions and provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC4-14:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that parking management through the use of modern technology is desirable and does not specifically comment on the adequacy of the EIR. While parking management strategies are included in the Proposed Project lists, the improvements are conceptual at this time, and no detailed designs or implementation plans have been developed for the individual components. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC4-15:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

FIX THE CITY

March 7, 2016

VIA EMAIL: Conni.Pallini-Tipton@lacity.org, westside2@fehrandpeers.com

LA Dept. of City Planning,

200 N. Spring Street Room 667

LA, CA 90012

RE: FINAL WLA TIMP COMMENTS ON DEIR

Please accept the following comments regarding the Westside Mobility Plan.

Summary

The prosperity of cities depends upon their livability: Good schools, safe parks, properly staffed police and fire, gridlock-free streets, clean air and sufficient water. In Los Angeles these vital public services are suffering in large part because the city has failed to invest in its crumbling infrastructure and has allowed development to outpace and exceed its capacity to provide essential services.

"We have the worst cut-through traffic of any area of the City. It's due to the fact that development has continued without proper infrastructure."

John Fisher, LADOT - WNC meeting: July, 2008

1

This project fails to reconcile key quality of life issues with actual impacts and other plans and policies of the city.

It further fails to address its own growth-inducing impacts and then fails to reconcile the growth inducing impacts against its stated objective: To reduce congestion.

The city cannot build its way out of its problems. It needs to invest in infrastructure first, before increasing density or implementing plans that induce increased density. 2

To quote page 51 of the nexus study: "The presence of essential public infrastructure and an attractive public realm increases demand and value of housing…" Diminished first-responder response times, deteriorating streets, deteriorating sidewalks, deteriorating water lines and soul-crushing traffic have all combined to decrease the attractiveness and livability in the project area. 3

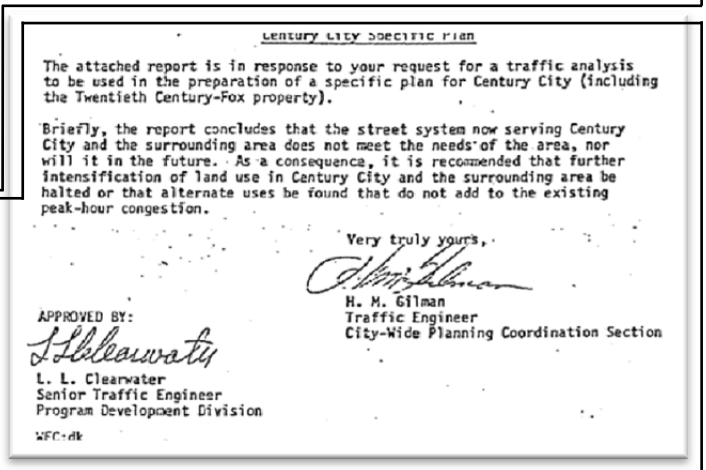
Transit-Oriented Development

TOD assumes that more people will come here no matter what and whether or not there is sufficient natural resources. TOD does not reduce trips, it increases trips as indicated by each piece of data submitted. What it does claim to do is increase trips by a lower rate than if development was focused further away from mass transit. Unfortunately, this logic is flawed as are any assumptions which flow from this conclusion. Increasing density around transit serves to create a barrier of density/congestion around mass transit which in turn serves as a mass-transit disincentive for those living further away. Combined with a marked lack of parking around mass transit, increases in mass transit use are inherently flawed. 4

It is important to note that the project does not claim to reduce car trips. It cleverly side-steps the issue by claiming a reduction in per-capita VMT. The EIR misleads the public and decision-makers by implying a 5

reduction of trips with the resulting reduction in emissions as well as other impacts. The method used to perpetrate this bait-and-switch approach is essentially that if the city can increase the denominator (population) at a faster rate than it increases the nominator (VMT), then the fraction of VMT/person will "go down" despite increased trips and increased congestion. 5

TOD density bonuses represent transportation-induced demand for the city's infrastructure, including but not limited to police, fire, schools, parks, libraries as well as transportation. Since several Metro and City EIRs have shown that roadway capacity is non-existent, and that ridership on mass transit has declined, the environmental impacts of added demand via TOD density bonuses are not adequately analyzed in this EIR nor can the transit/trip-reducing benefits be confirmed. The growth-inducing impacts of the TIMP must be disclosed and analyzed using assumptions consistent with recent Metro ridership findings as well as other infrastructure metrics. 6



Century City Specific Plan

The attached report is in response to your request for a traffic analysis to be used in the preparation of a specific plan for Century City (including the Twentieth Century-Fox property).

Briefly, the report concludes that the street system now serving Century City and the surrounding area does not meet the needs of the area, nor will it in the future. As a consequence, it is recommended that further intensification of land use in Century City and the surrounding area be halted or that alternate uses be found that do not add to the existing peak-hour congestion.

Very truly yours,

H. M. Gilman
Traffic Engineer
City-Wide Planning Coordination Section

APPROVED BY:

L. L. Clearwater
Senior Traffic Engineer
Program Development Division

WEC:dk

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Nothing highlight this flaw better than the December 4, 1975 traffic study shown here and produced by LADOT which discussed the capacity of the West LA street system.

Increased Density/Failure To Study Growth Inducing Impacts

As the project is actually a land use plan posing as a transportation plan, it fails to study or acknowledge growth inducing impacts of the plan including incentivizing affordable housing, TOD and multi-family dwellings. Loss of affordable housing within the City of Los Angeles will exacerbate longer commutes by automobile, the predominant transportation mode per the study. 8

Increased Density/Failure To Study Impacts On First Responders

The EIR fails to address the impacts of numerous sub-projects on first-responder access and response time. By way of example, the median along Pico creates a barrier for first responders and also consumes critical space in which emergency vehicles may travel. First Responder access will be substantially and materially impacted by at-grade rail crossings and, as mentioned above, by in-roadway barriers. 9

There is no analysis of the impacts of the TIMP projects on emergency response time for LAFD and for LAPD. Under the City CEQA Threshold Guide, such analysis is required (K-2, K-3.). Many of the intersections within the study area are at LOS E or F and therefore require an analysis of impacts on response time and staffing ratios – which fall below accepted metrics everywhere on the Westside. This analysis is also required by the CEQA checklist as well.

Flawed Assumption/Conclusion: Infrastructure Capacity For Multi-Modal Options

Multi-modal transportation requires the existence of adequate and safe transportation infrastructure, specifically roads, curbs, gutters and sidewalks. The EIR fails to acknowledge the failed state of the city's transportation infrastructure. As the infrastructure is inadequate per the city's own studies and infrastructure reports, any assumptions regarding increased multi-modal options and use that depend on the failed infrastructure is flawed.

CBS 2 KCAL 9 KNX1070 NEWSRADIO Los Angeles

"The 'infrastructure crisis' throughout the city is more widespread than the subject of streets, extending to sidewalks and storm water systems."
June 10, 2014

10

Flawed Assumption/Conclusion: Reliance On Failed Existing Infrastructure

The EIR states: "Because new development is not required to pay to improve traffic congestion caused by the existing traffic or by the cut-through traffic with destinations outside the Specific Plan area, the development impact fees represent only a fraction of the total regional improvement costs. As a result, LADOT has relied on the strategy of leveraging the collected development impact fees to secure outside transportation grants to help pay for the remaining costs, primarily by submitting grant applications in the Metro Call for Projects process." There are several flaws exposed by this section.

1. Future funding is not guaranteed and therefore cannot be relied on to mitigate impacts.
2. The city has admitted that congestion and cut-through traffic are issues though MP2035 specifically and admittedly will result in exacerbating both.
3. The statement confirms that extra-area traffic represents a substantial portion of the trips experienced by the area. There is inadequate study forming a nexus between intra-area trips v extra-area trips with regard to impacts.

11

Flawed Assumption/Conclusion: Increased Mass Transit Availability Equates To Increased Use

The EIR assumes that increased mass transit will yield increased ridership. The EIR fails to account for recent Metro statistics which show that ridership has decreased despite increased mass transit availability. (see http://www.latimes.com/local/california/la-me-ridership-slump-20160127-story.html)

12

Traffic Study Flaw: New Material Impact of the Expo At-Grade Rail Not Studied

None of the analysis included the impact on LOS, VHT, and VMT due to the Expo Line at-grade crossings. The EIR must address these impacts. As testing of the Expo line has progressed, a single gate closing has been seen to back traffic up to Pico on the north and to the 10 on the south.

13

Likewise, there is no analysis of the impacts of added congestion from MP 2035 on the Westside. The EIR must be revised and recirculated to address those impacts.

General Plan Framework Policy 3.3.2

The City Council approved the new General Plan in 1996 (re-adopted in 2001) including the implementation of its "crucial" new planning mandate, calling it "Policy 3.3.2." As testimony to the importance of this key feature, the City Council found that all other proposed alternatives to the adopted General Plan were infeasible because they did not contain the essential feedback mechanism – a policy that "*requires that type, amount, and location of development be correlated with the provision of adequate supporting infrastructure and services.*" Once the City adopted this feedback mechanism as a CEQA mitigation measure, it became obligated by law to use it as described[1]. In fact, the City called it "Mitigation Through Framework Policy."

> ***"The policy requires that type, amount, and location of development be correlated with the provision of adequate supporting infrastructure and services."***
>
> *– City of L.A. General Plan*

> *" ... The single biggest impediment [to maintaining infrastructure] was dedicated, continuous funding, sufficient to keep pace and address the massive backlog. The sources that we have depended on have been reduced, are restrictive, or have disappeared entirely... with infrastructure often taking a backseat"* CM Mitch Englander, LA Times *"L.A.'s 'Save Our Streets' Tax Increase Abandoned"*, June 11, 2014

The purpose of the new General Plan, and in particular Policy 3.3.2, was to provide the means to meter growth based on availability of infrastructure. Actually, the City stated it best when it said the new General Plan is to be used "so that allowable increases in density ... would not occur until infrastructure and its funding was available." (General Plan EIR, 1998)

Opposition brief of COLA Case#BS042964 (000206)

Fifth, even if all parts of the TIMP implementing program were dependent upon funding, and even if funding was the sole determinate of feasibility, the GPF and DEIR called for many implementing programs and mitigation measures other than those in the TIMP. A crucial aspect of the entire GPF was (1) its monitoring program which provides the methods by which substantive decisions on how and when to adjust densities based on updated information and progress reports reporting past performance and current status, and (2) its intent to modify the location and arrangement of different land uses to effectuate its various policies.

15

The Housing and Land Use Elements depend on Policy 3.3.2 as mitigation against development outpacing infrastructure.

Finally, dependence on future funding for a TIMP was a key issue during the litigation which followed the new General Plan/Framework. The following can be found in the city's brief during that case where it relied exclusively on Policy 3.3.2.

Opposition brief of COLA Case#BS042964 (000210)

Finally, petitioners attack as "infeasible by definition" (POB 12:1) the fifth alternative - the long range build out of the GPF use categories without the triggering mechanisms to tie infrastructure to new development. (If this was "infeasible by definition", then the inclusion of this definition in the DEIR which was circulated for four months in early 1995 should have triggered some sort of written objection during the public comment period from petitioners or others, for that matter.) This alternative was particularly helpful because it informed the City that a triggering mechanism should be included in the GPF so that allowable increases in density through community plan amendments would not occur until infrastructure and its funding was available.

The EIR fails to address consistency with Policy 3.3.2 and explicitly encourages increased density without addressing adequate infrastructure.

It also fails to address specific metrics for key mitigations, funding for key mitigations and funding for ongoing mitigations and maintenance.

[1] *(Public Resources Code §21081.6)*

MP2035

The EIR fails to explain or analyze how both the project and MP2035 can exist in the same universe. While one cites congestion as the problem, the other admits that it does not seek to address congestion. While one cites cut-through traffic as a problem, the other admits that it will create cut-through traffic. The EIR has failed to reconcile the two.

Specifically, the EIR states re congestion "The Westside of Los Angeles is a desirable place to live, work, and play, and therefore traffic congestion continues to be an issue." MP2035 admits to creating congestion and increasing cut-through traffic. 16

Additionally, the WLA TIMP states that street parking will not and MUST not be removed, but MP 2035 states that it might be removed on Westwood Boulevard. The TIMP and MP 2035 must be internally consistent.

Air Quality

The EIR is based on GHG models that were developed prior to Aliso Canyon. All modeling must be revised and compliance with state GHG regulations adjusted. The measurement of air quality impacts using VMT neglects to factor in the fuel used and increased emissions resulting from congested roadways. Therefore, the most accurate measurement with regard to GHG impacts would be to measure local congestion through LOS/VHT. Given the changed circumstances of Aliso Canyon, the GHG analysis must be revised and recirculated. Please see the attached comments on the CEQA Guideline change from LOS to VMT. 17

The greater the congestion, the more air pollution is produced by automobiles idling. Therefore, the added congestion from TOD projects and streetscape changes must be analyzed and addressed in the EIR. 18

Metro's EIR for the Expo Westside Segment concluded that rush hour conditions would exist throughout the day, and that there was greater increase(four-fold) in VHT than with VMT. CEQA requires the environmentally superior alternative to be used if it is feasible. Therefore, the analysis used in this EIR should measure VHT, not VMT. 19

Urban Decay: Loss of Street Parking

If street parking is removed, the environmental impacts of the removal on local businesses must be analyzed with regard to urban decay as well as the 30%+ added congestion of cars searching for parking and impacts on neighborhood streets. 20

Nexus Study Issues

The new fee structure discriminates against single family dwellings. There is no possible nexus study that could support the proposed fee structure. By way of example, ITE210 (SFD) generates 9.57 ADT while ITE820 (Retail) generates 42.94 trips/1000 sqft ADT. The proposed fee for residential is $9,944 while the proposed fee for retail is $15,000 per 1000sqft. The fee for retail uses is only 1.5 times the rate for a SFD even though the ITE rate is 4.5 times the trip generation of residential. 21

We also point out that the arbitrary use of the Avg. PM rate is improper as it discriminates against residential uses. Use of ADT would likely generate more appropriate fees. 22

The new fees will not and cannot touch existing deteriorating infrastructure upon which all new development is based. The study states:

> "Because new development is not required to pay to improve traffic congestion caused by the existing traffic or by the cut-through traffic with destinations outside the Specific Plan area, the development impact fees represent only a fraction of the total regional improvement costs. As a result, LADOT has relied on the strategy of leveraging the collected development impact fees to secure outside transportation grants to help pay for the remaining costs, primarily by submitting grant applications in the Metro Call for Projects process." 23

There is no certainty these remaining costs will or can be covered. As the project depends on the existing infrastructure, and the existing infrastructure has materially and substantially deteriorated, the plan cannot assume or count on benefits from that failed infrastructure. It is also likely that the fees will improperly be used to fix existing infrastructure since the "improvements" cannot be implemented without first repairing the existing infrastructure.

As a large percentage of local traffic is generated outside the area, the nexus is inaccurate as it applies full costs of the programs to local development. Non-residential uses are far more likely to have extra-area trips than residential uses. 24

If a development impact fee does not relate to the impact created by development or exceeds the reasonable cost of providing the public service, then the fee may be declared a special tax and must then be subject to a two-thirds voter approval. 25

The Supreme Court laid down a more refined test for the exaction of real property, ruling that in order for the government to require project-specific exactions, the government must demonstrate that (i) an essential nexus exists between the legitimate state interest and the exaction imposed by the city (as Nollan had held), and (ii) the nature of the exaction must be "roughly proportional" to the impact the project is creating. 26

Because the fee is not equally assessed across all uses, uses arbitrary and varying trip distances, and provides credits and incentives for some uses, it fails the AB1600 test. 27

Additional nexus issues:

1. The nexus study refers to Vehicle Trips as being automobile trips. Charging only automobile users of transportation infrastructure fails to acknowledge infrastructure consumed by other vehicles/modes. 28

2. The nexus study fails to take into account the nature of vehicles visiting residential v commercial/retail uses including the regular use of large delivery vehicles which disproportionately impact roadways. 29
3. The use of VMT fails to account for short trips taking a very long time due to congestion.
4. The use of VMT/capita is illusory as it can show artificial "improvements" if population increases faster than trips made by the new population. 30
5. The traditional nexus fee goal of reducing travel delay is far more consistent with the stated goal of reducing congestion.
6. The study does not account for increased delay caused by making mass transit inaccessible due to TOD.
7. The study overemphasizes bike use when it represents an exceptionally small percentage of trips and is forecast to continue to be an exceptionally small percentage of trips. 31
8. There is a fundamental inconsistency throughout the study as it simultaneously attempts to treat congestion as a problem while the EIR indicates congestion will get worse under the project. 32
9. Limiting parking is inconsistent with charging a fee that is based on an ITE trip rate and land use policy that mandates parking availability. It is also inconsistent with other statements in the EIR. 33
10. The study uses a self-validating Westside Travel Demand Forecasting Model that has neither been tested over time nor properly vetted by the public. 34
11. The growth rates are inconsistent with publically available census data.
12. The model appears to use old data including 2007 traffic counts and population values.
13. Metro's EIR for the Expo Westside Segment concluded that rush hour conditions would exist throughout the day. There is no evidence that the Westside can accommodate the increased density assumed by the study. If local roadways are LOS F/gridlock, it is illogical to assume increased traffic flow without increased capacity. It is then improper to take credit from one value which exceeds capacity to another that also exceeds capacity when neither are possible.
14. The note on page 39 of the study would appear to demonstrate the misleading nature of the study and EIR. It "clearly" states that "The same sociodemographic increases that apply to the Future Without Project conditions also apply to the Project conditions, resulting in an increase in the number of vehicle trips over Existing conditions." 35
15. Table 13 of the study shows increased VMT. It is only by increasing population faster than VMT that the study and EIR claim reduced VMT/capita. Given the infrastructure cannot support the increased population, this conclusion is flawed.
16. The data regarding average vehicle trip length is suspect given that it concludes that residential users are willing to travel further even though they would be travelling to and from the other uses.
17. The ability for LADOT to arbitrarily determine fees for a given project based on "appropriate data for input" to the model does not provide for a uniform and fair fee structure as required. 36
18. The prototypes do not include SFDs in various parts of the study area.
19. The proposed fees are far in excess of average fees presented for other cities in the study. Assumed growth rates are unlikely if development in the study area exceeds that of neighboring cities. 37

Comments on Table 2.1

Impact 4.1-1, 4.1-2: There is no substantial evidence that the transportation "improvements" will reduce VMT. There is a fundamental difference between creating access and actual use. As stated above, the metric of 38

VMT/capita is illusory as a measure of congestion if the number of people can be increased more rapidly than the VMT. 38

Impact 4.1-3: All air quality studies have been rendered moot by the Aliso Canyon leak. The conclusion is inconsistent with MP2035's congestion increases. 39

Impact 4.1-4: The conclusion is flawed as a result of the Aliso Canyon leak. The project cannot take credit for reductions achieved by other projects as this creates a false baseline. 40

Impact 4.2-1: The conclusions are inconsistent with those reached as part of MP2035. 41

Impact 4.3-1: The conclusion of reduced emissions based on VMT/capita is flawed. A finding of reduced emissions should be based on gross emissions not on a formula which would hide increased emissions so long as population rises faster than VMT. VHT would be the proper measurement for emissions as it accounts for short trips taking a very long time due to congestion. Further, The project cannot take credit for reductions achieved by other projects, including MP2035, as this creates a false baseline. 42

Impact 4.3-2: The nexus between availability of transportation options and use of those options is belied by recent Metro findings of reduced ridership. Further, increasingly deteriorated infrastructure creates a barrier for the public to safely explore other modes of travel. 43

Impact 4.4-1: There is a reasonable likelihood that the incentives offered for TOD and affordable housing, combined with the loss of exemptions for residential and favorable rates for non-residential uses and higher density uses, will result in changed future land use patterns. In fact, the EIR blatantly assumes so as it is providing incentives for certain land uses. 44

Impact 4.4-2: As stated above, the growth-inducing impacts of the project including but not limited to development incentives stand in direct conflict with the General Plan, General Plan Framework, Housing Element and Land Use Element. The goal of reducing congestion and cut-through traffic is in direct conflict with the Transportation Element (MP2035). 45

Impact 4.5-1: Numerous findings are inconsistent with those made in the adopted MP2035 EIR. 46

Impact 4.6-2: This finding is inconsistent with findings elsewhere in the EIR. To be clear, it states that congestion WILL increase. The EIR therefore acknowledges that it is NOT achieving its objective. Further, LADOT has stated publically numerous times that no more capacity improvements exist in the West L.A. area. The stated mitigation is inconsistent with LADOT public statements. 47

Impact 4.6-3: This finding is inconsistent with the objective of reducing congestion. The proposed mitigation is not specific enough to provide any certainty of mitigation, nor is funding assured or provided for such mitigations. 48

Impact 4.6-4: This finding is inconsistent with the objective of reducing congestion. This finding is also inconsistent with the statement above that there is no conflict with other regulations etc as listed in 4.4-2. 49

Impact 4.6-5: There is no substantial evidence to support this finding. This is especially true for impacts on fire stations 37, 92 and 59 due to physical changes proposed. 50

Impact 4.6-7: This finding fails to address the inability for deliveries to be made using the center lane of roadways such as Westwood and Pico. 51

Impact 4.6-8: This finding is nonsensical. Not only is there no substantial evidence to support the finding, substantial evidence exists which shows reduced transit usage. Further, there can be no statement of consistency with non-existent metrics. The finding of reduced vehicle trips (as opposed to VMT/capita) is not supported by the EIR which cites increased congestion and trips. Additionally, the EIR is misleading in claiming reduced VMT for reasons stated above. 52

Additional Issues

- The EIR fails to study impacts of/interactions with the Expo Corridor Transit Neighborhood Plan. There are substantial questions as to improper segmentation occurring between the two. 53
- There is no substantial evidence that shows that ATCS improves capacity at intersections which are impacted from both directions. 54
- The EIR failed to study capacity decreases on BRT arterials. 55
- The EIR failed to study the impact of transit on Westwood, especially in combination with MP2035. 56
- The EIR failed to study the impacts of the Olympic Boulevard Operations on FS59 operations. 57
- The Neighborhood Protection Program is inconsistent with the fact that the NPP section in LADOT has been effectively eliminated. 58
- The EIR should study the impacts and opportunities of autonomous vehicles. 59
- The Santa Monica Boulevard Transit Parkway was envisioned as a multi-modal highway yet its implementation was far different than proposed. 60
- Intersection improvements are already accounted for in the existing TIMP and as part of other development agreements. The current project cannot take credit for mitigations provided for by other projects. 61
- The CCNTMP is under constant attack, most recently by LADOT when it approved a traffic study for the City School (included by reference). 62
- The EIR includes MP2035 by reference (see page 26 of the fee study) despite being inconsistent with MP2035. 63
- The proposed streetscape plans are likely inconsistent with reducing congestion and will also likely impact first responders' ability to reach the public due to additional barriers and reduced road capacity. 64
- There is no study of the impact on the CCNTMP based on proposed "improvements" to Motor Avenue. 65
- The study fails to address the impacts of increased water use from landscaping and increased development. 66
- The study fails to address impacts of an increased homeless population which may be exacerbated by the project. 67
- The study fails to address impacts on policing which would result from the project. 68
- The EIR fails to address the simple fact that the city regularly raids the Special Parking Revenue Fund which should be used to pay for increasing parking options. This would in turn reduce parking-related trips. Increasing the price for parking will only serve to tax customers of local businesses where 69

insufficient parking has been provided. This in turn will make those businesses far less attractive to customers. 69

- It is unclear where MP2035 ends and the Westside Mobility Plan begins. Far from simply being a TIMP fee proposal, this project appears to revisit many of the same issues covered by MP2035 – yet comes to different conclusions. 70
- The streetscape plan states that "On all Westside Boulevard street segments, full-time on-street parking, without restrictions during peak commute periods should be maintained as it benefits both businesses and residents…" This is inconsistent with other parts of the plan which seek to reduce parking and/or charge ever-increasing fees for parking. 71
- The EIR fails to evaluate queue overflows which occur along Pico east of the 405. 72
- The EIR fails to account for ongoing maintenance for the improvements. Absent a commitment to maintain improvements, they will deteriorate and lose value over time. 73
- The demand model contains errors such as failing to identify peak period restrictions on Westwood Boulevard. 74
- The provided alternatives fail to encompass a reasonable range of alternatives, specifically those alternatives that focus on reduced VHT. 75
- The EIR failed to analyze impacts on the Century City North and South Specific Plans. 76

We hereby incorporate our comments provided on MP2035 into the record for the Westside Mobility Plan. 77

Sincerely,

Laura Lake

Laura Lake, Ph.D.

FIX THE CITY

Laura.Lake@gmail.com

310-317-7400 Message or fax

Attachment: Fix the City Comments on CEQA Guideline (February 29, 2016).

PC5 Laura Lake FIX THE CITY 3/7/2016

Response to Comment PC5-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project.

The commenter does not provide substantial evidence regarding the project's impacts on quality of life. The project's consistency with other City plans and policies is addressed in Section 4.4, *Land Use and Planning,* of the Draft EIR. Please see Response to Comment PC5-8 regarding growth inducing impacts.

The comment incorrectly cites congestion reduction as an objective of the Proposed Project. The objectives of the Proposed Project are listed on page 3-5 to 3-13 of the Draft EIR; there is not an objective related to reducing congestion. Please see Master Response 1 regarding Project Objectives.

The Proposed Project does not propose the construction of any development and would not increase density or otherwise induce density. The project would not alter any zoning or General Plan land use designations or otherwise allow for development that exceeds existing zoning requirements or General Plan designations. The Proposed Project is not a land use plan; rather, the Proposed Project would update TIA fees to provide a mechanism to fund transportation-related infrastructure improvements.

Response to Comment PC5-3:

This comment is noted and will be forwarded to the decision-makers for their consideration. As discussed in Impact 4.6-5 the Draft EIR, "while the project would impact segment-level LOS, there is not a direct relationship between predicted travel delay and response times" (page 4.6-62 to 4.6-63). A discussion of the threshold used to evaluate emergency access impacts can be found on page 4.6-46 to 4.6-47 of the Draft EIR. The Proposed Project would update TIA fees to provide a mechanism to fund transportation-related infrastructure improvements, including alternative modes of transportation. The project would not address water supply infrastructure. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC5-4:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is stating that TOD does not reduce trips and that increasing density around transit services creates a barrier around the transit stations and makes transit less desirable for those living further away. The Proposed Project does not propose any zoning or land use changes and is not proposing new TOD uses in the Specific Plan areas. No further response

is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-5:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is stating that the project does not claim to reduce car trips and instead claims to reduce VMT per capita. As described in Section 4.6, *Transportation,* of the Draft EIR, VMT, VMT per capita, and vehicle trips, has been provided for informational purposes only and impacts are based on current CEQA and City guidelines (see Impacts 4.6-2 and 4.6-4 related to level of service impacts anticipated with the Proposed Project). The *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, as published by OPR in January 2016, identifies efficiency measures of VMT (such as vehicle miles traveled *per capita* or *per service population*) as potential future CEQA metrics. The City, in response to this guidance from the State, has analyzed both VMT and VMT per capita for the Proposed Project and has provided this as additional information in the EIR. Data related to vehicle trips, VMT, and VMT per capita changes anticipated with the Proposed Project are presented in Section 4.6 of the Draft EIR in Tables 4.6-23 through 4.6-25. As discussed in the introduction to Chapter 4, *Environmental Impacts*, of the Draft EIR, the EIR analyzes future conditions, including background growth, with project implementation (referred to as "Future with Project" conditions), and compares these conditions to existing conditions in 2014. As explained in Section 4.6, VMT per capita was reported to isolate the effects of the project from land use changes that would occur between existing and Future with Project conditions. In addition, total VMT under Future with Project conditions was compared to a Future without Project scenario. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-6:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is stating that the EIR does not account for the impacts of TOD density bonuses. The Proposed Project does not propose any TOD density bonuses, zoning changes, or land use changes. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-7:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is referencing a 1975 traffic study produced by LADOT that discusses the West LA street system. Please see Section 4.6, *Transportation,* of the Draft EIR for an overview of the transportation system in the study area under existing conditions in 2014. The existing conditions analysis reflects the current capacity of the roadway network and acknowledges the current congestion in the study area. Please also see response PC5-8 regarding growth inducing impacts. No further response is required because the comment does not raise any

new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-8:

Introduction

The comment that the Proposed Project is a land use plan is incorrect. The Proposed Project would not result in any changes in General Plan land use designations or zoning classifications. Rather, the Proposed Project consists of amendments to two Specific Plans that result in updates to two existing transportation mitigation fee program adopted pursuant to the Mitigation Fee Act (Gov't Code Sections 66000, et seq.) and consistent with a mitigation fee program, include impact fees, fee credits, a list of improvements or categories of improvements that the fees are intended to be used for, and administrative policies and procedures to implement the fee program. The EIR would not entitle or otherwise approve any of the transportation improvements identified in the fee program. Additionally, the amended Specific Plans would not approve or, in fact, provide any zoning or development standards or regulations for any new development, other than the adoption of a program to exact fees and mitigation. The EIR analyzed the reasonably foreseeable indirect effects of the build out of the mitigation fee improvements. For impact analyses that relied on population, housing and employment data (such as transportation impacts), as discussed in the introduction to Chapter 4, *Environmental Impacts*, of the Draft EIR, the analysis in the EIR was based on regional population, housing, and employment growth projected to occur in the future by SCAG. This growth is forecast to occur with or without implementation of the Proposed Project. The Proposed Project would not change the amount or type of growth anticipated to occur, nor has the commenter provided any substantial evidence that the Project would result in induced growth. Rather, the Proposed Project would increase mobility options within the CTCSP and WLA TIMP areas as growth continues.

Affordable Housing Credit

The potential for the Proposed Project to result in growth inducing impacts through the TIA fee credits for the provision of affordable housing was evaluated in the Nexus Study (which was included in the Draft EIR as Appendix B). Specifically, Appendix E of that appendix considered the potential economic impact of an update to the TIA fee programs associated with the CTCSP and WLA TIMP, including the fee credits for affordable housing. The economic impact study concluded that the TIA fee credits for the provision of affordable housing would not change the broader fundamental economics of new development. In other words, the fee credit, alone, would not provide a great enough incentive so as to change the likelihood that affordable housing would be developed or not developed in the study area. As concluded in the study, a variety of factors affect the financial performance of new development, including location and density bonus incentives, among other factors.

Regarding the statement that loss of affordable housing within the City of Los Angeles will exacerbate longer commutes by automobile, the Proposed Project would not result in a loss of affordable housing. The proposed transportation improvements would all be located within existing roadway right-of-ways; no property would be acquired as part of the Proposed Project. Rather, the Proposed Project includes fee credits for affordable housing.

TOD Credit

Consistent with AB 3005, the proposed amendments to the CTCSP and WLA TIMP include a new TOD credit. As described in the draft Specific Plans, development near transit will still be subject to the TIA fee; the TOD credit allows for a 5% or 10% reduction in the TIA fee obligation for transit oriented developments near LRT or BRT stations that meet specific criteria outlined in the Specific Plans. As noted above, the Proposed Project would not entitle any new development, including TOD, nor would the Project modify zoning classifications or land use designations to specifically allow TOD. Additionally, the argument that the credit would incentivize new development is highly questionable and is not supported by substantial evidence, as the program would also eliminate existing exemptions on residential uses and some commercial uses. Therefore, the Proposed Project would not induce growth as a result of the TOD credit.

Finally, the comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(c)).

Response to Comment PC5-9:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is stating that projects impacts to emergency response times have not been analyzed in the EIR. Please see Section 4.6, *Transportation*, pages 4.6-46 to 4.6-47, of the Draft EIR for the significance criteria applied for emergency access impacts for the Proposed Project.

The comment is also stating that the potential medians on Pico Boulevard could impede access along the roadway. Median placement would be studied further with specific locations and dimensions to be determined in consultation with LADOT and BOE. Medians are one component of the Streetscape Plans intended to improve pedestrian safety along Westside roadways. The pedestrian enhancements that could be implemented primarily consist of infrastructure improvements within the sidewalk and street right-of-way. These enhancements would reduce risks to pedestrian safety. Typical pedestrian enhancements include way-finding, street trees, pedestrian-scaled street lighting, enhanced crosswalks at all legs of the intersection, automatic pedestrian signals, reduced crossing length (e.g., bulb-outs, median pedestrian refuges), wider sidewalks (greater than 15 feet where feasible), and specialty paving and seating areas as funding is available. As described in the introduction to Chapter 4, *Environmental Impacts*, of the Draft EIR, the improvements and programs on the specific plan project lists are not entitled or constructed as part of this project. This is a specific plan that includes a list of improvements that are eligible to be built with the proposed mitigation fee. What ultimately gets built and when will be based on future policy decisions. As discussed in Section 4.6, *Transportation,* of the Draft EIR under Impact 4.6-5, the Los Angeles Fire Department actively participates in the design of specific roadway changes to ensure adequate fire/emergency access is maintained and can recommend that no changes or alternative changes be undertaken if fire and emergency access are impacted.

The comment also expresses concerns of new at-grade rail crossings. However, this project does not propose any new at-grade rail crossings.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-10:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment states that assumptions regarding increased multi-modal options that depend on failed infrastructure are flawed, however, the commenter is not clear about the specific assumptions in the Draft EIR to which the comment is referring. The comment does not provide any evidence that the current state of infrastructure would alter the assumptions or analysis in the Draft EIR.

The objectives of the Proposed Project are identified in Chapter 3, *Project Description,* of the Draft EIR. As indicated in the Draft EIR, the primary objectives of the project are related to the provision of transportation options that accommodate multiple modes of travel, while decreasing auto trips and VMT per capita, through updates to the Specific Plans and the TIA fees that are assessed through these plans. It is not the intent of the Proposed Project to address the state of the roadways, curbs, gutters, and sidewalks. Please see Master Response 1 regarding Project Objectives. The commenter provides no substantial evidence linking the objectives of the Proposed Project with the current state of the transportation infrastructure in the Westside or that, otherwise, assumptions used in the EIR analysis are not supported. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-11:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter raises various issues with the proposed fee program, including stating that the fee program cannot be relied upon to fully mitigate future transportation impacts due to existing deficiencies, regional through traffic, and uncertain funding. As discussed in the Nexus Study (which was included in the Draft EIR as Appendix B), impact fee programs cannot be used to fund maintenance to correct existing deficiencies. The Nexus Study also states the fee program is expected to fund approximately 35 percent of the project costs. The comment does not identify any specific issues with the EIR analysis or conclusions and provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).”

Response to Comment PC5-12:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding declining transit ridership trends. According to the American Public Transportation Association (American Public Transportation Association, 1990-2015), national transit ridership trends indicate that ridership on all types of rail (heavy rail, light rail, and commuter rail) is growing. In 2015, 11% more rail trips of all types were taken than in 2008. Bus ridership over the same period has decreased, but is decreasing more slowly (-9%) than rail ridership is growing. Based on a study recently published by Metro (Metro, 2016), transit ridership in Los Angeles County is evolving similarly to the national trend: Metro bus ridership

has decreased and rail ridership has increased. Since 2008, bus ridership in Los Angeles County since has decreased at a rate similar to the national trend (12% in Los Angeles compared to 9% nationwide). Rail ridership has grown much more quickly in Los Angeles County than in the United States as a whole (27% in Los Angeles compared to 11% nationwide). When evaluating changing trends in transit ridership, it is important to examine multi-year periods. Transit ridership on both bus and rail fluctuates up and down from year to year, and one-year comparisons may suggest changes in ridership trends that do not bear out over a longer period. For example, ridership on the Red/Purple Line decreased from the previous year on two occasions between 2008 and 2015, but ridership on the line over the entire period is up 9%. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).”

Response to Comment PC5-13:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the EIR does not consider the impacts of the Expo Line at-grade crossings. The EIR analyses assumes that Expo Phase II is in operation under Future without Project and Future with Project conditions. As explained in Section 4.6, *Transportation,* and in the *Model Development Report* contained in Appendix F of the Draft EIR, the Expo Line, as built, is included in the Westside TDF model. As discussed in Section 4.6, the transportation impact analysis was based on a volume-weighted average of the V/C ratios for the analyzed roadway segments in the Specific Plan area (see Impact 4.6-2) and reflects existing transportation conditions and planned transportation improvements per the SCAG 2012-2035 RTP/SCS, such as Expo Phase II. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).”

Response to Comment PC5-14:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the impacts of MP 2035 have not been considered. MP 2035 is considered as part of the cumulative impact analysis. Cumulative impacts are described in Chapter 5, *Other CEQA Considerations,* of the Draft EIR (see pages 5-2 and 5-3 for a discussion of MP 2035 and Section 5.1.2.6 for a discussion of cumulative impacts related to transportation and traffic operations).

Response to Comment PC5-15:

The commenter suggests that the Proposed Project encourages increased density without addressing adequate infrastructure and that the EIR fails to address mitigation and mitigation funding. The commenter specifically argues that the CTCSP/WLA TIMP Amendment Project is inconsistent with Framework Element Land Use Policy 3.3.2, which states that population, development, and infrastructure and service capacities with in the City shall be used to determine the need and establish programs for infrastructure investments, among other things.

Mitigation

The comment is not clear on which mitigations are being referenced, but in the case of the Proposed Project, the Proposed Project itself is a funding mechanism to implement transportation improvements that intend to mitigate the impacts of new development. The Draft EIR describes the Proposed Project in Chapter 3, *Project Description,* pages 3-1 to 3-31. The Proposed Project updates two existing development impact fee programs and identifies an updated list of transportation improvement projects to be funded with those fees.

Plan Consistency

As discussed on pages 4.4-25 to 4.4-30 of Section 4, *Land Use and Planning*, of the Draft EIR, the CTCSP/WLA TIMP Amendment Project is consistent with state, regional, and local plans and polices, including the City's General Plan. The City asserts that the Proposed Project is consistent with the Framework Element of the General Plan (City of Los Angeles, 2001), including but not limited to Land Use Policy 3.3.2, because the primary purpose of the CTCSP and WLA TIMP Specific Plans is to plan for and fund future transportation infrastructure improvements.

The Proposed Project represents planning for transportation infrastructure investment to accommodate anticipated growth, as is directly called for in the Framework Element's Land Use Policy 3.3.2. A primary objective of the proposed CTCSP/WLA TIMP amendments is to provide a mechanism, taking into consideration current land use trends and infrastructure needs, for funding transportation improvements that mitigate the impacts of new development by increasing mobility options within the Westside. The CTCSP and WLA TIMP are transportation impact fee programs that require new development to contribute a fair-share portion of the cost of future transportation improvements on the Westside. A nexus study was completed in order to establish the relationship, referred to as the "nexus," between new development expected to occur and the need for new and expanded major public facilities. After establishing the nexus, the TIA fees to be levied for each land use in the areas of benefit are calculated based on the proportionate share of the total facility use for each type of development. The Nexus Study is included in Appendix B of the Draft EIR.

Density

The transportation improvements identified in the Proposed Project facilitate movement within a mature urban area as it evolves. The CTCSP/WLA TIMP Amendment Project, in and of itself, does not cause density. The project does not change the amount of growth nor where it is anticipated to occur. The Proposed Project seeks to improve transportation infrastructure on the Westside of the City given projected growth through the year 2035. Future development will occur with or without the Proposed Project; The CTCSP and WLA TIMP establish impact fee programs such that when new development *does* occur, it must pay a TIA Fee. The Proposed Plans accommodate anticipated infill growth as envisioned in the General Plan Framework by providing funding needed to implement transportation infrastructure improvements. Neither the updated TIA Fee program nor the updated list of multimodal transportation improvements would change, or encourage changes in, land use density. Please see Section 4.4, *Land Use and Planning,* of the Draft EIR for a discussion of impacts associated with land use and planning.

Conclusion

Based on the above, the commenter's arguments associated with the Framework Element, mitigations, and the adequacy of the EIR are not supported by facts. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State

CEQA Guidelines Section 15204(c)). However, to the extent these comments raise policy arguments they will be forwarded to the decision-makers for their consideration prior to taking any action on the CTCSP/WLA TIMP Amendment Project.

Response to Comment PC5-16:

The relationship between MP 2035 and the Proposed Project is described in Chapter 5, *Other CEQA Considerations,* of the Draft EIR. As described therein, MP 2035 provides the framework for future planning documents, such as the proposed amendments to the CTCSP and WLA TIMP, which take a closer look at the transportation system in specific areas of the City and recommend more detailed implementation strategies to realize MP 2035. It is misleading to state, as the commenter does, that "one" (the commenter is unclear as to which project she is referring to) cites congestion and cut-through traffic as problems, whereas "the other" (again, the commenter is unclear as to which project she is referring) does not seek to address congestion and would create cut-through traffic. Both EIRs discuss existing congestion (see MP 2035 Draft EIR, Existing Transportation Conditions, pages 4.1-14 and 4.1-15, and CTCSP/WLA TIMP Specific Plans Amendment Project Draft EIR, Section 4.6.3, Existing Setting, page 4.6-9, and Tables 4.6-13 and 4.6-14, pages 4.6-51 and 4.6-52). Neither the MP 2035 EIR nor the Draft EIR for the Proposed Project include addressing congestion as a project objective, and both emphasize the need to increase mobility options. Moreover, both EIRs conclude that their respective projects could result in traffic congestion in some locations and could exacerbate diversion of trips onto adjacent parallel routes in some instances (see MP 2035 Draft EIR page 4.1-56 and CTCSP/WLA TIMP Specific Plans Amendment Project Draft EIR page 4.6-54).

Regarding parking on Westwood Boulevard, as noted in Table 3-5 of the Draft EIR, specific transportation improvements associated with the Proposed Project would be designed so as not to require the removal of parking on Westwood Boulevard. This design feature was added to the project specifically to respond to concerns raised by the public. As stated above, although MP 2035 provides a framework for transportation planning at a citywide level, plans such as the Proposed Project recommend more detailed implementation strategies at a sub-regional level. Therefore, the difference between the two documents with respect to parking on Westwood Boulevard represents a refinement to the City's plans, not an internal inconsistency between the two documents.

Response to Comment PC5-17:

The comments on recently proposed changes to the State CEQA Guidelines are noted, and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project.

Regarding the comments pertaining to Aliso Canyon, it appears that the commenter is claiming that greenhouse gas models have been rendered obsolete by the Aliso Canyon natural gas (primarily methane) leak. The models used to estimate emissions of GHG from Proposed Project sources were the California Air Resource Board's CalEEMod and EMFAC models. The model algorithms are used to estimate GHG emissions from sources associated with the Proposed Project, primarily motorized vehicles and equipment. The emissions estimates from these models are based on vehicle and equipment fleet characteristics (e.g., horsepower, speed, hours of operation, and fuel type) analyzed under the Existing Conditions, Future Without Project, and Future With Project scenarios, and are not affected by the emissions of other sources. Therefore, the GHG emission estimates presented in Section 4.3, *Greenhouse Gas Emissions*, and Appendix D, *Air Quality/Greenhouse Gas Emissions*, of the Draft EIR are not affected by the Aliso Canyon leak.

With regard to the potential impacts on plans or policies related to climate change and GHG emissions, the Southern California Gas Company has pledged to mitigate the environmental impacts of the leak, and the California Air Resources Board has drafted a Mitigation Program (CARB, 2016) to specifically offset the impacts of the Aliso Canyon methane leak. Their draft plan focuses on (i) generating significant and quantifiable reductions in methane emissions from the agriculture and waste sectors, (ii) promoting a more sustainable energy infrastructure by promoting energy efficiency and decreasing reliance on fossil fuels, and (iii) addressing emissions from methane "hot spots" not presently targeted under federal, state, or local laws. These emission reduction projects will take some time to be fully developed, and do not directly impact the Proposed Project elements. The GHG analysis presented in the Draft EIR fully complies with applicable GHG emission reduction policies that exist today, and it would be inappropriate to speculate how the future Aliso Canyon Mitigation Program might affect existing policies that are specific to the Proposed Project. Therefore, the GHG analysis in the Draft EIR is not required to be revised or recirculated.

Please see Master Response 2 regarding the impact of congestion on the emission calculations associated with the Project.

Response to Comment PC5-18:

Please see Master Response 2 regarding air quality impacts associated with idling. The air quality analysis provided in Section 4.1, *Air Quality,* of the Draft EIR addresses future conditions with the Proposed Project in 2035. This analysis considered both the future implementation of transportation improvements associated with the Proposed Project, including streetscape improvements, as well as future background growth in traffic from development in the region that is not related to the Proposed Project. As explained in Section 4.6, *Transportation,* of the Draft EIR, future conditions in 2035 were based on forecasted growth projections included in the SCAG 2012-2035 RTP/SCS, as verified by the Los Angeles Department of City Planning.

Response to Comment PC5-19:

The comment regarding the findings of Metro's EIR for the Expo Westside Segment pertaining to VMT and VHT is noted. Please see Master Response 2 regarding the methodology used in the CTCSP/WLA TIMP Specific Plans Amendment Project Draft EIR for evaluating impacts associated with air quality. As noted in that response, the Draft EIR accounted for impacts associated with congestion by considering traffic volumes by speed. The reference in this comment to the environmentally superior alternative is unclear and misleading. It should be noted that, although the State CEQA Guidelines require that an EIR identify an environmentally superior alternative (State CEQA Guidelines Section 15126.6(e)(2)), CEQA does not require the lead agency to select the environmentally superior alternative.

Response to Comment PC5-20:

This comment implies that the removal of street parking would result in the loss of local businesses, resulting in urban decay. The commenter does not provide substantial evidence that the removal of street parking in some locations would result in the loss of local businesses, or that such a loss, were it to occur, would be of sufficient magnitude to result in urban decay. As discussed in Section 4.4, *Land Use and Planning,* of the Draft EIR, implementation of some of the transportation improvement projects, such as center running BRT, could result in the removal of some on-street parking. Such removal, if warranted, would be studied further before implementation by the implementing agency

(e.g., Metro). This Proposed Project alone would not cause the construction of BRT or the removal of parking. As stated in Chapter 3, *Project Description*, of the Draft EIR, the Proposed Project would not, itself, entitle or otherwise approve any transportation projects. With that said, the EIR did analyze what is known of the project at this time and did not identify an impact from the potential loss of street parking from the project. Off-street parking and street parking on adjacent streets would not be affected, and the proposed loss of on-street parking is not anticipated to permanently prevent or disrupt access to surrounding land uses. Based on observations of City planning and LADOT staff, where parking has been removed in the City, it is expected that any increase in VMT associated with people driving farther to find parking or to seek an alternate destination with more convenient parking would typically be off-set by a reduction in vehicle trips due to other people who are aware of constrained parking conditions in a given area. The Proposed Project would generally be synchronized with a greater availability of parking management services, such as online parking applications (apps) that will identify, in advance, available parking supply in a given area. In addition, car share and ride share services are demonstrating an attractive mobility option that improves access to destinations without the necessity for parking. Further, existing and proposed transit improvements would provide alternative methods of accessing businesses. Hence, the change in parking availability would not be expected to result in the closure of local businesses and would not lead to urban decay.

The commenter's statement that the Proposed Project would result in a 30%+ increase in congestion due to cars searching for parking is noted. The commenter does not provide substantial evidence for this statement. Secondary impacts associated with the removal of street parking, including increased VMT associated with people driving farther to find parking or seeking an alternate destination with more convenient parking, were addressed in Section 4.6, *Transportation,* of the Draft EIR (see section on secondary impacts to transportation on pages 4.6-68 to 4.6-69). As noted in that discussion, removal of parking due to the Proposed Project would not be expected to result in impacts to traffic congestion based on the potential off-setting benefits from other components of the Proposed Project. Moreover, the Proposed Project lists include a number of trip reduction programs that would help to reduce the need for vehicular travel and better manage the supply of parking in the project area. Hence, any secondary environmental impacts which may result from a shortfall in parking are anticipated to be minor and other transportation analyses reasonably address potential secondary impacts. Therefore, with implementation of the Proposed Project, the traffic impacts related to parking would be less than significant.

Response to Comment PC5-21:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the fee structure discriminates against single family units. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-22:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the use of daily trip generation rates instead of PM peak hour rates would be more appropriate when calculating the impact fees. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-23:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the fees cannot be used to fund existing transportation deficiencies as already acknowledged in the Nexus Study. The Nexus Study is included in Appendix B of the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-24:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that all project costs are being allocated to local development in the fee program, which is inaccurate. As discussed in the Nexus Study, the fee program is expected to fund approximately 35 percent of the project costs. The Nexus Study is included in Appendix B of the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-25:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding an impact fee in comparison to a special tax that requires voter approval which is described in the Nexus Study. The Nexus Study is included in Appendix B of the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-26:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the requirements for impact fees which are also described in the Nexus Study. The Nexus Study is included in Appendix B of the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-27:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the requirements for impact fees which are also described in the Nexus Study. The Nexus Study is included in Appendix B of the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-28:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is stating that the impact fees only consider automobile trips. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-29:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is stating that the impact fees do not consider the delivery vehicles generated by retail uses. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-30:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the performance measures of VMT that are used in the Nexus Study. The Nexus Study is included in Appendix B of the Draft EIR. The VMT portion of this comment is similar to, and raises the same issues as those raised in, comment PC5-5; please refer to Response to Comment PC5-5. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-31:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is stating that the study does not account for increased delay caused by making mass transit inaccessible due to TOD. The Proposed Project does not propose any zoning or land use changes and is not proposing new uses near transit in the Specific Plan areas. The comment also states that the study overemphasizes bike use. The bicycle improvements considered in the project lists are consistent with the vision of Mobility Plan 2035. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-32:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is stating that the study is inconsistent because it attempts to treat congestion as a problem while stating that congestion will get worse under the project. Please see Master Response 1 regarding Project Objectives. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-33:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is stating that limiting parking is inconsistent with a fee based on ITE rates and land use policies that mandates parking, as well as inconsistent with other statements in the EIR. The Proposed Project does not include parking regulations for new development. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-34:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Section 4.6, *Transportation,* of the Draft EIR for a summary of the development of the Westside TDF Model as well as the *Model Development Report* contained in Appendix F of the Draft EIR. The report shows that the model meets the validation thresholds established by the California Transportation Commission, and that the refinements made to the model comply with the California Regional Transportation Plan Guidelines, which outline model development expectations and validation tests for all travel demand models used by public agencies in California.

As stated in Section 4.6, *Transportation,* of the Draft EIR, the Westside TDF Model was originally developed, calibrated, and validated to 2008 conditions. 2008 is the most recent year in which a consistent data set of population, employment and households is available for the SCAG region (reported at the traffic analysis zone [TAZ] level of detail) for use in the model calibration process. A new TAZ data set will be available when SCAG produces its 2016 RTP update, which will reflect year 2012 conditions as a baseline. While the model calibration year reflects 2008, Year 2014 is used for the reporting of Existing Conditions in the EIR. It should be noted that, subsequent to the completion of the Draft EIR, SCAG adopted the Final 2016 RTP/SCS in April 2016 (SCAG, 2016). Based on an initial review of the 2016 RTP/SCS, SCAG's updated growth projections and transportation improvements would not be expected to change the significance of impacts or proposed mitigation measures identified in the EIR.

The comment also states that growth rates are inconsistent with publically available census data but provides no details on the data it is referring too. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-35:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project.

The first portion of this comment states that Metro's EIR for the Expo Westside Segment concluded that rush hour conditions would exist throughout the day and states the opinion that the Westside cannot accommodate the additional density assumed by the study. As acknowledged in Section 4.6.3 of the Draft EIR, the Westside, like many other urban areas throughout the country, experiences significant traffic congestion. The commenter's additional statement that it is "improper to take credit from one value which exceeds capacity to another that also exceeds capacity" is unclear. To the extent this comment is related to traffic congestion, Project impacts are based on current CEQA and City guidelines (see Impacts 4.6-2 and 4.6-4 related to level of service impacts anticipated with the Proposed Project).

The second portion of this comment states that the study is misleading because the same sociodemographic increases that apply to the Future without Project conditions also apply to the Future with Project conditions. As described in Section 4.6.4 of the Draft EIR, the impact analysis accounts for background growth that is expected to occur by Year 2035. The Proposed Project does not propose any zoning or land use changes in the Specific Plan area. Therefore, it is reasonable to apply the same growth projections to Future without Project and Future with Project conditions.

The VMT portion of this comment is similar to, and raises the same issues as those raised in, comment PC5-5; please refer to Response to Comment PC5-5.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-36:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. It appears that the comment is regarding the TIA fees related to land use types not specified in the fee tables, known as special generators. Special generators are defined in the Specific Plan ordinances. The comment also states that single family home prototypes were not included in the economic feasibility analysis. The feasibility analysis examined prototypes that reflect the most common expected development types. The Westside is a built-out urban environment that does not have many vacant single family parcels available for new single family development. As confirmed by the Department of City Planning 2014 Growth and Infrastructure Report (City of Los Angeles Department of City Planning, 2014), new single family home development on Westside is largely stagnant. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-37:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is related to the proposed TIA fees. The commenter provides no evidence that the assumed growth rates are unlikely. As described in Section 4.6.4 of the Draft EIR, future growth forecasts were based on the City's Travel Demand Forecasting Model, which captures planned growth within the project area, as updated to reflect the most recent growth forecasts in SCAG's 2012-2035 RTP/SCS, which themselves were verified by LA City Planning. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-38:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is stating that there is no substantial evidence that the transportation improvements will reduce VMT. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion on the methodology used to develop the VMT forecasts with the Proposed Project using the Westside TDF Model. The mobility projects envisioned through the CTCSP and WLA TIMP updates are intended to reduce VMT and VMT per capita and to provide better access and transportation options to residents, workers and visitors on the Westside. In addition to quantifying the VMT and VMT per capita reductions using the Westside TDF Model with the Proposed Project list updates, a literature review was also conducted to compare the types of transportation improvements being considered to research related to VMT characteristics as summarized in the Nexus Study (included in Appendix B of the Draft EIR). The expected VMT reduction from each category of projects was based on research documented in the California Air Pollution Control Officers Association's *Quantifying Greenhouse Gas Mitigation Measures* (CAPCOA, 2014).

The VMT per capita portion of this comment is similar to, and raises the same issues as those raised in, comment PC5-5; please refer to Response to Comment PC5-5. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-39:

Please see Response to Comment PC5-17 regarding the Aliso Canyon leak and its relationship to impacts associated with the Proposed Project. The comment that the conclusion of Impact 4.1-3 of the Draft EIR is inconsistent with MP 2035's congestion increases is noted. It is unclear what this comment is referring to; therefore, no further response can be provided.

Response to Comment PC5-40:

The comment states that the conclusions of the Draft EIR with respect to the exposure of sensitive receptors to substantial pollutant concentrations are flawed as a result of the Aliso Canyon leak. The Aliso Canyon leak was an event that occurred over a specific period of time; the natural gas leak has been stopped. Therefore, the Aliso Canyon leak will have no influence on the exposure of sensitive receptors to future emissions associated with the Proposed Project. Please see Response to Comment

PC5-17 regarding the Aliso Canyon leak and its relationship to GHG emissions associated with the Proposed Project. The comment also states that "the project cannot take credit for reductions achieved by other projects." It is not clear which other projects this comment is referencing nor does the commenter provide any substantial evidence to support this statement. If the commenter is referring to improvements in emission factors in future years, please see Master Response 2.

Response to Comment PC5-41:

The comment that the conclusions of the CTCSP/WLA TIMP Specific Plans Amendment Project Draft EIR pertaining to biological resources are different from the conclusions reached in the MP 2035 EIR is noted. The CTCSP/WLA TIMP Specific Plans Amendment Project and the MP 2035 are two different projects. While both share the same goal of increasing multi-modal transportation opportunities, the nature and extent of the proposed improvements associated with the two projects are different. First, MP 2035 is a citywide plan that would result in transportation-related improvements being located in different areas than the CTCSP/WLA TIMP project area. Moreover, some improvements associated with MP 2035 would require the acquisition of land outside existing street right-of-ways, whereas, with the exception of the Lincoln Boulevard Bridge Enhancement, the proposed transportation improvements associated with the CTCSP/WLA TIMP Specific Plans Amendment Project would occur within existing street right-of-ways. Finally, while both EIRs are program level documents, a greater level of planning has been conducted for the CTCSP/WLA TIMP Specific Plans Amendment Project in the form of the Westside Mobility Plan. As a result, there is more definition regarding the location and nature of the proposed transportation improvements and, as a result, the potential for the proposed improvements to result in impacts to biological resources is easier to ascertain.

As identified in Section 4.2, *Biological Resources,* of the CTCSP/WLA TIMP Specific Plans Amendment Project Draft EIR, the Lincoln Boulevard Bridge Enhancement is the only potential future transportation improvement under the Proposed Project that would occur within an area that contains sensitive habitat (i.e., the Ballona Creek Wetlands Significant Ecological Area [SEA]). Other transportation improvements would occur within existing right-of-ways. As described in Section 4.2 of the Draft EIR, as part of the required review and permitting processes for any disturbance of the Ballona Wetlands, potential project-specific impacts would be assessed and project-specific mitigation would be applied, as appropriate, to reduce potential impacts. Therefore, it was determined that, with the implementation of recommended mitigation measures, impacts to biological resources would be less than significant.

As identified in Section 4.6 of the MP 2035 EIR (City of Los Angeles Department of City Planning, 2015), implementation of MP 2035 involves various types of projects (including improvements associated with transit enhanced networks, bicycle enhanced networks, and pedestrian enhanced networks) that would be located within 200 feet of three SEAs and is likely to involve other improvements that may include the acquisition of additional right-of way in the vicinity of open space or undeveloped areas that contain native vegetation. Thus, there is a potential for substantial adverse impacts to biological resources to occur under MP 2035, as acknowledged in that EIR. Further, given the much wider scope of MP 2035, there is greater uncertainty about the extent to which the mobility improvements could occur outside of the existing right-of-ways near SEAs and other areas with native vegetation or open space. Given the greater potential for native habitat to be affected under MP 2035, and the greater uncertainty about the extent to which this may occur, the MP 2035 EIR concluded that impacts due to construction may remain significant after implementation of mitigation.

Response to Comment PC5-42:

GHG Emissions Reported in the Draft EIR

The commenter's statement that the conclusions of the Draft EIR pertaining to GHG quality emissions are flawed is noted. The commenter does not provide substantial evidence to support this assertion. Total construction plus operational GHG emissions associated with the Proposed Project are reported in Table 4.3-2 of the Draft EIR. The values in this table are not per capita numbers. As shown in the table, total GHG emissions associated with the Proposed Project would be lower for all pollutants when compared to existing conditions and when compared to the Future Without Project scenario.

Effects of Congestion on Air Quality

Please see Master Response 2 regarding the methodology used in the Draft EIR to account for air quality impacts due to increased congestion.

Scenarios Evaluated in the Draft EIR

The scenarios evaluated in the Draft EIR are outlined in the introduction to Chapter 4, *Environmental Impacts*, of the Draft EIR. As noted in that discussion, the future scenarios evaluated in the Draft EIR assumed that planned transportation improvements, such as those identified in SCAG's 2012-2035 RTP/SCS, would be in place by 2035, and that background growth would occur as forecasted by SCAG. However, the future scenarios did not include any other changes to the transportation network, including changes associated with future projects. The impacts of the Proposed Project in conjunction with other projects (i.e., cumulative impacts) are evaluated in Section 5.1 of the Draft EIR. As noted in that section, one of the projects that was considered in the cumulative analysis was MP 2035.

Response to Comment PC5-43:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Response to Comment PC5-12 regarding use of public transit ridership trends. The Proposed Project would improve transportation infrastructure in the project area; the Project would not result in the deterioration of infrastructure.

Response to Comment PC5-44:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter does not provide substantial evidence to support the claim that incentives for TOD and affordable housing would result in changes in future land use patterns. To the contrary, the Draft EIR found that the proposed TIA fee updates would not foreseeably affect land uses within the study area. The potential for the proposed TIA fee updates to alter land use patterns in the Specific Plan areas was evaluated in Section 4.4, *Land Use and Planning,* of the Draft EIR and was based on an economic impact analysis that was conducted for the Proposed Project. The economic impact analysis found that, given the overall magnitude of development costs, the proposed TIA fees would be unlikely to materially affect market dynamics or deter feasible development from taking place in the CTCSP and WLA TIMP. The analysis concluded that the feasibility of development in the project area is principally affected by factors other than TIA fees, such as tenure, location, affordable housing component, or density bonus incentives. These factors, which would not be affected by the Proposed Project, have a larger impact on the feasibility of new developments and the amount of investor return, and are critical in determining what development will occur. The economic analysis concluded that, in general, the TIA fees represent such a small portion of overall development cost that TIA fees on new development along with TIA fee credits are

not expected to change the broader fundamental economics of new development. Therefore, the Proposed Project would not foreseeably affect the type of land uses within the study area.

Response to Comment PC5-45:

The commenter states that the Proposed Project would directly conflict with the General Plan, General Plan Framework, Housing Element and Land Use Element. The commenter does not provide substantial evidence to support this assertion. Please see Response to Comment PC5-8 for a discussion as to why the Proposed Project would not be growth inducing and Response to Comment PC5-15 for a discussion of the Project's consistency with the General Plan Framework. The Proposed Project is not a land use plan and would not result in any new development or influence the density of future development. Therefore, the Project would not have any impacts with respect to consistency with the Housing Element or Land Use Element.

The comment states that the goal of reducing congestion and cut-through traffic is in direct conflict with the Transportation Element (MP 2035). As noted in Master Response 1, the project objectives do not include an objective relating to reducing congestion. Similarly, reducing cut-through traffic is not an objective of the project. Impacts related to congestion are addressed in Impact 4.6-2 of the Draft EIR and impacts related to the diversion of traffic are addressed in Impact 4.6-3.

Response to Comment PC5-46:

The comment that the conclusions of the CTCSP/WLA TIMP Specific Plans Amendment Project Draft EIR pertaining to noise impacts are different from the conclusions reached in the MP 2035 EIR is noted. The CTCSP/WLA TIMP Specific Plans Amendment Project and the MP 2035 are two different projects. While both share the same goal of increasing multi-modal transportation opportunities, the nature and extent of the proposed improvements associated with the two projects are different. Moreover, as noted in Response to Comment PC5-16, the CTCSP/WLA TIMP Specific Plans Amendment Project provides a greater level of detail than the citywide MP 2035. A discussion of specific differences between the two in terms of their noise analyses is provided below.

The Draft EIR for the Proposed Project and the MP 2035 EIR reached different conclusions regarding construction noise impacts. The MP 2035 EIR determined that construction noise impacts would be less than significant with implementation of mitigation (City of Los Angeles Department of City Planning, 2015), while the Draft EIR for the Proposed Project determined that construction noise impacts would remain significant and unavoidable with implementation of mitigation. The CTCSP/WLA TIMP Specific Plans Amendment Project Draft EIR evaluated construction-related noise impacts associated with specific projects, whereas the MP 2035 EIR reached conclusions at a citywide level of detail. Specifically, the MP 2035 EIR assumed that no pile driving or other intense construction activity would occur that would generate very high levels of noise. Therefore, while construction activities lasting more than one day could exceed existing ambient noise levels by 10 dBA or more at any one noise sensitive use during construction of the MP 2035 Enhanced Networks, it was not expected that construction activities lasting more than ten days in a three-month period would exceed existing ambient noise levels by 5 dBA or more at any one noise sensitive use. Conversely, under the Proposed Project, as discussed in Section 4.5, *Noise and Vibration*, of the Draft EIR (page 4.5-19), it was assumed that construction associated with the center-running BRT platforms along Lincoln and Sepulveda boulevards, the 1-10 Ramp Reconfiguration at Bundy Drive, and the Lincoln Bridge widening would involve a high level of construction activity over a lengthy construction period in proximity to noise-sensitive uses. Additionally, as discussed in on page 4.5-19 of the Draft EIR, the

Lincoln Bridge widening may involve use of a pile driver. Given the potential that high intensity construction activities may occur over an extended period under the Proposed Project, it was conservatively determined that construction activities lasting more than one day could exceed existing ambient noise levels by 10 dBA or more at any one noise sensitive use and that construction activities lasting more than ten days in a three-month period could exceed existing ambient noise levels by 5 dBA or more at a noise sensitive use. These construction projects would require separate environmental analysis prior to being undertaken and that analysis may reach a different conclusion based on more specificity about such subsequent projects and details regarding location, timing and duration.

Response to Comment PC5-47:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is stating that Impact 4.6-2 is inconsistent with other findings in the EIR and that the project is not achieving its objectives. Please see Master Response 1 regarding Project Objectives. Impact 4.6-2 is stating that the implementation of the Proposed Project would exceed thresholds relating to operation of the vehicular circulation system, and that this would be a significant and unavoidable impact. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-48:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is stating that Impact 4.6-3 is inconsistent with the project objectives. Please see Master Response 1 regarding Project Objectives. The mitigation measure (MM-T-2) states that LADOT shall implement the Neighborhood Protection Program on impacted residential streets based on an analysis of project-specific impacts conducted according to LADOT Traffic Study Policies and Procedures (LADOT, 2014). The implementation of the mitigation measure would reduce the level of impact but cannot be guaranteed to reduce residential traffic volumes below the City's current thresholds, and regional growth is expected to increase overall activity levels and travel demand in the study area. Therefore, the impact was identified as significant and unavoidable. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-49:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is stating that Impact 4.6-4 is inconsistent with the project objectives. Please see Master Response 1 regarding Project Objectives. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR or provide any new substantial evidence to support its assertions (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-50:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is stating that there is no evidence to support the finding of Impact 4.6-5. Please see Section 4.6, *Transportation,* of the Draft EIR for the significance criteria applied for emergency access impacts for the Proposed Project. The comment provides no substantial evidence related to Fire Stations 37, 92 and 59 supporting the need for different analysis or conclusions from those in the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-51:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is stating that Impact 4.6-7 does not consider the inability of deliveries to be made using the center lane of roadways such as Westwood and Pico Boulevards. Impact 4.6-7 is regarding physical changes to the roadway network that would adversely affect transportation safety. The center lane of roadways is not intended for delivery vehicles. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-52:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is questioning Impact 4.6-8 in relation to transit ridership and states that the finding of reduced vehicle trips and VMT is misleading and not supported by the EIR's finding of increased congestion. Impact 4.6-8 is regarding disruption to traffic during construction, which could include temporary street closures; temporary loss of regular vehicular or pedestrian access to existing land uses; temporary loss of an existing bus stop or rerouting of bus lines; or creation of traffic hazards. It is unclear how the comment regarding transit ridership is related to Impact 4.6-8. The VMT portion of this comment is similar to, and raises the same issues as those raised in, comment PC5-5; please refer to Response to Comment PC5-5. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-53:

Contrary to this comment, cumulative impacts of the Proposed Project and the Exposition Corridor Transit Neighborhood Plan (ECTNP) are addressed in Chapter 5, *Other CEQA Considerations,* of the Draft EIR. Regarding the commenter's claim that improper segmentation is occurring between the two projects, the ECTNP is a zoning ordinance, that would guide future development along the Exposition Light Rail Corridor, whereas the CTCSP/WLA TIM Specific Plans Amendment Project is a transportation impact fee update for the entire west side of Los Angeles, which includes a portion of the Exposition Corridor. Plans for land uses along the corridor are separate, and have independent utility, from the proposed amendments to the CTCSP and WLA TIMP. Neither the ECTNP nor the Proposed Project is dependent on the other being adopted. Moreover, neither project is a reasonably

foreseeable result of the other project. The CTCSP and WLA TIMP transportation fee can be imposed on projects in West LA regardless if zoning revisions are adopted in the future, including related to the ECTNP or other specific plans. Additionally, the ECTNP is not relying on the current fee or the update to the fee program in CTCSP and WLA TIMP for its proposed zoning program.

Response to Comment PC5-54:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that there is no evidence that shows that ATCS improves capacity at intersections. Please see the discussion under Impact 4.6-2 for information on how the model and analysis results account for ITS improvements, such as ATCS. The impact analysis has not assumed that additional operational benefits would be achieved through ITS or signal upgrades. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-55:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the impact analysis does not study vehicular capacity decreases on BRT arterials. Please see Section 4.6, *Transportation,* of the Draft EIR for an overview of the impact analysis methodology. As stated in Table 4.6-12, the BRT corridors consider the reduction in vehicular capacity as part of the impact analysis. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-56:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the impacts of additional transit service on Westwood Boulevard have not been studied. Please see Chapter 3, *Project Description,* of the Draft EIR for the list of transportation projects that are being considered as part of the Specific Plan updates. Additional transit service is not being proposed on Westwood Boulevard. Please see Section 4.6, *Transportation,* of the Draft EIR for an overview of the impact analysis methodology. The transportation impact analysis was based on a volume-weighted average of the V/C ratios for the analyzed roadway segments in the Specific Plan area, including Westwood Boulevard. The commenter is stating that the impacts of MP 2035 have not been considered. MP 2035 is considered as part of the cumulative impact analysis. Cumulative impacts are addressed in Chapter 5, *Other CEQA Considerations,* of the EIR. In addition, the recent changes to MP 2035 related to Westwood Boulevard (i.e., removal of Westwood Boulevard from the Bicycle Enhanced Network) do not change the analysis or conclusions presented in the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-57:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the impacts of Olympic Boulevard operations on FS59 have not been analyzed. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-58:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is stating that the Neighborhood Protection Program on the Proposed Project lists is inconsistent with the fact that this section in LADOT has been effectively eliminated. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-59:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is stating that the EIR should study the impacts and opportunities of autonomous vehicles. Autonomous vehicle research is still underway and the timing of their integration into the transportation system is not yet known. As autonomous vehicles become more commonplace, their effect on the transportation system can be considered as part of future studies. It would be speculative at this time to include the potential benefits or impacts of autonomous vehicles. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-60:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is stating that the Santa Monica Boulevard Transit Parkway was envisioned as a multi-modal highway but was not implemented as proposed. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-61:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the TIMP cannot take credit for intersection improvements already required as project mitigations. There are no specific intersection improvements included as part of the Proposed Project that are also required as mitigation. Please see the discussion in the Draft EIR under Impact 4.6-2 for information on how the model and analysis results account for intersection improvements, including signal upgrades. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-62:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the CCNTMP is under constant attack and cites an example of a traffic study for the City School that was recently approved by LADOT. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-63:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-64:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the proposed streetscape plans are likely inconsistent with reducing congestion and will likely impact emergency access due to additional barrier and reduced road capacity. The commenter provides no substantial evidence to support these statements. Regarding impacts to emergency response, please see the discussion of Impact 4.6-5 in the Draft EIR. Please see Master Response 1 regarding Project Objectives. As noted in the master response, the Draft EIR does not include an objective related to reducing congestion.

Response to Comment PC5-65:

The content of this comment is similar to, and raises the same issues as those raised in, comment PC3-3; please refer to Response to Comment PC3-3.

Response to Comment PC5-66:

Regarding the comment that the EIR does not address impacts of increased water use from increased development, the Proposed Project is not a land use planning document. No new development would occur, or be entitled, in association with the Proposed Project. To the extent that the comment references future water use for infrastructure improvements from the fee program, it should be noted that the City has a number of policies aimed at water conservation in association with the landscaping of new development. Among them, the Los Angeles Green Building Code (LAGBC) has a number of water conservation requirements that pertain to new projects. In particular, projects with a Los Angeles Department of Building and Safety permit valuation of over $200,000 are required to achieve LAGBC Tier 1 conformance, which mandates water efficient landscape irrigation design and reduction of indoor water use, among other things. Based on this, it is not reasonably foreseeable that the project would result in significant impacts to water use. No further response is required because the comment fails to provide any substantial evidence that would question the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-67:

The commenter states that the Proposed Project may increase the homeless population. The commenter does not provide any substantial evidence for this assertion. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 1091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-68:

The commenter states that the Draft EIR does not address impacts on policing. Impacts on law enforcement services were address in the Initial Study, which is included in Appendix C, *Notice of Preparation/Scoping,* of the Draft EIR. As indicated in the Initial Study, the Proposed Project would not increase the demand for public services, including police protection. The commenter does not provide any substantial evidence that the Proposed Project would result in impacts on policing.

Response to Comment PC5-69:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the EIR fails to address issues related to the Special Parking Revenue Fund that would reduce parking related trips. The Special Parking Revenue Fund has no relation to the Proposed Project. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-70:

As noted in Response to Comment PC5-16, the relationship between MP 2035 and the Proposed Project is described in Chapter 5, *Other CEQA Considerations,* of the Draft EIR. As described therein, MP 2035 provides the framework for future planning documents, such as the proposed amendments to the CTCSP and WLA TIMP, which take a closer look at the transportation system in specific areas of the City and recommend more detailed implementation strategies to realize MP 2035. Because the CTCSP/WLA TIMP Specific Plans Amendment Project represents a more detailed level of planning, there are some minor differences between the transportation systems described in each.

Response to Comment PC5-71:

The commenter confuses statements in the proposed Plan with analysis in the Draft EIR. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-72:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the EIR does not consider vehicle queueing on Pico Boulevard east of the 405. As discussed in Section 4.6, *Transportation,* of the Draft EIR, the transportation impact analysis was based on a volume-weighted average of the V/C ratios for the analyzed roadway segments in the Specific Plan area based on the information known at

the time of the preparation of the Draft EIR. Analysis was conducted at the aggregate specific plan scale, the traffic operation results reflect the impacts related to the project location and number of vehicle travel lanes. In studying the project based on the currently available information, it is not feasible or practical to develop a conceptual design and impact analysis for every segment and every intersection for the potential projects contained in the project lists. In addition, since the design treatments are expected to affect local operating conditions, reporting more detailed results would be misleading and present an incomplete and likely inaccurate picture of potential impacts. No further response is required because the comment does not provide any substantial evidence that demonstrates the need for different analysis or conclusions in the Draft EIR, including the reasonableness and appropriateness of the level and scope of analysis (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-73:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the EIR fails to account for ongoing maintenance for the improvements. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC5-74:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the demand model contains errors and specifically states that it does not identifying peak period parking restrictions on Westwood Boulevard. The Westside TDF Model, as documented in the *Model Development Report* contained in Appendix F of the Draft EIR, considers the roadway capacity during the morning and evening peak travel periods as well as during off-peak periods. The parking restrictions on Westwood Boulevard during peak travel hours are reflected in the Westside TDF Model. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC5-75:

Please see Response to Comment PC7-12 regarding the alternatives studied in the Draft EIR and a discussion as to why additional alternatives do not need to be evaluated in the EIR.

Response to Comment PC5-76:

The Century City North and Century City South Specific Plans (City of Los Angeles, 1981a; City of Los Angeles, 1981b) are intended to provide regulatory controls and incentives for the systematic execution of portions of the related Community Plan, and to provide for public needs, convenience and general welfare as the development of these areas necessitate. The plans intend to assure orderly development and provide street capacity and other public facilities adequate for the intensity and design of development by establishing general procedures for the phasing of development within the Specific Plan areas. The Century City North and South Specific Plans would not be affected by the

Proposed Project, nor has the commenter provided any substantial evidence that the Proposed Project would have an impact on these plans.

Response to Comment PC5-77:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. It should be noted that the MP 2035 project is separate from the Proposed Project and MP 2035 underwent its own environmental process. The City's response to comments provided on the MP 2035 environmental analysis were included in the Final EIR for MP 2035 (City of Los Angeles Department of City Planning, 2015). Cumulative impacts from the Proposed Project and MP 2035 are addressed in Section 5.1 of the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

From: **Paul Howard** <Paul@tharchitecture.com>
Date: Mon, Mar 7, 2016 at 6:24 PM
Subject: EIR Draft Comments: Propose a new Draft Project for the Costal Transportation Corridor Specific Plan Draft Project list (December 2015)
To: "westside2@fehrandpeers.com" <westside2@fehrandpeers.com>
Cc: "Steven.Katigbak@LAcity.org" <Steven.Katigbak@lacity.org>, Luciana Tagliaferri <Luciana@tharchitecture.com>, "paul.backstrom@lacity.org" <paul.backstrom@lacity.org>

Westside2 Draft EIR:

Hi my name is Paul Howard with TH Architecture and I am a local business owner in Del Rey on Del Rey Avenue. My partner Luciana Tagliaferri and I started our firm about a year and a half ago and we have identified a huge need to connect our community and place of work to commute and recreate safely. We are excited about the Westside Mobility plan and the proposed improvements however we feel there could be further emphasis on cycling routes and pedestrian routes in conjunction with the Corridor Transportation Improvements stated within the Executive summary and Project Objectives in Section 2.4. There needs to be a solution in conjunction with the proposed Lincoln Bridge Improvements which allow new connection across Ballona Creek between Centinela Bridge and Lincoln Bridge which is safe for pedestrians and Cyclists. Lincoln and Centinela are major transit corridors which are a safety hazard to pedestrians and cyclists.

We would like to propose an additional Project to be added to the Coastal Transportation Corridor Specific Plan Draft Project list. This additional project would be a Pedestrian/Bike bridge over Ballona Creek, located between Lincoln and Centinela Bridges.

A grant proposal identifying the need for additional pedestrian neighborhood scale north south connections across Ballona Creek was submitted for the LA2050 Grants Challenge. The proposal was #6 out of 54 proposals and we were able to make the Top 10 as far a number of votes so we are aware this proposal gained a huge amount of support from the surrounding Community. 1

http://myla2050connect2015.maker.good.is/projects/BallonaBikePedBridge?position=5&sort=discussed

This submission allowed us to gain considerable community support for the project and we would like to make sure any specific plan updates and visions will include North South Connector Routes across Ballona Creek. Lincoln is extremely dangerous to encourage cycling since the route is a major transit corridor, similar to Centinela which is equally as dangerous street with the traffic entering and exiting the 90 Fwy.

The project proposes the use of existing bridge abutments which is critical because this will limit the impact on wildlife and disturbance of Ballona Creek stream bed. A development is proposed for this current land which is privately held, but however we feel there are alternatives to using the right of way and maintenance area around the peninsula and not encroach on the private land. Since the 90 pretty much blocks any access East of the Site and further West on the site

you would have to span across the creek entirely, this is a very critical connection which could improve the overall mobility within the area.

We want to highlight how critical the point of connection we are proposing is to the current proposed Draft Projects list. Four of the Proposed Draft Projects intersect at this point or are within a few hundred yards of the proposed Pedestrian Bridge.

1) Centinela Creek Multi Use Path ends at the Bridge Site but there is no option to cross the creek.

2) Beethoven Street/ McConnell Avenue NEN Ends at the other side of the path but no option to cross the creek.

3) Culver Bike Boulevard lane could connect into the South Side of the Ballona Creek Bank and continue on to the Centinela Creek Multi Use Path 1

4) Sepulveda Channel Multi Use Path is in close proximity and would allow people to connect in from McLauglin come down the Ballona Creek Path and cross the Creek but there is currently not a means across the creek .

5) In general we would feel this connection would further enhance the Citywide Bicycle Plan per Mobility 2035 allowing quicker connection times and connection from incredible amount of businesses in Playa Vista to Venice and Mar Vista by an easy means of connection.

Additional paths that cross or connect at this location are : Culver city Bike Path along Culver Boulevard ends at McConnell and will continue to Playa Vista.

Ballona Creek Bike Path already exists at this location Connecting Culver City and Baldwin Hills to Beach Bike path and the Marina with Parks to Playa Initiative by County/MRCA.

Without the Bridge to get to Playa Vista and Del Rey Businesses adds an additional 1.5 to 1.8 miles for people coming down Beethoven or McConnell from Mar Vista, Venice and the Marina to commute to Playa Vista.

Additional Proposed Draft Projects:

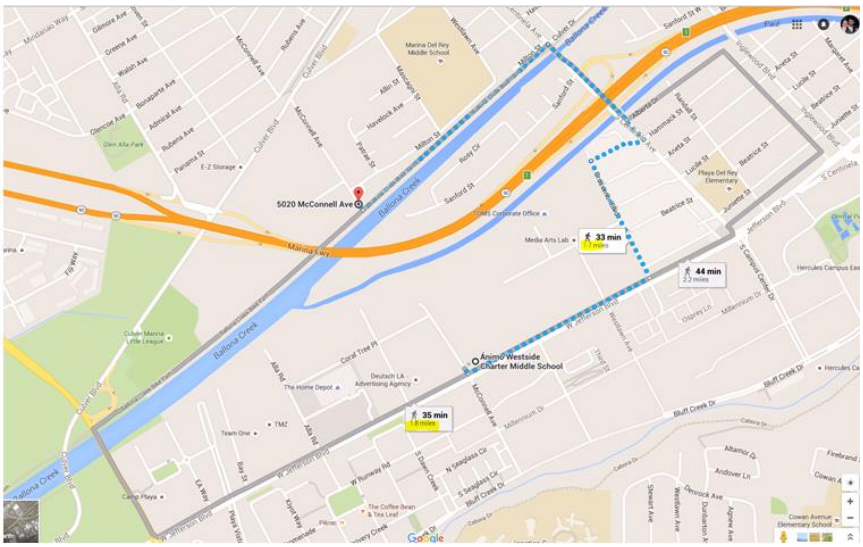
1) A bike path connecting the proposed pedestrian bridge at marina 90 FWY adjacent to the Marina 90 FWy to the Marvin Braude Bike Path in the Marina which directly connects into Venice along the old Pacific Electric Red Car train line (the tracks still exist in Lincoln Blvd). This would allow people who live in Venice to Easily and safely commute from Venice to Playa Vista. A light with Pedestrian Crosswalk already exists at the Marina 90 FWY and Lincoln Intersection however this would need to be enhanced to allow a safe crossing for cyclists and Pedestrians. 2

We would ask the Specific Plan and Draft Projects take into account the increased development and connections needed between Santa Monica, Venice, Marina, Del Rey and Playa Vista with increased number of new Technology businesses moving into the area with “Silicon Beach”. We would ask that greater emphasis is placed on how to effectively connect these places of new 3

business offices and surrounding neighborhoods where these employees will live and to safely with Pedestrian and Bicycle routes that will incentivize people to walk or use a bike rather than get into a car. We understand a massive amount of emphasis is being placed on public transportation however, a huge component to reduce and alleviate would be to provide safe routes for cycling. Currently the main barrier to people traveling by bike in our area is Safety. Encouraging more cyclists to use major transit corridors (ie Lincoln Bridge) as main route for bikes will only increase bike/automobile incidents, could be a hazard to the safety of the public, and ultimately if not perceived as a safe route, will not be used and people will resort to commuting by car. 3

Here is a Link to a 360 Sphere View of the site for the proposed bridge from Google: 4

https://www.google.com/maps/place/Ballona+Creek+Bike+Path,+Los+Angeles,+CA/@33.980435,-118.4248689,3a,75y,59.65h,90t/data=!3m8!1e1!3m6!1s-G6i0csE2wmg%2FVod31d8hkTI%2FAAAAAAAAFfd8%2FB7-X7LAGC9k!2e4!3e11!6s%2F%2Flh4.googleusercontent.com%2F-G6i0csE2wmg%2FVod31d8hkTI%2FAAAAAAAAFfd8%2FB7-X7LAGC9k%2Fw203-h101-n-k-no%2F!7i9728!8i4864!4m2!3m1!1s0x80c2ba12bc5a03f7:0x76f0ced694679831



Sincerely,

Paul Howard, AIA, LEED AP, NCARB
Paul@THarchitecture.com
310.795.7552

TAGLIAFERRI HOWARD ARCHITECTURE

4136 Del Rey Ave. Marina Del Rey, CA 90292
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Steven Katigbak
Planning Assistant
LA Department of City Planning
Policy Planning Division
(213) 978-1349 | steven.katigbak@lacity.org

PC6 Paul Howard Tagliaferri Howard Architecture 3/7/2016

Response to Comment PC6-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that a bicycle and pedestrian bridge across Ballona Creek near McConnell Avenue be considered in the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC6-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that a bike path connecting the proposed bicycle and pedestrian bridge across Ballona Creek to the Marvin Braude Bike Path be implemented. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC6-3:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that additional active transportation improvements be considered to connect the development occurring in the Westside communities, and in particular in the area of "Silicon Beach." The project lists reflect active transportation improvements throughout the Specific Plan areas. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC6-4:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter provided a link to an on-line map of the bicycle and pedestrian bridge across Ballona Creek. The content of this comment is similar to, and raises the same issues as those raised in, comment PC6-1; please refer to Response to Comment PC6-1. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Letter PC7

West Of Westwood
Homeowners Association

March 6, 2016

Ms. Conni Pallini-Tipton, Senior Planner
City of Los Angeles Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA 90012

c/o: westside2@fehrandpeers.com

Re: CTC/WLA TIMP Specific Plans Update Project
Specific Plan, TIA and DEIR Comments

Dear Ms. Pallini-Tipton:

I am writing to you on behalf of the Board of Directors of the West of Westwood Homeowners Association (HOA), representing approximately 1,200 households in the Rancho Park area. The West of Westwood HOA generally supports enhanced mobility and streetscape improvements within the West Los Angeles area however, we have several concerns relating to protecting the quality of life of our residents and preserving the existing neighborhoods in the West Los Angeles area in relationship to the proposed Specific Plan Updates and proposed TIA. 1

The following comments provide a detailed discussion of issues and areas of concern that affect the West of Westwood HOA:

West Los Angeles TIMP Specific Plan Project List and TIA:

1. The West of Westwood HOA appreciates the effort to update the TIA fees, which we agree is are needed, however, we do have concerns that this effort regarding improved mobility is too limited related to roadway improvements and does not include numerous roadway improvement opportunities as a result of its emphasis on pedestrian, bike and bus improvements. Furthermore, the objective of implementing roadway improvements should not be limited only to existing right-of-way and should include right-of-way expansion where needed (discussed in detail in Item Nos. 2 and 4 below). Additional right-of-way acquisition can occur with individual development projects in future years that can improve vehicular movement and reduce vehicular delay in addition to the proposed projects. 2
2. First, dedicated right-turn pockets at intersections on major and secondary highway corridors (Boulevard and Avenue classifications) that do not currently exist or are not proposed within the two Specific Plan areas should be included (whether with or without signal phasing to be determined by traffic analysis) in the project list and fee analysis. Some specific examples within and adjacent to 3

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the WOWHOA community include one or more directions at intersections along the Pico corridor at Sawtelle, Sepulveda, Military, Veteran, Westwood, and Overland and at National and Westwood, National and Sepulveda, and National and Sawtelle although there are many additional intersections within the plan areas that should also be included. These projects should be funded by developers if expanded development project occur on their property adjacent to these intersections with allowances for fee credit if allowed to physically complete these improvements. 3

3. Second, left turn signal phasing should be implemented in all directions at the Pico Boulevard and Sawtelle Boulevard intersection. 4
4. Third, additional access and connectivity to the I-405 onramp just north of the intersection should be studied and incorporated into the TIA for the potential future development of the undeveloped portion of Tennessee Avenue from Sepulveda through to Cotner. 5
5. Fourth, signalization at Military Avenue and Pico Boulevard should also be analyzed and incorporated into the TIA fee structure. 6
6. Fees should be determined by accurate fully vetted engineering cost estimates rather than ballpark assumptions. It is unclear and inconsistent between staff comments at public meetings and draft documents as to the methodology used to calculate construction costs of project list improvements. Please clarify. 7
7. It is unclear if mixed-use projects that are not defined as a "TOD project" has to pay fees for each land use component or not. Please clarify and WOWHOA believes that this is the appropriate fee methodology. 8
8. "TOD" and "convenient retail use" terminology has not been defined in the TIA. This creates a loophole in interpretation of applicability of fees. These terms should be defined. How do you define a "convenient" retail use versus an "inconvenient use legally? If TOD is based upon AB 3005 requirements then it should be spelled out in the Specific Plan and TIA definitions and fee chart. For transparency to the public WOWHOA requests that the precise definition be provided in the Specific Plan. 9
9. We think that the Transit Credit granted for a ½ mile radius is not necessarily realistic in that people generally do not walk more than 1/8th to a ¼ mile distance to use transit. We are concerned that housing projects will not pay their fair share of the costs for the proposed improvements and the additional improvements that we have identified above ending up with added housing density and congestion with the actual improvements not actually getting implemented. What commitments will the City make to ensure that these project improvements occur within the project timeline of 2035 (or sooner) when these improvements are already needed without added development? Our neighborhood is about to experience increased traffic impacts particularly on our already overly impacted north-south roadway corridors with the opening of the at-grade Exposition transit line in May 2016. 10
10. It is unfair to exclude private educational facilities and affordable dwelling units as exempt from impact fees when they are commercial ventures that still create 11

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traffic impacts. They should pay their fair share cost Affordable housing units should not be exempt either because they do create some traffic, however, their fee should be substantially lower presumably than other housing since their trip generation is lower. 11

Draft EIR:

11. WOWHOA does not support Alternative 3B the reduced vehicle capacity alternative to eliminate capacity by removing parking and a vehicle travel lane in order to install a Bus Rapid Transit (BRT) and bike lane. We do not support the removal of parking or travel lanes on Westwood Boulevard for a dedicated bike lane. Other options should be explored per our EIR comment letter provided to the City of Los Angeles for the West Los Angeles Bike Plan. 12
12. Although WOWHOA generally supports such transit measures such as the proposed circulator shuttle service and Rapid Bus enhancements on Olympic, Pico and Venice analyzed in the Draft EIR, we do have concerns regarding the proposed Sepulveda Bus Rapid Transit (BRT) depending upon the design of the system (potential loss of vehicular travel lane or lanes for a heavily impacted highway which is the only north-south route that is unimpeded by the Expo light rail in our neighborhood that is essential to vehicular access and emergency services access) and the implementation of the Sepulveda BRT (operational characteristics-full time restrictions versus limitation to peak periods) that could further exacerbate traffic conditions and limit access to our community by emergency services personnel. 13

Finally, our comments outlined above do not reflect concerns and possible objections regarding future individual development projects and objections to the past recent trend by the City to support and approve development projects with excessive density that exceeds all general plan, WLA Community and Specific Plans, and zoning requirements. These concerns affect the health, welfare, safety, and overall quality of life of the households we represent. We continue to have concerns regarding the overdevelopment of our neighborhood and the greater West Los Angeles area. The Board of Directors of the West of Westwood Homeowners Association respectfully requests that the issues raised in this letter be addressed in revised TIA and CTC/WLA TIMP Specific Plan documents and the Final EIR. 14

Sincerely,

Terri Tippit

Terri Tippit, President
West of Westwood Homeowners Association

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PC7	Terri Tippit	West of Westwood Homeowners Association	3/6/2016

Response to Comment PC7-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see responses to specific comments below.

Response to Comment PC7-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that additional roadway improvements, including those requiring additional right-of-way be considered on the Proposed Project lists. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC7-3:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that right-turn pockets at intersections be implemented at specific locations. While intersection improvements are reflected in the Proposed Project lists, the improvements are conceptual at this time, and no detailed designs or implementation plans have been developed for the individual components. As described in the introduction to Chapter 4, *Environmental Impacts*, of the Draft EIR, the improvements and programs on the specific plan project lists are not entitled or constructed as part of this project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC7-4:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that left-turn signal phasing be implemented along Pico and Sawtelle Boulevards. While intersection signal upgrades are reflected in the Proposed Project lists, the improvements are conceptual at this time, and no detailed designs or implementation plans have been developed for the individual components. As described in the introduction to Chapter 4, *Environmental Impacts*, of the Draft EIR, the improvements and programs on the specific plan project lists are not entitled or constructed as part of this project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC7-5:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that additional access to the I-405 on-ramp be studied as part of the TIA for the potential future development of the undeveloped portion of Tennessee Avenue between Sepulveda and Cotner. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the

environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC7-6:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that a signal at Military Avenue and Pico Boulevard be analyzed and reflected in the TIA fees. While intersection signal upgrades are reflected in the Proposed Project lists, the improvements are conceptual at this time, and no detailed designs or implementation plans have been developed for the individual components. As described in the introduction to Chapter 4, *Environmental Impacts*, of the Draft EIR, the improvements and programs on the specific plan project lists would not be entitled or constructed as part of this project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC7-7:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting additional information on the project costs development for the TIA fees. The project costs are contained in the Nexus Study. The Nexus Study is included in Appendix B of the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC7-8:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is asking for additional information on the fee credits for TOD sites. TOD credits are defined in the Specific Plan ordinances. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC7-9:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is asking for additional information on the definitions of TOD and retail uses related to the proposed TIA fees. Definitions are contained in the Specific Plan ordinances. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC7-10:

The content of this comment is similar to, and raises the same issues as those raised in, comment PC7-8; please refer to Response to Comment PC7-8.

Response to Comment PC7-11:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that private educational facilities and affordable dwelling units should be paying TIA fees. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC7-12:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. In the evaluation in Chapter 6, *Alternatives,* of the Draft EIR, the City determined that Alternative 3B, the "Reduced Vehicle Capacity" alternative, would increase the severity of the significant and unavoidable impacts relating to transportation performance standards and neighborhood traffic intrusion. The commenter does not provide specific suggestions regarding other alternatives that should be studied in the EIR. Section 15126.6 of the State CEQA Guidelines requires an environmental impact report to describe a range of reasonable alternatives to the project, or to the location of the project, "which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives." The alternatives studied in the CTCSP-WLA TIMP Specific Plans Amendment Draft EIR represent a reasonable range of alternatives that would attain most of the basic objectives of the project, sufficient to allow informed decision-making and public participation (State CEQA Guidelines Section 15126.6(a)). An EIR need not consider multiple variations on the range of alternatives evaluated in detail. (Village Laguna of Laguna Beach Inc. v. Board of Supervisors (1982) 134 Cal.App.3d 1022, 1028). Nor must an EIR consider every conceivable alternative to the project. (In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143, 1163). Moreover, an EIR need not analyze alternatives that do not offer significant advantages over the alternatives presented in the EIR, or that constitute a different version of an alternative presented in the EIR. (Sequoia Hills Homeowners Ass'n v. City of Oakland (1993) 23 Cal.App.4th 7045).

Response to Comment PC7-13:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the West of Westwood Homeowners Association (WOWHOA) generally supports transit but has concerns regarding the proposed Sepulveda BRT project, including loss of vehicular travel lanes and emergency service access. Please see Section 4.6, *Transportation,* of the Draft EIR for an overview of the impact analysis methodology. As stated in Table 4.6-12, the BRT corridors consider the reduction in vehicular capacity as part of the impact analysis. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC7-14:

Please see Response to Comment PC5-15 regarding future development within the Specific Plan areas and a discussion of the potential density of such future development. Please also see Response to Comment 5-8 regarding the growth inducing impacts of the Proposed Project. The transportation improvements identified in the Proposed Project would facilitate movement within a mature urban area as it evolves. As discussed in these responses, the CTCSP/WLA TIMP Amendment Project would not result in any new development and would not influence the density of future development. The Proposed Project would not change the amount of growth nor where it is anticipated to occur. The Proposed Project seeks to improve transportation infrastructure on the Westside of the City given projected growth through the year 2035. Future development will occur with or without the Proposed Project. As noted in Response to Comment PC5-15, the CTCSP and WLA TIMP would amend existing impact fee programs such that when new development does occur, it must pay a TIA Fee in accordance with the amended Specific Plans. The Proposed Project would accommodate anticipated infill growth as envisioned in the General Plan Framework by providing funding needed to implement transportation infrastructure improvements. Neither the updated TIA Fee program nor the updated list of multimodal transportation improvements would change, or encourage changes in, land use density. Regarding the other issues raised in this letter, please see Responses to Comments PC7-1 through PC7-13.

Letter PC8

WESTSIDE NEIGHBORHOOD COUNCIL
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March 7, 2016

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RE: Draft WLA TIMP, ENV-2014-1458-EIR

Dear Ms. Pallini-Tipton,

Thank you for the opportunity to comment on the Draft WLA TIMP, ENV-2014-1458-EIR, ("WLA TIMP" or "Project"). The Westside Neighborhood Council (WNC) represents 80,000 stakeholders, including businesses and residents in the Cheviot Hills, Rancho Park and Century City area. Our comments are confined to those streets impacting our immediate vicinity, specifically but not only Westwood Blvd, and related streets – Pico Boulevard, Sepulveda Boulevard, Overland Avenue. While we have tried to be thorough, our comments should not be considered exclusive or dispositive. 1

West Los Angeles is undergoing a major transformation with the expansion of light rail trains, plans for increased bus services, increased density, in addition to a focus on bike and pedestrian friendly streets. The City should be applauded for its efforts to make Los Angeles a bike friendly town, but WNC and its Stakeholders believe there is an over reliance on bike programs at the expense of congestion relief and sound, permanent parking solutions. 2

In addition, the Project serves most effectively as a template for increased development and density in the City's densest, most congested neighborhoods. The project provides too many incentives near fixed transit. WNC, which is bounded by two major freeways and split by an at grade rail line also has Rapid Buses on Pico Blvd. There is no distinction in the Project which differentiates that all WNC neighborhoods are within ¼ to ½ mile of a transit line. 3

Further, the Project provides no standards or benchmarks by which to evaluate what mobility methods should be undertaken and when goals are being met. It further has no way to determine what elements of the Project might realistically succeed in which communities. 4

WNC has vastly different transportation issues than, say, Brentwood or other less transit dense WLA TIMP neighborhoods. We already have incredible density and congestion, and yet to rationalize a poorly planned and under-funded Expo train line, WNC is unfairly asked to further "lean in" and accept yet more density to justify ridership projections. These specious 5

attempts at urban infill amount to "pocket zoning" and are despite near unanimous stakeholder opposition. Some other neighborhoods will be much less impacted by the increased density or not impacted at all. 5

Westside Transportation Demand Model

Given that transit use has been declining year over year for decades and street congestion continually worsens, it would seem that additional attention should go into analyzing how and where transportation in Los Angeles is built. Given the billions in transit investment, wouldn't the payoff to taxpayers and citizens be bigger if transportation were built where existing transit dependent populations live instead of building in corridors where new projects depend on additional development and new density for transit patronage? If the transportation demand model has failed to reduce congestion or increase the percentage of travel by transit thus far, perhaps the WLA TIMP and the Los Angeles public would be better served by a different model. The existing model may provide short term construction jobs, but the long term impact is worsening congestion and diminished health and over-stressed infrastructure. 6

Different Standards for Transportation

WNC believes that the Project should include evaluation of Levels of Service ("LOS") in addition to Vehicle Miles Travelled (VMT). The Federal Transportation Administration evaluates transportation project eligibility for New Starts Funding using the justification measures listed below. WNC believes that better transportation projects are built with the addition of funding from the Federal government. The Project should develop a list of similar standards to require of local transportation projects, whether or not they receive federal funding from New Starts.

- **Mobility Improvements**
  - measured by travel time benefits per project passenger mile, low-income households served, and employment near stations.
- **Environmental Benefits**
  - measured by change in regional pollutant emissions, change in regional energy consumption, and EPA air quality designation
- **Cost Effectiveness**
  - measured as the cost per hour of travel time saved.
- **Operating Efficiencies**
  - measured by system operating cost per passenger mile. [49 USC §5309(d)]

7

Streetscape Plans

WNC funded and coordinated the study of the Pico Boulevard Beautification Project and spent several years conducting public outreach and pursuing funding. A Metro Call for Projects Grant was approved and awarded in 2014. As a result, the WLA TIMP can neither take credit for the idea nor the process. Council district by district in Los Angeles, neighborhoods work to improve and beautify our streetscapes. There is no value added to the WLA TIMP to consider such endeavors as "projects" when they are already a priority for 8

residents citywide. 8

The use of bollards to separate bike tracks is inconsistent with streetscape aesthetics, especially in residential neighborhoods. Implementation of more architecturally and aesthetically minded infrastructure than plastic bollards should be indicated for all of our City streetscapes. 9

Westside Parking Study

The Westside Parking Study is woefully inadequate as it fails to acknowledge that West Los Angeles has historically suffered from insufficient parking options. 30% of the congestion on our streets is cars looking for parking which increases VMT. Cities such as Santa Monica, Beverly Hills, and Culver City all have municipal lots which encourages robust business and arts districts. Those cities made concerted efforts to provide a simple amenity to sustain business growth. In West Los Angeles all drivers are reliant on scant parking tied to small business lots or increasingly scarce street parking. This parking dearth has produced overflow parking in surrounding residential neighborhoods making them business unfriendly. It has also resulted in dozens of Preferential Parking Districts ("PPDs"). The failure to build municipal lots undermines the goal of reducing VMT and reducing greenhouse gases. 10

Roadway and ITS

The list of WLA roadway projects amounts to no more than signal light timing, turn lanes and traffic monitoring. These things are being done continually by LADOT as normal best practices. However, years of City budget cuts and outsourcing has reduced the effectiveness of many City agencies and diminished their ability to operate professionally. WNC would like to see more material commitment to actual roadway surface improvements, and accident removal to increase vehicle mobility and reduce delay. 11 In addition, we would like to see a firm commitment on the part of the City to grade-separate all rail crossings in highly congested areas like West Los Angeles. The cost of accidents and delay from rail-blocked intersections in Los Angeles is a continuing disgrace, and the catastrophic cost to human health and safety is unforgiveable. 12

Bikeways

While increasing bike riding is a fine idea with obvious health benefits to riders, the aspirational bike plan goals as represented by the WLA TIMP are out of step with the way commuters and delivery of goods travel in Los Angeles. Making changes to City streets which favor bicycles will create severe environmental impact by reducing road capacity for vehicles and increase vehicle delay for all road users except bikes. 13

For instance, while the Project acknowledges the likely impact of cut-through traffic, it relies on information from *City of Los Angeles Mobility Plan 2035* (MP 2035). That plan failed to perform an urban decay analysis to identify and mitigate cut-through neighborhood traffic; congestion due to searching for parking; air quality impacts, including additional Ultra-fine 14

Particle Emissions from increased vehicle delay; environmental and economic delay to the citywide and regional bus network; impacts to City first responder times; and the impacts of removing on-street parking for local residents, schools and businesses. 14

Further, congestion not only frustrates and angers drivers and diminishes our quality of life, but also harms the environment; increases the costs of goods and services; and make roads more dangerous. CO2 emissions are near directly proportional to miles per gallon (mpg) and CO2 is the easiest greenhouse gas emission to quantify. It is simply a fact that automobiles stuck in congestion produce higher levels of CO2 and the Project will increase congestion in WNC neighborhoods.

> "The lost time impacts both quality of life for individuals and the overall economy. Drivers give up productive work hours, and precious personal and family time. When trucks are stuck in traffic, the goods they are moving become more costly to businesses and consumers. The lost productivity from delayed passenger trips and freight deliveries harms our regional and national economic competitiveness. Along with delays, congestion increases fuel consumption and greenhouse gas emissions. 15
>
> Cars idling in traffic consume far more fuel than necessary. And vehicles emit more green-house gases in congested conditions." (http://www.highways.org/wp-content/uploads/2015/11/unclogging-study2015-hi-res.pdf)

Our Los Angeles geography and most types of gainful employment discourage commuting on foot or by bicycle. Bicycle ridership hovers near 1% of all travel trips because of the poor travel time but also because of Los Angeles' hilly topography. In addition, there are a limited number of jobs where showers are available for one who arrives at work in a full sweat. 16

Even the biking capital of the county, Portland, has seen percentage of riders stagnate over the last 5 years, and the greatest number of all new commuter trips is by automobile.

The travel times simply don't make sense for most people. Even if the number of cyclists doubled, there would still be less than 2 % of all transit trips accomplished by bike. A disproportionate investment in bicycle infrastructure at the expense of more efficient modalities is irresponsible. It undermines mobility and increases both economic costs of delay and the inherent health impacts of roadway congestion. Additional road congestion from the Project imposed on the WNC area, which has some of the most congested streets in Los Angeles is significant but should not be considered unavoidable. The Project needs to be revised to address street congestion first and development second. 17

Bicycles and walking are certainly a part of a long term City wide mobility plan but the WLA TIMP addresses transportation within WNC boundaries in a generic way which fails to provide relief for current traffic stress and excuses itself for Project related environmental injury going forward. Since the alternatives in the Project are evaluated in aggregate, individualized alternatives for each proposed change in WNC area are not realistically considered. 18

The WNC supports the Project's removal of Westwood Boulevard from the plan in favor of parallel streets. (Appendix A, PDF pg 24). We have concerns with any bike infrastructure on Sepulveda Boulevard within WNC boundaries which would further reduce roadway capacity 19

or remove important street parking now used by Sepulveda adjacent businesses. As the designated alternative to the I-405 Freeway when there are problems that slow or shut the freeway down, it is necessary to maintain both parking and roadway capacity on Sepulveda Boulevard. 19

TIA FEES

The Project acknowledges that there will be land use impacts from changes in TIA fees. WNC will experience increased density, including affordable housing, and density bonuses for transit proximate development. WNC does not agree with this policy. 20

Insufficient Mitigatation

The mitigation for cut-through traffic in our already dense and congested WNC neighborhoods is insufficient because the WLA TIMP intends to squeeze vehicular traffic into fewer lanes on arterials when they know that the unavoidable outcome will be cut-through traffic. 21

It is ironic that the Project seeks to increase congestion while it conveniently relies on the anticipated improvements in vehicular tail pipe emissions to attain the Project's air quality goals. Projected reductions may be true, but is not a part of the Project and the Project has no control of that outcome so that assumption cannot be used as mitigation for the air quality impacts of the Project. 22

Conclusion

The project alternatives covered in the WLA TIMP Draft EIR are much too broad and lack a realistic discussion of the feasible alternatives in each localized area pertaining to each proposed change. The WNC does not support tying all development in WLA to proximity to dedicated transit lines. Between the Expo Line and Pico, Sepulveda, Olympic, Santa Monica, Wilshire and Sunset, there is no part of our community that is not within 1/2 mile of a dedicated transit line, thus **every** project could be build more densely. The WNC does not support the reduction of parking supply in WLA, nor do we support reduction of traffic lanes. We therefore do not support Alternative 3A or 3B. 23

Finally, The WNC believes that development, wherever it is located in WLA should only be built when there is supportive infrastructure such as fire stations, police, parks, libraries, schools, and utilities. The WLA TIMP should not separate their incentives for development from the need for underlying City infrastructure. Giving bonuses or encouraging development of any kind simply for building proximate to "Dedicated Transit Lines" without that link is irresponsible and degrades quality of life, safety and the environment. 24

Respectfully submitted,

s/ /Terri Tippit//

Westside Neighborhood Council Chair

PC8 Terri Tippit Westside Neighborhood Council 3/7/2016

Response to Comment PC8-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Please see responses to specific comments below.

Response to Comment PC8-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC8-3:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment claims that the Proposed Project serves as a template for increased development and density and asserts the opinion that the project provides too many incentives near fixed transit. Please see Response to Comment PC5-8 regarding growth inducing impacts. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC8-4:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment states that the Proposed Project provides no standards to evaluate mobility methods or when goals are being met. Please see Master Response 1 regarding Project Objectives. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC8-5:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Responses to Comments PC4-11 and PC5-15 regarding development and density within the Specific Plan areas. As noted in those responses, the Proposed Project is not a land use plan and the project does not propose any zoning or land use changes. As a result, the Proposed Project would not affect the density of development within the Specific Plan areas.

Response to Comment PC8-6:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The transportation projects proposed as part of the updates to the project list are consistent with the vision of the Mobility Plan 2035. The Westside TDF model is a tool used to analyze the Proposed Projects, and does not dictate which projects should be considered for implementation. Please see Section 4.6, *Transportation,* of the Draft EIR for a summary of the development of the Westside TDF Model as well as the *Model Development Report* contained in Appendix F of the Draft EIR. The report shows that the model meets the validation thresholds established by the California Transportation Commission, and that the refinements made to the model comply with the California Regional Transportation Plan Guidelines, which outline model development expectations and validation tests for all travel demand models used by public agencies in California. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of impacts related to the circulation system. Impacts 4.6-2 and 4.6-4 describe the level of service impacts anticipated with the Proposed Project.

The content of this comment related to transit ridership trends is similar to, and raises the same issues as those raised in, comment PC5-12; please refer to Response to Comment PC5-12. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC8-7:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of impacts related to the circulation system. Impacts 4.6-2 and 4.6-4 describe the level of service impacts anticipated with the Proposed Project. The commenter is incorrect that automobile level of service is not considered as a performance measure in the Draft EIR. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC8-8:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the Pico Boulevard Beautification Project that has been incorporated into the proposed streetscape plans was already a priority for the community. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC8-9:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the use of bollards to separate bike lanes is inconsistent with the aesthetics of the streetscape plans. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the

Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC8-10:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the Westside Mobility Plan Parking Study, which is not part of the CEQA process as stated in Chapter 3, *Project Description,* of the Draft EIR. The comment states that congestion and VMT are partially related to drivers looking for parking spaces but does not identify any specific issues with the EIR analysis or conclusions and provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC8-11:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the intersection improvements, signal upgrades and traffic monitoring improvements contained on the Proposed Project lists. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC8-12:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that the City commit to the grade separation of all rail crossings. This project does not propose any new at-grade rail crossings. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC8-13:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of impacts associated with transportation, including incorporation of bicycle improvements. Section 4.6 addresses the environmental impacts associated with the reduction in road capacity due to the provision of facilities for alternative travel modes, including bicycles.

Response to Comment PC8-14:

The commenter's statements regarding the Mobility Plan EIR are noted. These comments do not pertain to the EIR for the Proposed Project. The Draft EIR analyzes the diversion of trips associated with the Proposed Project into local neighborhoods based on project-specific traffic modeling (see Impact 4.6-3). The commenter does not provide any specific comments on the environmental conclusions in the Draft EIR pertaining to the issues raised in this comment, namely land use (i.e., urban decay); air quality, including ultra-fine particulate emissions; "environmental and economic delay to the citywide and regional bus network"; impacts to first responder times; or impacts of removing on-street parking. Moreover, the commenter provides no substantial evidence

that the redistribution of traffic associated with the Proposed Project would result in any impacts to these resources.

Please see Response to Comment PC5-20 regarding the potential for the loss of street parking to result in the loss of local businesses, resulting in urban decay. Please see Section 4.1, *Air Quality,* of the Draft EIR for a discussion of impacts associated with air quality and public health risk. Specifically, Section 4.1 addresses air quality impacts associated with project-related changes in traffic. Following standard methodologies established by SCAQMD, the air quality analysis evaluated mass daily pollutant emissions in the project area, including impacts associated with PM10 and PM2.5 emissions; no standards currently exist for the evaluation of impacts associated with ultra-fine particulate matter. As air pollutants are not confined to specific neighborhoods or specific roadways, the potential redistribution of traffic associated with the Proposed Project would not have an air quality impact at the neighborhood level. Section 4.1 also addressed potential impacts to health associated with toxic air contaminants. The Draft EIR found that the Proposed Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts from operations would be less than significant. Please also see Master Response 2 for a discussion of air quality impacts associated with increased vehicle delay. Emergency response times were addressed in Section 4.6, *Transportation,* of the Draft EIR. Please also see Response to Comment PC5-9 regarding emergency response times.

Response to Comment PC8-15:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Section 4.3, *Greenhouse Gas Emissions,* of the Draft EIR for a discussion of impacts related to GHG. Specifically, Section 4.3 addresses GHG impacts associated with project-related changes in traffic. Please also see Master Response 2 for a discussion of air quality impacts, which include GHG emissions, associated with increased vehicle delay.

Response to Comment PC8-16:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the number of bicycle commuters in Los Angeles is low for various reasons, including topography, travel times, and job places not having showers. The conversion of travel lanes into bicycle lanes in targeted areas would result in increased bicycle trips as a percentage of total trips, resulting in reduced vehicle trips. The replacement of travel lanes with bicycle lanes would create a safer environment where the potential conflict between bicyclists, pedestrians, and vehicles would be reduced through the elimination of shared lanes and pedestrians being located further from vehicles. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC8-17:

The commenter's opinion that the provision of infrastructure for alternative travel modes is irresponsible is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Impacts to the vehicular circulation system are addressed in Section 4.6, *Transportation,* of the Draft EIR. In particular, see the discussion of Impact 4.6-2. As noted in that discussion, impacts of the Proposed Project on vehicular circulation were found to be significant unavoidable. Regarding the commenter's statements concerning the health impacts of

roadway congestion, Section 4.1, *Air Quality,* of the Draft EIR addressed potential impacts to health associated with toxic air contaminants. The Draft EIR found that the Proposed Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts from operations would be less than significant. Please see Master Response 2 for a discussion of air quality impacts associated with increased vehicle delay. Please also see Master Response 1 for a discussion of the objectives of the Proposed Project. As noted in Master Response 1, there is not a project objective related to reducing congestion.

Response to Comment PC8-18:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Moreover, the commenter does not provide any specific suggestions regarding alternatives that should have been studied in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC8-19:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the Westside Neighborhood Council (WNC) supports the removal of Westwood Boulevard from the plan in favor of parallel streets and is concerned with new bike infrastructure on Sepulveda Boulevard. This project does not propose any new bicycle facilities on Sepulveda Boulevard. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC8-20:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that there will be land use impacts from changes to the TIA fees, and does not agree with the fee credits being offered. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC8-21:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the mitigation measure related to cut-through traffic is not sufficient. The mitigation measure (MM-T-2) states that LADOT shall implement the Neighborhood Protection Program on impacted residential streets based on an analysis of project-specific impacts conducted according to LADOT Traffic Study Policies and Procedures. The implementation of the mitigation measure would reduce the level of impact but cannot be guaranteed to reduce residential traffic volumes below the City's current thresholds, and regional growth is expected to increase overall activity levels and travel demand in the study area. Therefore, the impact was identified as significant and unavoidable. No further response is required because the comment does not identify any feasible mitigation available, or raise any new significant

environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC8-22:

Please see Master Response 2 regarding the assumptions incorporated into the air quality analysis pertaining to future vehicle emission factors. It should be noted that future vehicle emission factors are not identified as a mitigation measure for the Proposed Project.

Response to Comment PC8-23:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Response to Comment PC7-12 regarding the alternatives studied in the Draft EIR and a discussion as to why additional alternatives do not need to be evaluated in the EIR. Please also see Response to Comment PC8-18. The commenter does not provide any specific suggestions regarding alternatives that should have been studied in the Draft EIR, therefore, no further response regarding the analysis of alternatives is required. With respect to the commenter's statements concerning the density of future development, please see Response to Comment PC5-15.

Response to Comment PC8-24:

The content of this comment is similar to, and raises the same issues as those raised in, comments PC5-15, PC5-44, and PC5-8; please refer to Response to Comment PC5-15, PC5-44 and the TOD Credit portion of PC5-8.

Subject: FW: Westside Mobility Plan DEIR comments

Westwood South of Santa Monica Blvd

Homeowner's Association

Incorporated November 8, 1971

P. O. Box 64213

Los Angeles, CA 90064-0213

March 7, 2016

Fehr & Peers

Via email: westside2@fehrandpeers.com

RE: DEIR Comment - Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan (CTCSP/WLA TIMP), Specific Plans Amendment Project: LA City EIR No. ENV-2014-1458-EIR

CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)

We wish to submit the following comments, questions and suggestions to the proposed WEST LOS ANGELES Transportation Improvement and Mitigation Draft Specific Plan on behalf of Westwood South of Santa Monica Blvd. Homeowners Association (WSSM). We represent over 3800 single family and condominium owners in the area bounded by Santa Monica and Pico Boulevards on the north and south, and by Beverly Glen and Sepulveda Boulevards on the east and west. 1

Draft Specific Plan document / West Los Angeles TIMP:

Page 4 / No. 7: What about specific mention of the establishment of a transit stop at the Sepulveda EXPO station for the Westwood-LAX shuttle bus that originates in Westwood Village? That could fall/fit under "area wide transit enhancement." As there is a strong need for LAX access pending completion of the Crenshaw line LAX connection, having the Westwood LAX bus stop at EXPO will mean that the entire EXPO line (and its feeder transit lines) will have a transit connection to LAX. (A decent waiting area (which should be part of a mobility hub at the EXPO station location) should be part of the planning for the EXPO station area.) 2

Page 4 / Add No. 15: There should be a process established for the systematic gathering of data to measure and evaluate actual traffic and transportation impacts of development to enable better future planning and to create a feedback loop to review EIR data. With post-occupancy 3

trip generation actual figures, comparisons to EIR projections could be made and additional post-occupancy mitigation fees could be levied to address impacts that had not been taken into account. This would also create an environment where there would be consequences for poorly done EIR documents that intentionally minimize project impacts. Having a full body of locally generated data on trip generation will help facilitate better planning decisions in the future. 3

It is also important to gather data that can be used to verify whether ITE averaged rates are representative of the actual Los Angeles experience. How will LA planner know whether something warrants a "special generator" rate without some data verification process? 4

What about the promotion of jobs near transit? With the exemptions granted for affordable housing along with other incentives and bonuses for affordable housing, are excessive incentives for affordable housing going to wipe out industrial uses that communities rely upon? While this project does not promote the rezoning of lands near transit, our experience to date has shown that developing TOD's for housing is a very attractive prospect for developers. Can TIMP funds be used to provide incentives to employers who offer telecommuting opportunities for their employees and/or who stagger work hours away from peak hour travel periods? These strategies both reduce congestion and related GHG emissions. 5

Page 5-8/Definitions: Add definition of TMO 6

What happens if a use of a property is changed? If, for example, a building is built with the intention of providing a child care facility but after construction and initial building occupancy, it is decided that there is no desire to continue operation. If removed, is there an assessment for that space? 7

In general, this project relies upon the City's Neighborhood Traffic Management Program (NTMP) to mitigate project impacts on local streets. It was this community's experience that when the City had financial issues, one of the first programs to be axed at DOT was the NTMProgram. Communities like ours who had been able to access developer funds to implement specific street safety improvements found ourselves unable to implement without the NTMP staff. Very little to nothing could be done. The staff were gone and the larger program and smaller-related measures (such as the speed hump program) were axed as well. (Page 10/C2 also addresses NTM program). 8

What does this project do to ensure that the NTMP staff will be in existence and available to address impacts of the project over time?

Dedicated Transit Line evaluation: It is important that ridership be measured/evaluated along with the measurement of the removal of traffic lanes if any are taken. What was the lane's capacity, traffic count, etc. before any project implementation? Is the transit on a specific street moving more people than the vehicles that would be in that dedicated lane? 9

Park and Ride: How can the City measure demand for parking at transit? Is it good practice to provide parking for transit? As many WLA locations do not have density that warrants public transit service, can parking be provided to encourage use of lines such as EXPO? 10

Project goals include the enhancement of the streetscape and related pedestrian/bike experience. When new mixed use buildings are constructed, they often seek bonus designation that allow them to reduce setbacks. This results in buildings where true landscaping is difficult to do. The policy to allow reductions in setbacks makes the environment less hospitable for all. Trees are no longer planted in the ground. Instead whatever greenery is provided is placed in planters (which are difficult to monitor over time. 11

What impact will waiving the TIMP fees for certain types of development have on land development practices in WLA? Does the waiver of fees for affordable housing coupled with already existing bonus density packages serve to create a situation that will encourage unsustainable/unsupportable growth in given areas or that will cause prices to inflate and undermine the provision of affordable housing. 12

RE: Project serving improvements: Are alleys included as locations where project serving improvements can be made? LA City appears to be relying on alleyways for the traffic that comes and goes from many new projects. In an effort to reduce mid-block driveways, this growing reliance upon small, unimproved and often pothole filled alleys creates impacts that have not been acknowledged. Who is responsible for paving the alleys? Can TIMP funds be used to re-pave alleys? Can stop signs be installed/used where alleys cross streets to improve safety? 13

Traffic Study Policies and Procedures: While there is mention made of the LADOT document that provides standards for traffic impact studies, so long as private traffic consultants work directly for a developer promoting a specific project, the objectivity of those traffic studies will be in question. While many traffic engineering firms do fine work, we have read enough EIR documents that came to conclusions that defied all logic that we are convinced that policy statements alone do not result in objective traffic studies. 14

Page 9 / Section 5 C-1 -Exemptions: The City is currently considered measures that could make illegally converted units into legal units. If unpermitted illegal units are granted recognition as standard living units, will they be required to comply with this ordinance and its fees or not? We would suggest that they should comply since they have operated and collected rents for an illegal unit for some time. 15

There are numerous sober living type businesses operating in what are R1 zoned houses. We would suggest that when the use of a home changes from a home to a business such as a sober living/community care facility that that property owner should be required to fall under the ordinance and NOT be exempted. While the single family zoned sober living home has not formally been converted, its use is greatly modified as are the impacts on the neighborhood with employees and many residents. 16

Page 10/C1-TDM Program: TDM programs should be required for large residential projects as well as commercial projects. For those projects designed as transit oriented projects (and/or transit adjacent projects) (whether residential or commercial), free or reduced cost transit passes should be required to be provided to new tenants/residents/employees of said projects for an initial period (2-4 months) so that transit travel patterns can be established. 17

Page 10/C2-NTM Program: “Before” traffic counts should be required on all adjacent streets if lane reductions are implemented so that impacts can be quantified and used to determine mitigations and evaluate their effectiveness. 18

Page 10 / D-Relationship to CEQA: While not specifically related to CEQA and compliance with this Specific Plan, we have great concerns about bike facility projects being exempt from CEQA analysis. We have found CEQA analysis and the look at alternative projects to be a very useful and important tool in helping to develop good projects (when EIR’s are properly done). When Westwood Blvd. was initially recommended to be a bike facility with one lane of traffic to be removed from both north and southbound lanes, we were told that there would be no significant impacts on traffic. There was no formal analysis behind this statement and it was our homeowners association that went out to engage a traffic engineer to prove or disprove the assurances we had been given (that did not make sense to us). A subsequent analysis showed that there would be significant delays at the major intersections and their crossings that would likely result in significant cut-through traffic on smaller residential streets where our residents 19

walk and ride their bikes. Such information should have come out in the project's EIR documents. However, now that such documents are not required by the State, the City should develop policies to ensure that all impacts for ALL transportation initiatives are adequately and objectively evaluated. It does no good to implement a bike lane on Westwood if the displaced traffic will create unsafe walking and riding conditions on nearby streets and if the congestion will result in the generation of additional pollutants and greenhouse gases. Where are efforts to include the impacts of congestion on the environment for this Specific Plan? 19

Page 13/E3-Administrative Costs: Is there a cap on possible administrative costs? 20

Page 13/F1e-Exemptions from TIA fee: We would not like to see any policies adopted that could result in an incentive for churches or temples and other religious institutions to be established on residentially zoned land (and especially on R1 zoned lots). 21

Page 13/F1f: We would recommend that exemptions to the fee be granted only to NON PROFIT educational institutions (public and/or private), and not to profit making educational institutions. (The same criteria might be applied to religious institutions.) 22

Page 14/G.-Refunds: The LA City Council often grants forgiveness of fees/taxes to businesses such as hotels. We do not want to see these fees forgiven by Council "if no longer needed" on a case by case basis. If the ordinance is in force, its provisions should not be forgiven unless legally required. 23

Page 15/B1a/Opportunities for In-Lieu Credit: No In-Lieu credit should be given for conditions/mitigations negotiated in private/confidential settings. Privately negotiated settlements to project appeals or litigation are not to be considered for credits. 24

Page 15/B1b-Land Dedications: The calculations of any fair market value assessment resulting in an In-Lieu Credit shall be publicly available for review. 25

Page 16/ci: We would not want to see this authority to be used as a mechanism that would result in the removal of job producing industrial/light manufacturing land from its use and instead be used for housing. While affordable housing units are desired, they are not to replace industrially zoned land which we seek to preserve. We would therefore suggest that no in lieu credits be granted for a housing project that seeks to be built on manufacturing / light industrial property in West LA. 26

Does the City wish to incentivize the construction of housing (affordable or otherwise) within 500 feet of major freeway arterials? 27

Page 17/di(c)/TOD Requirements: Where parking is needed for a nearby transit station, a project should NOT be penalized for reaching TOD requirements for providing additional parking spaces for transit riders. The ratio should be reconsidered when parking is supplied for transit users. 28

Page 17d(b)/The criteria may result in creating an incentive for placing supermarkets at every TOD project! We have seen a number of TOD's come in with proposed large supermarkets in areas that are already saturated with markets. It is important that credits do not create artificial incentives for uses that are not needed or cannot be sustained. 29

Page 18/2a-b-In Lieu Estimates: Does anyone get to see final/actual costs as opposed to estimates? 30

While there is a statement that in-lieu credit are not to be granted that are in excess of the assessed TIA Fees, is it a good idea to state that such credits cannot be transferred to other projects/locations, etc.? 31

Page 20/A-First level of appeals: We would like to see a level of transparency in the appeals process. The appeal and decision letter should be made public. If an applicant has two levels of opportunity for appeal, the community should have the opportunity to be heard as well. At the very least, the record should be open and nearby NC and stakeholders notified of pending appeals. 32

Comments on List of Transportation Projects/Appendix A:

Transit:

Sepulveda BRT: Does the fact that Sepulveda is the designated alternate route for the 405 freeway have any impact on the proposed BRT? If there was an incident on the 405 freeway that required diverting freeway traffic onto Sepulveda, could the BRT lane operation be suspended in order to deal with a time-limited problem situation? 33

Olympic Rapid Bus Enhancement: How would the bus from Century City embark upon its return route? There is no kiss and ride location for vehicles coming to EXPO from the north to the south. Where would that bus go after making its drop? How will that route tie in with plans to establish some kind of Century City to EXPO shuttle? Is it appropriate to rely upon the Westwood station as the station where Century City riders will access EXPO? What about the Palms station? 34

ADD: Westwood LAX bus service to stop at EXPO Sepulveda station (at least for some of its runs). 35

Possible add: AMTRAK Bakersfield to Torrance bus to stop at EXPO Sepulveda station (rather than at a Westwood Village Gayley Ave. corner). 36

Circulator/shuttle Service: Add community shuttle service that will connect EXPO with WSSM's more northern portions and key community destinations. We need a DASH-like service. It would be very interesting to know whether a connection with UCLA Medical Center and the campus area would be well subscribed. 37

ADDITIONAL:

While it would be reassuring to know that METRO will return to our community to address any unexpected shortcomings or problems associated with the operation of the EXPO Line, we cannot be assured that that will be the case. If there are problems that arise after the train is in operation, there may be no METRO funding or City funds available to address those problems which are unknown at this time. Can language be inserted into the TIMP document that would open the door to providing funds to solve problems associated with EXPO (to do needed traffic studies, to pay for grant proposal drafting, to do implementation). 38

Bicycle and Pedestrian:

Mobility Hubs: We still believe that more transit rider supportive facilities are needed at the Sepulveda station and we would urge the City and METRO to pursue this with cement plant new owners. Negotiations should also take place to see whether additional transit rider parking is needed at the Sepulveda station area. 39

Sepulveda Blvd.: While improvements are needed between Olympic and National, improvements are also needed on Sepulveda between Olympic and Santa Monica. The streetscape is poor and vehicle-related businesses along the east side of the street often use the sidewalk area for vehicles. The west side of the street offers an even more horrible pedestrian
experience. 40

Westwood Blvd.: We do not support a bike facility on busy Westwood Blvd. We do not believe it will be a safe place to ride. 41

Veteran Avenue NEN: This route was removed from the City's Mobility Plan so far as we know. We support its removal as it is a poor option for safe bicycle travel. 42

Motor Avenue: We wonder if cutouts can be made on the bumpouts along Motor between Monte Mar and Manning so that bikes are not forced into the traffic lanes at the corners where there are these bumpouts. 43

EXPO Light Railway Greenway Improvement Project: We are very pleased to see the project included amongst suggested TIMP projects. 44

Roadway & ITS:

Signal upgrades: There is no mention on the project list as to the ability to determine appropriateness of and implement installation of traffic signals that permit the passage of only pedestrians and/or bicycles. At some intersections signals are needed to allow for bikes and pedestrians to cross but at the same time, these signals are not intended to open new routes for cut-through traffic. We would suggest an item on the project list for such ped-activated signals along with listing of any related roadway improvements such as bollards, pork chops and/or attractive center barricades that block vehicles from crossing from one side of an intersection to the other. 45

Trip Reduction Programs:

TDM Rideshare toolkit interface for large residential projects (stand alone or to integrate with nearby commercial users (such as in Century City with the TMO). 46

Overall comments:

With the uncertainties related to the manner in which new VMT rules will be implemented, we are recommending/requesting that in an introductory period, the City would require LOS measures as well as VMT data in all traffic evaluations. The City has a considerable record of LOS data and while current transit focus is on VMT, we believe it is also important to keep a watchful eye on the generation of congestion. We do not subscribe to the current train of thought that seeks to intentionally slow traffic under the belief that in doing so it will be safer for bicycles and pedestrians. We know that when cars must wait for multiple signal phases in order to cross an intersection that they do not sit patiently in their vehicles waiting. Many leave. They make illegal U-turns. They drive through residential neighborhoods with little regard for stop signs or other impediments. 47

There has been no discussion in the proposed plans about the impacts on air pollution of idling vehicles stuck in congestion. 48

We remain somewhat skeptical about the ability of transit to provide a realistic travel option for many Angelenos. While comparisons between Los Angeles and New York, Chicago, Paris and London are frequently made, there are very clear differences between cities that grew up AROUND existing transit services and those (like LA) that are laying transit on top of an existing urban environment. Further, none of the major metropolitan areas that are often mentioned as models for LA are the size of Los Angeles (total number of square miles) nor or separated by a mountain range. These differences make LA a very different entity and one that may never have the type of transit coverage that other major metro areas have. 49

Rather than acknowledge this important difference, it appears that instead City planners seek to focus development on the immediate areas within ½ mile where transit service exists… whether it be fixed rail or bus lines. In the case of our community, this would mean that nearly all land would be eligible for incentives for development. The impact of providing additional incentives for development where developers already flock could have a devastating impact on our neighborhood character and on the quality of life of existing residents and businesses. In short, this could usher in a wave of demolition and construction not unlike what happened to neighborhoods under the urban renewal programs of the 1960's many of which are now looked upon primarily as failed efforts. 50

Our community values its commercial corridors and the merchants that have established businesses there. It is well known that many of the buildings on Pico and Westwood Blvd. rely on street parking for their customers. We do not support the removal of parking that serves these businesses because we know that this loss will lead to the acceleration of the demolition of the buildings that house these businesses. The businesses will be lost to the community and may never return following construction of new mixed use buildings. The creation of streets where development bonuses and incentives were granted will create man made canyons in the midst of our communities not only dividing one side of the community from another, but creating structures that diminish the quality of life and value of adjacent residential properties. This, despite the fact that the study's environmental documents state that:

"Implementation of the proposed updates to the TIA fee programs would not alter future land use patterns, materially affect the feasibility of development in the CTCSP and WLA TIMP areas, adversely affect development of affordable housing, or result in any direct or indirect physical impacts that would physically divide an established community. The transportation improvements would not result in any changes in General Plan land designations or zoning classifications or divide or isolate existing neighborhoods or communities. The improvements would be compatible with surrounding uses and would improve safety, access, and alternative modes of transportation in the surrounding area. Some of the transportation improvement projects would result in the removal of some on-street parking; however, the proposed loss of on-street parking is not anticipated to permanently prevent or disrupt access to surrounding land uses." (Chapter 2/Executive Summary pages 2-18 to 2-19) 51

The conclusion is that the project's impact is "less than significant." We would disagree. The project's impact, particularly when coupled with incentives for development within a half mile of transit as offered by the City, will have a very significant impact on the character of our community and the survival of its business community.

There has been no discussion in City Planning circles where the EXPO Corridor Transportation Neighborhood Plan is being promoted or in this plan that attempts to assess the ability of the City's infrastructure to serve/service the new populations imagined from the upzoning to take place and from the bonuses and incentives that draw development here. We do not have the infrastructure to support the growth that will come from encouraging development based upon 52

proximity to "dedicated transit lines" is irresponsible. It degrades the quality of life in the community and ignores issues of public safety and overall environmental quality. 52

We are skeptical about removing traffic lanes for bicycle facilities and/or transit where the result will be to increase congestion on the few major north/south corridors that we have in West LA/Westwood area. IF the City of Los Angeles were to be successful in reaching a level of bicyclists as in Portland, Oregon (a city recognized as being very bike friendly and for having a high percentage of riders at 5 percent), it would still be difficult to justify the levels of congestion created for the remaining commuters who must rely upon an automobile for their primary work access. (While it may be true that most of LA can be reached via transit, we must acknowledge that the length of a trip needs to be considered when determining whether transit use is a realistic alternative. We also need to acknowledge that many families contain more than one wage earner and that it may be impossible for families to find a place to live where the two or more wage earners can access transit for their daily commutes. It seems punitive to be designing a transit system and city that seeks to make those commutes longer under the guise that congestion will create streets that are safer for pedestrians and bicycle riders. Again, the impacts of cut-through traffic are being ignored or minimized by stating that a Neighborhood Traffic Management program will address this incursion. Our experience is that NTM programs can be helpful for a short while until other routes are discovered. NTM programs are basically a shell game – shifting traffic from one street or neighborhood to another. And, with the City's fiscal health always a concern, we fear that resources dedicated to this effort will wax and wane with the financial seasons. Can TIMP money be used to provide staffing for the program should the City cease to fund it? 53 54 55

The provision of safe separated bike lanes should be a citywide priority. This will be an expensive and challenging task because of the congestion issues that should not be ignored by planners. The City should not justify the intentional creation of congestion to accommodate a small percentage of the population who ride bikes at the expense of a much larger population who must use a vehicle and/or are unable to walk or ride to their destination. Again, what will the impacts of congestion be on environmental measures and the goals to reduce greenhouse gas emissions? What is the cost of delay to commuters and to those who must deliver freight to our community? Already on some streets in our area delivery trucks park in the center lane of a commercial street during the day in order to make their deliveries. If left hand turn lanes and/or center lanes are removed, what will be the impact on the ability of these trucks to make their deliveries? 56 57 58

Where is the analysis of added congestion and the failure to design mitigations for congestion/declining LOS to the ability of first responders (LAPD, LAFD) to reach their destination? How will the possible removal of traffic lanes affect their ability to reach their calls? The LAFD has been faulted for failing to reach target destinations within a specified number of minutes. However, the inability to reach target locations is in many respects something that is out of their hands. If traffic and land use planners intentionally seek to increase congestion under the notion that this will make streets safer for pedestrians and bike riders, then what can the LAFD do to reach those in need within a window required to save a life? Does this mean that additional fire stations and/or police staffing is needed and should be required as a result of the new transportation and planning policies? Is it realistic to assume that any reduction in VMT is the result of a true reduction in driving or, is it possible that those who must drive will move to another area with less congestion and continue to drive? TIMP projects should include those that construct roadway improvements that could improve travel time. 59 60

Increasing capacity reduces congestion and the resulting greenhouse gas emissions. If a goal of the study was to increase capacity in select locations, there could be gains in travel speed which would increase fuel efficiency and result in a decrease in GHG. It is possible that the new 61

VMT measure does not capture the true impacts of roadway uses and instead should take into account vehicle minutes running (per Bill Pope) and LOS impact. 61

Should there be incentives granted to companies that encourage telecommuting by their employees and who also offer off-peak work schedules? These strategies reduce VMT and congestion. 62

Residential collector streets are treated as "arterials" by city planning and the residential collector streets are excluded as candidates for cut-through traffic protection measures. They must be included in these programs. Further, LA DOT should not allow developers to use residential collector streets in traffic studies as traffic absorbers. This is in conflict with the design guides for complete streets that say that collector streets are non-arterial street and are to provide access to and from arterial streets for local traffic. They are not intended for cut-through traffic. 63

So long as major pieces of the public transit puzzle remain unfunded, unbuilt and/or under construction, it is difficult to adopt the philosophy that a large percentage of our population should rely upon transit and that our transportation goals should rely on the reduction of VMT as the primary measure of success. The most fundamental of transit connections still remain unbuilt with the subway years away from its endpoint at the VA and no concrete plan (no pun intended) for the transit to be built over (or through) the Sepulveda Pass or connecting to LAX and the South Bay. These are major pieces of a transit system that we lack. So, instead of acknowledging those gaps and the ability of transit to serve large percentages of the population, the City is seeking to overdevelop corridors where people might locate because they are in close proximity to transit. While the environmental documents for the Westside Mobility Study state that there will be less than significant impacts from this project on land use, the Study cannot be evaluated without looking at companion initiatives at the Planning Dept. Together they are designed to and will alter the very fabric of our community. TIMP fees are needed and should be assessed on all projects (and perhaps at higher rates to match those in nearby Santa Monica where our proposed fees are less). However, we see an over-emphasis on housing in an area where land values tend to reduce the numbers of affordable units and promote higher priced and luxury housing instead. We see a lack of focus on job creating strategies which would reduce the need of Westside residents to travel far distances for work. We are already a community rich with educational and cultural opportunities. We do not want to see the adoption of new policies that reduce the land available for jobs creation. 64 65 66

Could TIMP funds be used for feasibility studies to assess the merit of, for example, new technologies that offer different models of transportation (perhaps now unknown)? Has an assessment been made of the solar hybrid monorail (Frazer Nash Metrail) mentioned in Bill Pope's comments? 67 68

We are appreciative of the outreach efforts of the Westside Mobility Study staff and look forward to discussions around the comments that are received in response to the DEIR and proposed ordinances. 69

Sincerely,

Barbara Broide

President

cc: Hon Paul Koretz, CD5

PC9 Barbara Broide Westwood South of Santa Monica Blvd. Homeowners Association 3/7/2016

Response to Comment PC9-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Please see responses to specific comments below.

Response to Comment PC9-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is asking for additional bus service as part of the Proposed Project. Local bus/circulator service is included in the Proposed Projects lists. As described in the introduction to Chapter 4, *Environmental Impacts*, of the Draft EIR, the improvements are conceptual at this time, and no detailed designs or implementation plans have been developed for the individual components. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-3:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment requests that there should be a process established for the gathering of data to measure and evaluate transportation impacts of development. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-4:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the trip rates used to develop the TIA fees as well as the trip rates for special generators. Special generators are defined in the Specific Plan ordinances. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-5:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the proposed TIA fees and associated trip credits. The TIA fees and credits are defined in the Specific Plan ordinances. The content of this comment is similar to, and raises the same issues as those raised in, comment PC9-26 and PC9-64; please refer to Response to Comment PC9-26 and the portion of Response to Comment PC9-64 regarding development near transit. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental

analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-6:

The comment is noted and is hereby part of the Final EIR. The comment requests that an additional definition be added. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-7:

The comment is noted and is hereby part of the Final EIR. The commenter asks a question regarding TIA fee assessment for land use projects where a change of use occurs. Change of Use and Existing Use Credit are described in the Specific Plan Ordinances. As described in the Specific Plan Ordinances, changes of use are subject to TIA fee assessment. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-8:

The comment is noted and is hereby part of the Final EIR. This is a comment on the implementation of LADOT's NTM (neighborhood traffic management) program. As discussed in Section 4.6, *Transportation,* of the Draft EIR, MM-T-2 states that LADOT shall implement the Neighborhood Protection Program on impacted residential streets based on an analysis of project-specific impacts conducted according to LADOT Traffic Study Policies and Procedures. The Draft EIR concludes that the implementation of the mitigation measure would reduce the level of impact but cannot be guaranteed to reduce residential traffic volumes below the City's current thresholds. Therefore the impact analysis conclusion does not rely on the implementation of NTM as fully mitigating the impact. Furthermore, regional growth is expected to increase overall activity levels and travel demand in the study area. Therefore, the impact was identified as significant and unavoidable. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-9:

The comment is noted and is hereby part of the Final EIR. The comment requests that transit ridership and other transportation conditions be measured prior to implementation of dedicated transit lines and that transit ridership be compared to the number of people that could be served by vehicles that would otherwise be utilizing the travel lane and does not identify any specific issues with the EIR analysis or conclusions and provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. As discussed in Section 4.6, *Transportation,* of the Draft EIR, traffic impacts were analyzed with the implementation of transit projects in the project list updates. Table 4.6-12 of the Draft EIR summarizes the transit projects analyzed as part of the project list updates and notes the projects that would be served by a dedicated transit lane. No further response is required because the comment does not raise any new significant environmental issues or

address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-10:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment asks a question about parking for transit and does not identify any specific issues with the EIR analysis or conclusions and provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. The traffic impact analysis did not assume any new park and ride facilities within the study area or rely on the presence of parking close to transit stations. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-11:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding development setbacks. Regulations regarding development setbacks are not a part of the Proposed Project. Please see Chapter 3, *Project Description*, of the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-12:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment asks a question regarding encouraging growth and undermining affordable housing. Please see Section 5.3 of the Draft EIR for a discussion of growth-inducing impacts. Please see response PC5-8 regarding growth inducing impacts. As concluded in Section 4.4, *Land Use and Planning,* of the Draft EIR, the proposed TIA fee updates would not materially affect the feasibility of development in the CTCSP and WLA TIMP areas, nor would it adversely affect development of affordable housing.

Response to Comment PC9-13:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment asks a question regarding alley improvements. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-14:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding traffic studies conducted for EIRs on development. This comment is not a comment on the EIR of the Proposed Project. No further response is required because the comment asks a question and does not raise any new significant

environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-15:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment asks a question regarding fee assessment for illegal dwelling units that have been legalized. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-16:

The content of this comment is similar to, and raises the same issues as those raised in, comment PC9-7; please refer to Response to Comment PC9-7.

Response to Comment PC9-17:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. This is a comment on the administration and requirements of LADOT's Transportation Demand Management (TDM) program. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-18:

The content of this comment is similar to, and raises the same issues as those raised in, comments PC9-8; please refer to Response to Comment PC9-8.

Response to Comment PC9-19:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding CEQA analysis for transportation projects, including bicycle lanes. The commenter clarifies that the comment is regarding CEQA analysis in general, not the CEQA analysis of the Proposed Project. The comment also asks if the impacts of congestion have been studied for the Proposed Project. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of impacts related to the circulation system, including congestion related impacts. Impacts 4.6-2 and 4.6-4 describe the level of service impacts anticipated with the Proposed Project. The commenter is incorrect that automobile level of service is not considered as a performance measure in the Draft EIR. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC9-20:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is asking for additional information regarding administrative costs. The administrative costs are described in trust fund ordinances that accompany the Specific Plans. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-21:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding incentives for churches and temples on residentially zoned land. The Proposed Project does not propose any zoning or land use changes and therefore would not accommodate any uses other than those uses that are otherwise permitted by current zoning regulations. Please see Chapter 3, *Project Description*, of the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-22:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is asserting an opinion regarding fee exemptions. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a

Response to Comment PC9-23:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding how decision makers implement city policies. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-24:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding how in-lieu credits are awarded. In-Lieu credit provisions are described in the Specific Plans. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-25:

The content of this comment is similar to, and raises the same issues as those raised in, comment PC9-24; please refer to Response to Comment PC9-24.

Response to Comment PC9-26:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter expressed the need to preserve commercial/industrial zoned lands. The Proposed Project is not a land use plan and does not propose any zoning or land use changes, including rezoning of commercial or industrial lands. Furthermore, the City recognizes the importance of retaining jobs-producing lands, such as commercial and industrial, and has stated policies in the Community Plans.

The comment is also regarding now in-lieu credits are awarded. The content of this comment is similar to, and raises the same issues as those raised in, comment PC9-24; please refer to Response to Comment PC9-24.

Response to Comment PC9-27:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment asks a general question regarding housing near freeways. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-28:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding parking near transit stations. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-29:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the criteria for receiving TOD Fee Credit. TOD Fee Credit is described in the Specific Plans. The TOD Fee Credit is an optional opportunity and is guided by State law AB3005; new development near transit is not required to abide by the TOD criteria. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-30:

The content of this comment is similar to, and raises the same issues as those raised in, comment PC9-24; please refer to Response to Comment PC9-24.

Response to Comment PC9-31:

The content of this comment is similar to, and raises the same issues as those raised in, comment PC9-24; please refer to Response to Comment PC9-24.

Response to Comment PC9-32:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. This comment is regarding appeal procedures. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-33:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that Sepulveda Boulevard is an alternate route to the I-405, and asking if BRT could be suspended to allow additional vehicles to utilize Sepulveda during an incident on I-405. As described in the introduction to Chapter 4, *Environmental Impacts*, of the Draft EIR, the improvements and programs on the specific plan project lists would not be entitled or constructed as part of this project. The improvements are conceptual at this time, and no detailed designs or implementation plans have been developed for the individual components. No further response is required because the comment asks a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-34:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is asking for additional information regarding the transit circulator service proposed as part of the project lists. As described in the introduction to Chapter 4, *Environmental Impacts*, of the Draft EIR, the improvements are conceptual at this time, and no detailed designs or implementation plans have been developed for the individual components. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-35:

The content of this comment is similar to, and raises the same issues as those raised in, comment PC9-2; please refer to Response to Comment PC9-2.

Response to Comment PC9-36:

The content of this comment is similar to, and raises the same issues as those raised in, comment PC9-2; please refer to Response to Comment PC9-2.

Response to Comment PC9-37:

The content of this comment is similar to, and raises the same issues as those raised in, comment PC9-2; please refer to Response to Comment PC9-2.

Response to Comment PC9-38:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that impact fees be used to address "problems associated with the operation of the Expo Line." Per State law, impact fees are intended to mitigate the impacts of new development. As discussed in the Nexus Study (included in Appendix B of the Draft EIR), impact fee programs cannot be used to correct existing deficiencies. While the impact fees cannot fund mitigations for the Expo Line's operation, the impact fees propose to fund a number of improvements that enhance access to Expo Line stations. Please see the list of transportation improvements in the Specific Plans.

Response to Comment PC9-39:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that more support facilities are needed at the Sepulveda transit station, including a Mobility Hub and additional parking. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-40:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting additional streetscape improvements on Sepulveda Boulevard. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-41:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that it does not support a bicycle facility on Westwood Boulevard. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-42:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-43:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is asking about the existing bumpouts on

Motor Avenue. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-44:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is pleased to see the Expo Light Rail Greenway Improvement Project on the Proposed Project list. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-45:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting additional traffic signals that would only serve pedestrian and bicyclists. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-46:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is referencing TDM projects that are part of the Proposed Project lists. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-47:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that the City continue to require LOS in addition to VMT in future traffic studies. The Proposed Project does not include the proposal or adoption of new CEQA guidelines for the City. The EIR analysis for the Proposed Project follows the City's currently adopted CEQA impact analysis guidelines and also provides information regarding VMT for informational purposes. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-48:

Please see Master Response 2 regarding how the Draft EIR analysis incorporated congestion effects into the Proposed Project emission inventories.

Response to Comment PC9-49:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that transit may not be a realistic travel option for many Angelenos. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-50:

The content of this comment is similar to, and raises the same issues as those raised in, comments PC5-44 and PC7-8; please refer to Response to Comment PC5-44 and PC7-8.

Response to Comment PC9-51:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Response to Comment PC5-20 regarding potential impacts to businesses resulting from the removal of street parking. While individual businesses could be impacted, the inconvenience in loss of on-street parking is not anticipated to lead to the permanent displacement of business leading to blight or physical degradation of any area. The City has implemented peak-period parking restrictions in areas throughout the City to increase peak-hour travel capacity or improved travel time performance for transit, and retail uses along these areas continue to thrive in spite of limited parking restrictions. Examples of this include the La Cienega Commercial Corridor, and Wilshire Boulevard in the Koreatown neighborhood where Metro recently implemented the first phase of Wilshire BRT. Regarding the commenter's assertion that the Proposed Project would create "man made canyons [sic]" that would physically divide the community and diminish quality of life and property values, the Proposed Project is not a land use planning document. No new development would occur, or be entitled, in association with the Proposed Project.

Response to Comment PC9-52:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is referring to proposed zoning regulations in the proposed Expo Corridor Transit Neighborhood Plan (ECTNP). The Proposed Project does not propose any zoning or land use changes. Please see Section 5.1 of the Draft EIR, which evaluates the cumulative impacts of the Proposed Project in conjunction with other reasonably foreseeable future projects. As described on page 5-3 of the Draft EIR, the cumulative impacts analysis evaluates the impacts of the Proposed Project in conjunction with the land use changes associated with the ECTNP.

Response to Comment PC9-53:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the removal of vehicular travel lanes for other modes may not be desirable due to congestion. Please see Master Response 1 regarding Project Objectives. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-54:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that it is unrealistic for all workers to reside in close proximity to transit for their daily commutes and that it is "punitive to be designing a transit system and city that seeks to make those commutes longer under the guise that congestion will create streets that are safer for pedestrians and bicycle riders." Please see Master Response 1 regarding Project Objectives. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-55:

The content of this comment is similar to, and raises the same issues as those raised in, comment PC8-21; please refer to Response to Comment PC8-21.

Response to Comment PC9-56:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that safe separated bike lanes should be a citywide priority but the resulting congestion issues need to be considered. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-57:

Please see Section 4.3, *Greenhouse Gas Emissions,* of the Draft EIR for a discussion of impacts associated with greenhouse gas emissions. As stated in the Draft EIR, the Proposed Project would not have any significant, unavoidable impacts related to greenhouse gas emissions. Specifically, the Proposed Project would not have any significant impacts with respect to applicable plans, policies, or regulations adopted for the purpose of reducing greenhouse gas emissions.

Response to Comment PC9-58:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is asking about the cost of delay is commuters and delivery trucks. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of impacts related to the circulation system. Impacts 4.6-2 and 4.6-4 describe the level of service impacts anticipated with the Proposed Project. The portion of the comment regarding delivery trucks utilizing the center lanes of streets is similar to, and raises the same issues as those raised in, comment PC5-51; please refer to Response to Comment PC5-51. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-59:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding emergency response times. As discussed in Impact 4.6-5 of the Draft EIR, "while the project would impact segment-level LOS, there is not a direct relationship between predicted travel delay and response times" (page 4.6-62 to 4.6-63). A discussion of the threshold used to evaluate emergency access impacts can be found on pages 4.6-46 and 4.6-47 of the Draft EIR. The comment does not identify any specific issues with the EIR analysis or conclusions and provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC9-60:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is asking if VMT reductions are due to people moving to areas with less congestion and continuing to drive, and is requesting that more roadway improvement projects be part of the Specific Plan updates. As discussed in the introduction to Chapter 4, *Environmental Impacts*, of the Draft EIR, the EIR analyzes future conditions, including background growth, with project implementation (referred to as "Future with Project" conditions), and compares these conditions to existing conditions in 2014. As explained in Section 4.6, *Transportation,* of the Draft EIR, VMT per capita was reported to isolate the effects of the project from land use changes that would occur between existing and Future with Project conditions. In addition, total VMT under Future with Project conditions was compared to a Future without Project scenario. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-61:

Please see Master Response 1 for a discussion of the objectives of the Proposed Project. As noted in Master Response 1, the addition of new right-of-way to the City's street network has been determined to be inconsistent with the MP 2035 goals and policies regarding the use of existing right-of-way and the reduction of VMT. The project objectives do not include increasing the capacity of the City's roadway network. Moreover, as noted in Master Response 1, there is not a project objective related to reducing congestion. Impacts of the Proposed Project with respect to GHG emissions were evaluated in Section 4.3, *Greenhouse Gas Emissions,* of the Draft EIR. As stated in the Draft EIR, the Proposed Project would not have any significant unavoidable impacts relating to GHG emissions. Please see Master Response 2 regarding how the Draft EIR analysis incorporated congestion effects into the Proposed Project emission inventories, including GHG inventories. It should be noted that, as shown in Section 4.3 of the Draft EIR, GHG emissions with implementation of the Proposed Project would be lower than both Existing Conditions and Future without Project conditions.

Response to Comment PC9-62:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding transportation demand management incentives. As described in the Specific Plans and list of transportation improvements, the Proposed Project supports transportation demand management programs and strategies. No

further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-63:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that residential collector streets are treated as arterials by the City and should be eligible for traffic calming measures and does not specifically comment on the adequacy of the EIR. The comment states that LADOT should not allow developers to use residential streets in their traffic studies as traffic absorbers; however, the Proposed Project has no relation to how traffic impact studies are prepared for new development projects. In addition, the feasibility of implementing traffic calming measures on collector streets is a design consideration to be made by LADOT and does not have any relation to the Proposed Project. As the comment pertains to the analysis completed in the Draft EIR, as discussed in Section 4.6, *Transportation,* of the Draft EIR, MM-T-2 states that LADOT shall implement the Neighborhood Protection Program on impacted residential streets based on an analysis of project-specific impacts conducted according to LADOT Traffic Study Policies and Procedures. The implementation of the mitigation measure would reduce the level of impact but cannot be guaranteed to reduce residential traffic volumes below the City's current thresholds, and regional growth is expected to increase overall activity levels and travel demand in the study area. Therefore, the impact was identified as significant and unavoidable. If the definition of the Neighborhood Protection Program was expanded to include collector streets, the findings under Impact 4.6-2 and MM-T-2 would not change. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-64:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that major portions of the planned transit network still needs to be constructed and that the City is overdeveloping corridors that are in close proximity to transit. The Proposed Project does not propose any zoning or land use changes. Please see Chapter 3, *Project Description,* of the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-65:

Please see Chapter 5, *Other CEQA Considerations,* of the Draft EIR, which evaluates the cumulative impacts of the Proposed Project in conjunction with other reasonably foreseeable future projects.

Response to Comment PC9-66:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the proposed TIA fees in comparison to other cities and stating that the fees should not deter job growth. The portion of this comment regarding jobs-producing lands is similar to, and raises the same issues as those raised in,

comment PC9-26; please refer to Response to Comment PC9-26. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-67:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is asking about using the TIA fees to fund future studies on new transportation technologies. No further response is required because the comment is asking a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-68:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is asking about the assessment of a solar hybrid monorail. Please refer to response to comment PC12-30 for additional information on monorail. No further response is required because the comment is asking a question and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC9-69:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Dear CIty Representative:

Below please find my detailed suggestions and analysis on the Mobility plan. Please also refer to attached images and renderings.

Lastly, please feel free to forward my suggestions to appropriate department(s), as needed.

Thank you!

Alexander Friedman

Hollywood, California

(323) 465-8511

INTRODUCTION

Tourists arriving into Los Angeles from all over the world are fascinated, at first. The Hollywood's Walk of Fame, beautiful Rodeo Drive of Beverly Hills, and the Pacific Ocean – all of these attractions make an impression… Until you deviate a block or two from the superficial glamour...

Welcome to City of Angels! You're now in an endless car-centric, polluted town, where pedestrians are treated like second-class citizens, and where car dominates our life. Except for a handful of small pedestrian spots (parts of Hollywood, Downtown LA, Beverly Hills, Santa Monica civic center, and the artificial outdoor malls "The Grove" and "Americana"), the "Nobody Walks in L.A." rule is still in place. Except for individual improvements in selected (and very limited!) areas, L.A. remains a suburban-type, spread-out town, with utilitarian low-rise buildings & warehouses, auto body shops & pawn shops, tattoo and smoke stores, old box-type apartment structures, plenty of blight, and an endless parade of empty concrete sidewalks. Not even mentioning countless numbers of creepy individuals & transients and drug addicts. And of course, totally inadequate public transportation doesn't make things any better... 1

Sidewalks actually exist in most areas, but their anti-pedestrian design – or rather, lack of any (!) proper urban design or decorative pavers – makes walking in L.A. extremely unappealing. And lack of efficient public transit directly causes most people to drive 24/7.

Sadly, our city municipalities still demonstrate their outdated car-only approach, and keep omitting every guideline for creating pedestrian environment, while our federal officials fail to timely supply necessary funding for construction of efficient subway network. It's time for **Metro**, as well as **City of L.A.** to step-in, and start re-building our city for people, not cars.

A. PUBLIC TRANSPORTATION 2

1) Build a Citywide Metro-Rail Network

First and foremost, not a single city in the world can sustain without a reliable public transportation network. Mass transit should mainly consist of a Rail - subway and LRT - backbone network, with feeder buses. Unfortunately, L.A. doesn't have one. A half-dozen Metro-rail lines currently provide poor connectivity; some of the rail lines run "from somewhere to nowhere" (especially the Green line). And our severely underdeveloped metro-Rail network cannot be considered even remotely adequate. 2

Without an integrated rail network, a big city cannot even be called a “city”, more like a village. And basing a city’s mass transit on buses never works, as population density, traffic, and other city-attributable factors prevent buses from efficiently transporting passengers. Our own LA’s bus system has demonstrated slow, bumpy, overcrowded service, with astonishingly long intervals (including Rapid buses). So, in order for Los Angeles' residents and visitors to rely on public transit, we need to create a **citywide network of subway and LRT lines**, not just a few extensions! - ***Please see attached** "**Appendix A - suggested Metro-Rail map.jpg...**" JPG file (which I recently developed), as a suggestion.

2) Improve Bus Service

Our bus service is overall inadequate. Buses run sporadically; schedules are generally unreliable - as congestion and boarding delays always distort the schedules times. But if during rush-hours buses run at least somewhat frequently (though 10-15 minutes is still too infrequent!) - outside rush-hours - especially evenings, nights, and weekends - bus service is virtually non-existent. Again, how can you attract car drivers into your buses by having them to wait at a dirty bus stop for as long as 20-30 minutes? And I am referring not only to MTA, but also to Santa Monica’s Big Blue Bus, Culver City Bus, etc. In fact, among large cities across the world - Los Angeles county transit system ranks as one of the worst - as far as bus service. Especially in the San Fernando Valley area. Metro has to work with federal and state officials - to increase funding, and provide much more frequent bus service, citywide, or rather - countywide. 3

3) Install Bus Shelters

Currently many bus stops throughout LA County still have no shelters; which makes waiting a nuisance – especially during rain; ultimately those lonely poles with dirty benches draw no respect from the public. A bus system is more respected if convenient, well-visible and well-lit bus shelters are offered, not barely-noticeable poles with ugly benches. The City, in collaboration with bus agencies, should provide clean, safe, and aesthetically pleasing bus-stop shelters. It’s time to give a serious facelift to our bus stops. 4

4) Re-Implement Electric Trolleybuses

Electric Trolleybuses did exist in Los Angeles in the early 20th century, so it's not a new idea for us! Those environmentally-friendly, attractive vehicles should replace some of the bus lines. 5

Trolleybuses are not only very energy-efficient and are entire pollution-free, but also their overhead wiring creates permanent transit presence on city streets, thus helping to attract more ridership and enhancing our mass transit network. Cities like San Francisco and Seattle are great examples of trolleybus implementation. I strongly urge MTA to reconsider implementing trolleybuses in LA, as it may be a great solution to improve air quality and increase ridership, while reducing the operating costs. ***Please see attached** "**Appendix C - trolleybuses in LA.pdf**" for some renderings that I created - demonstrating trolleybuses on Los Angeles streets! 5

5) Launch the Streetcars

Streetcars would also be a great benefit to LA, especially the West LA region. Now is the time automobiles should start sacrificing their road space to accommodate streetcars; the latter can run in the center of those streets, as well as near sidewalks. Great corridors would be Avenue of the Stars, Bundy Drive, Venice Blvd, and many others. Streetcars have proven to attract many riders, while beautifying our streets and giving a strong boost to our pedestrian environment, which our city currently lacks. Streetcars also are a perfect solution to the "Last-mile connection". While currently streetcars are considered for our downtown Broadway, the process has unfortunately been delayed for at least 5 years. MTA should step-in, and do all possible to speed-up the launching of Broadway streetcars. 6

B. BICYCLE NETWORK

1) Increase the Overall Bike Network

Class II Bike Lanes should be placed citywide, including both **major streets** and **side streets**. Currently LADOT is moving at a snail's pace, and many important city corridors are omitted from LADOT's plan altogether. Metro should make effort to re-evaluate LADOT's Bicycle Master Plan, and add significantly more streets to the bicycle network. Metro should also do all possible to speed-up the implementation of LA's Bicycle Master Plan. 7

2) Create Protected Bike Lanes

On city streets, bike lanes need to be **protected** - also known as "Cycle Tracks". Currently most bike lanes are still dangerous, for not only being an easy target for any car - that accidentally deviates from its car lanes, but for also being in a "Car Door-Opening" zone. The protected bike lanes are much safer in all regards. 8

3) Green Bike Lanes

Bike lanes should be painted green, as it was done in Downtown LA, and a couple of other streets. By the way, City of Santa Monica has implemented a great network of **Green-painted** bike lanes throughout its district. Metro should follow its footsteps in doing so! 9

4) Install Bike Racks

10

Bicycle parking racks need to be installed citywide, on all streets, in many locations. Please use the correct bike rack type (see attached image - for guidelines on Bike Rack standards).

C. PEDESTRIAN ENVIRONMENT

Introduction:

11

Providing comfortable, and aesthetically appealing, walkable environment is as equally important - as providing efficient public transportation. Walking in most areas of L.A. is extremely unpleasant. Damaged, uneven sidewalks, with just plain ugly concrete covering; lack of buffer zone, landscaping, and other pedestrian amenities - all of this offers no comfort to pedestrians! It's no wonder, most Angelinos still prefer to drive, rather than walk on our ugly streets. Hence a major overhaul is needed - to upgrade our sidewalks throughout the entire city.

1) Fixing Damaged, Uneven Sidewalks

12

This should be the first priority. Many sidewalks are not only Not ADA-compliant, but they are not Anyone-compliant! You literally have to watch your step every moment, because numerous cracks and uneven surface can cause you to fall down and get injured. It is appalling that so many sidewalks in our city our neglected.

2) Cover Sidewalks with Decorative Pavers

13

This is also a must! Remember, people are attracted to not just convenient location for walking, but for the **quality and aesthetics** of sidewalks. For instance, in most cities around the world, including the U.S. - but especially in Europe - sidewalks always have decorative coverings (i.e. block-stone, brick-stone, tile, etc.). Los Angeles, unfortunately, offers nothing except utilitarian concrete & cement sidewalks, which do not have any aesthetics whatsoever. Concrete & cement is often covered with gunk, gum, and goo, and encourages further dirt & filth. On the other hand, decorative pavers offers pleasant aesthetics, and encourages cleanliness and pleasant walkable conditions. As an example, our own few pedestrian districts that we have - e.g. "The Grove", "Americana", and others - are good examples of how a street can be transformed to pedestrian-oriented environment. As further examples, ***attached please find several images** (**APPENDIX D-1, D-2, and D-3**)of suggested sidewalks with pavers - for City of LA. When combined with proper landscaping and buffer zone, decoratively-paved sidewalks can do wonders!

3) Improve Landscaping

14

Providing sufficient landscaping - which includes planting trees and installing planters - is also critically important, to ensure pleasant walking environment. 14

4) Install Decorative Streetlights

Decorative streetlights also add a certain charm to a street, making it more pedestrian-friendly (again, please refer to my "Before and After" images - as an example). 15

5) Enforce Rules and Laws against Littering and Homeless

Due to our limited resources in enforcement, our sidewalks are cluttered with trash, and are abused by homeless and transients. To make walking not only appealing, but also **safe**, measures should be taken immediately! Homeless and transients should never ever be allowed to loiter, litter our sidewalks, and especially - to place homeless encampments! If they do, they should be fined and taken away. Likewise, pedestrians in general should not be allowed to litter, either. Anyone caught littering or trashing a sidewalk, should also be fined. Most people have been getting away with total impunity, hence our ugly & dirty streets! 16

6) Place Trash Receptacles

In many instances, lack of trash cans can provoke extra littering. Hence it is imperative to place trash receptacles in appropriate places and at appropriate distances, especially near restaurants / food courts. 17

7) Create Public Plazas and Squares

One of the reasons L.A. remains so unappealing for pedestrians is because there are very few walkable places in general - no plazas, no squares. In European cities, for instance, pedestrian life has always been successful and pleasant - because of abundance of public squares, plazas, and other types of pedestrian space. This is where Los Angeles needs to learn from other cities around the world. Creating safe, aesthetically pleasant public areas will dramatically transform our car-crazed, UNwalkable suburban town, into a pedestrian-oriented city. It is time for a serious change! 18

D. CROSSWALKS

1) Eliminate that "Pedestrian" Button

Most crosswalks in L.A. still have outdated "pedestrian-crossing" button. Meaning, the light to cross for a pedestrian would not turn Green, unless the button is pressed. This feature is decades-old, and needs to be eliminated, especially in popular pedestrian areas! It's time to get on-board with the rest of the world, and eliminate those needless, outdated "Pedestrian" buttons - to improve walkable environment and improve safety. Instead, a "Pedestrian" light 19

should automatically turn Green for people, once cars get their Green light. Currently only a handful of intersections in L.A. have automatically turn Green for pedestrians without button. 19

2) Increase Crosswalk Timing for Pedestrians

Most intersection in L.A. have too short of a time period for pedestrians. This becomes problematic for elderly and people with disabilities. Timing should be increased for people, to provide safe crossing and encourage walking. 20

3) Place Continental Crosswalks - Citywide!

City of L.A. is gradually installing continental ("Zebra") crosswalks throughout the city. However, this process takes way too long, and unfortunately - is not likely to happen on all streets. In reality, every single intersection needs to have Continental crossing, as it adds safety for pedestrians, while adding visibility for motorists. 21

E. MIXED-USE DEVELOPMENTS

We must continuously support new mixed-use developments, which includes transit-oriented developments (TOD). Those developments promote walkable conditions and greatly transform a given area, from blight into upscale living! New developments - including TOD's - are a major game changer for Los Angeles. 22

CONCLUSION

So, what conclusions can we draw? Is there hope for Los Angeles to become like other cities – a walkable, pleasant place with reliable transportation? Or, will our city continue to be dominated by the auto? With the way things appear, and with barely any transit improvements under way (including extremely long construction times for Purple line), the answer is – yes, Cars will unfortunately continue to be the predominantly main way of getting around LA, and traffic will continue getting worse, and worse, and worse. 23

But if we seriously want to change the way Angelinos get around, if we truly want to change our mentality and attitude towards public transportation, walking, and biking, **we need a major overhaul**! Quality of life in a city depends upon quality of mass transit, so investing into our mass transit ultimately means – investing into our quality of life. I do have hopes that the politicians – city, state, and federal – will start thinking objectively, will make the right decisions by shifting their focus - from highways - to mass transit and walking; and that they will provide necessary and immediate funding for our projects. And like other countries, there is a great possibility Los Angeles will finally get a real public transportation system, with vast Subway & LRT expansion, reliable bus & trolleybus service, streetcars, bicycling conditions, and major sidewalk improvements, making the City of Angels a great place to live, work, and visit!

Los Angeles' population ranks the second in the country, just following New York City. Perhaps L.A. can learn from New York how to create walkable streets. Time for a transition, Los Angeles! Time to upgrade from car-dependence to reliable public transit; from dangerous roads to safe sidewalks and parks; from endless concrete to aesthetical streetscape; from ugly box warehouses to beautiful & architecturally rich buildings; from creepy "Tattoo" and "Smoke" shops to upscale retail centers; and from cheap & health-degrading fast-food stands to family-friendly restaurants. 23

Popularity of The Grove and Americana has proven the dire need of creating pedestrian spaces with retail centers. But instead of building artificial limited areas (The Grove and Americana) – where people are forced to walk in circles – the city as a whole should follow the concept of that same Grove and Americana. Those places are highly popular, stylish, safe, and have proven to work well in urban environments. After all, European cities are built that same way; The Grove and Americana are actually a replica of European design standards. 24

We need walkable streets. Our sidewalks need a serious overhaul. And we need family-friendly parks and public plazas. No doubt, it's time for Los Angeles to catch-up to the rest of the world!

Thank you for reviewing my comments and analysis.

- Alexander

PC10 Alexander Friedman 1/12/2016

Response to Comment PC10-1:

The comment, including the attached images and renderings, is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Please see responses to specific comments below.

Response to Comment PC10-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is making a policy argument regarding the need for citywide network of subway and LRT lines. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC10-3:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that more bus transit service is needed. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC10-4:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that more transit amenities, such as bus shelters, are needed. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC10-5:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that Metro consider implementing trolleybuses in Los Angeles. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC10-6:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that streetcars be implemented on select corridors in the Specific Plan areas as well as elsewhere in the City. No further

response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC10-7:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that bicycle lanes be implemented Citywide and that Metro help to implement the City's Bike Plan. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC10-8:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating a preference for protected bicycle lanes, or cycle tracks, over standard on-street bicycle lanes. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC10-9:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that bike lanes should be painted green as the City implemented in Downtown LA. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC10-10:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that additional bicycle parking be provided citywide. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC10-11:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that pedestrian improvements be implemented to create a walkable environment. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC10-12:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that the city fix damaged sidewalks. On April 1, 2015, the City of Los Angeles pledged to spend more than $1.3 billion over the next three decades to fix the backlog of broken sidewalks and make other improvements to help those with disabilities navigate the city. The proposed agreement would resolve a lawsuit filed by attorneys for the disabled, who argued that crumbling, impassable sidewalks and other barriers prevented people in wheelchairs or others with mobility impairments from accessing public pathways in violation of the Americans With Disabilities Act. (The final terms must still be approved by a federal judge.) No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC10-13:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that decorative pavers be used on sidewalks. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC10-14:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that landscaping be provided to create a walkable environment. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC10-15:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that decorative street lights be provided to create a walkable environment. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC10-16:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Chapter 3, *Project Description,* of the Draft EIR for the project objectives and the project description. Laws and regulations pertaining to littering and homeless issues are not within the scope of the CTCSP or WLA TIMP Project.

Response to Comment PC10-17:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that trash receptacles be placed at appropriate locations. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC10-18:

The content of this comment is similar to, and raises the same issues as those raised in, comment PC10-11; please refer to Response to Comment PC10-11.

Response to Comment PC10-19:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting pedestrian push buttons be eliminated at signalized intersections ant that pedestrians always receive the walk sign. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC10-20:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that pedestrian crossing times be extended at signalized intersections to provide more walk time. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC10-21:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that continental crosswalks be provided throughout the City. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC10-22:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The proposed transportation improvements would be compatible with TOD, and would reduce vehicle trip generation and vehicle miles traveled. Please see Chapter 3, *Project Description,* of the Draft EIR for the project objectives and the project description.

Response to Comment PC10-23:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC10-24:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

From: Alek [mailto:alek3000@sbcglobal.net]
Sent: Tuesday, January 19, 2016 11:10 AM
To: Sarah Brandenberg
Subject: Re: [Additional Feedback] ENV-2014-1458-EIR - Westside Mobility Plan
Importance: High

Dear Sarah:

I have just reviewed the 233-page "Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West L.A. Transportation Improvement an Mitigation Specific Plan". Looks truly impressive! 1

I especially like the **Venice Blvd** options - specifically the proposed reduction of travel lanes, and buffering the existing Class II Bike Lane - to become a separated, buffered Cycle Track. This is a great idea!

In addition, I have one more suggestion for Venice Blvd. As I'm sure you know, Venice Blvd had ran an electric streetcar / Pacific Electric trains; this is one of the reasons Venice Blvd is so wide. Currently, however, Venice Blvd offers just mediocre bus service (sorry, those Rapids are just as ineffective, as most of the mass transit in LA County!). This is why **it is imperative to reestablish some kind of reliable service** - with permanent electric trains, or other electric vehicles - on Venice Blvd! 2

I would like to propose three options on reestablishing reliable public transit, with electric vehicles:

(1) Light-Rail (LRT);

(2) Streetcars (Trams);

(3) Electric Trolleybuses (ETB) - optimal 3

The advantage of having an electric transit vehicle - is the permanent presence of overhead wiring (whether LRT, Streetcar, or ETB). Overhead wiring gives riders / potential passengers an assurance of permanent presence, while promoting development and economic investment. All cities around the world that have one of those options have a much better developed infrastructure. So, let's discuss those in greater detail.

OPTION #1: Light-Rail (LRT) 4

This is perhaps the most reliable mass transit option. An example of such would be our LACMTA Blue Line, Expo Line, Gold Line, etc. Fewer stops, fastest speed, and highest (of the 3 options) passenger capacity make

this mode of transit superior. However, this may duplicate the soon-to-open Expo Line Phase II. Therefore, this option might not be possible for Venice Blvd specifically, and may be cost prohibitive. 4

OPTION #2: Streetcars (Trams):

While this concept is currently in developments stage for Los Angeles, streetcars have been widely used all over the world - especially Europe. Streetcars are also used in many American cities - including Seattle, Portland, San Francisco, etc. Currently a streetcar line is being proposed for downtown L.A.'s Broadway district. In general, streetcars are optimal for high-density corridors, with popular pedestrian areas; streetcars also have slower speeds - comparing to LRT. As far as Venice Blvd, a streetcar may work; however, Venice Blvd lacks necessary density and offers very minimal pedestrian activity or amenities in order to qualify for a Streetcar project. Therefore, again, streetcars may not be the optimal choice for Venice Blvd - even though it would be a definite improvement over its current inadequate bus service. 5

OPTION #3: Electric Trolleybuses (ETB) - OPTIMAL SOLUTION:

Electric trolleybus is a "hybrid" between a bus and a light-rail vehicle (***please see attached** renderings and photos of trolleybuses). While sharing the road with other vehicles, a trolleybus does require an overhead electrical wiring system, thus the vehicles are 100% pollution-free. Trolleybuses are not a new concept for Los Angeles; they did exist in the early 20th century, until the 1960's. In the 1990's the concept had a comeback; here is a link with useful information: http://www.erha.org/rtdetb.html

Electric Trolleybuses could be the optimal solution for Venice Blvd, as a part of Westside Mobility Plan. While providing permanent presence of a transit line on the street (thanks to the overhead wiring), trolleybuses are entirely pollution-free, and will promote sustainable development along the corridor.

Unfortunately, our current CNG buses aren't doing the trick. Yes, they're maybe somewhat efficient... and somewhat environmentally friendly... but buses will never be as attractive, environmentally clean, or reliable to riders as trolleybuses are. Lack of overhead wiring - i.e. a fixed guideway - is one of the main reasons. Hence the vast majority of middle- and upper-class population prefers to drive, instead of riding on our clumsy CNG buses. 6

Electric trolleybus systems are very inexpensive to build and maintain. Overhead wiring and power supply are perhaps the only capital investment, and funding can be used from Measure R revenue and/or federal sources. Once the wiring is installed and power supplies are placed, operating costs become significantly lower. Electric trolleybuses are very energy-efficient; their overhead wires draw power from central electrical power supply sources, costing less than bus fuel – even CNG.

Here are some advantages of electric trolleybuses:

1) They're inexpensive to implement. While electric trolleybuses originally cost more per vehicle, in the long run they save Metro tons of money due to lower overhead costs. In addition, many existing CNG buses can also be converted to electric trolleybuses, thus saving on procurement costs;

2) Trolleybuses are very energy-efficient, electrical costs are lower than fuel cost of CNG buses;

3) They are 100% pollution-free – which is especially important for our smog-chocked L.A.;

4) Vehicles run very quietly, producing only minimal noise, especially comparing to buses;

5) Their acceleration and braking is very smooth, yet more powerful than buses;

6) Trolleybus vehicles are technologically-advanced and are more attractive to public, drawing higher

ridership than buses. In fact, no matter how sophisticated CNG buses get, trolleybuses always win in customer preference;

7) Overhead wiring creates a fixed transit-way, spurring development and revitalization on a given corridor;

8) Overhead wiring also means a permanent presence of reliable transit on the street. This is a crucial factor from passengers' perspective, and helps attracting ridership even further. Just compare a street with traditional buses (they might arrive, but can also deviate anywhere, at any time) – versus a trolleybus corridor (overhead wires tell us that transit is here for many years, and will not deviate elsewhere!)

9) Among innovative transportation, electric trolleybuses require the least investment – comparing to streetcars, light-rail, or subway. Operating costs are also some of the lowest, especially comparing to buses;

10) Trolleybuses' life span is higher than buses;

11) Maintenance of trolleybuses is insignificant comparing to buses (with fuel-based engines and transmission).

6

Trolleybuses need to be considered for Venice Blvd. This reliable, fast, attractive, powerful, and environmentally friendly mode of transit will give a strong "facelift" to our mass transit system, and is all but certain to draw significantly higher ridership, while promoting economic development.

Thank you for reviewing my additional comments!

Sincerely,

- *Alexander Friedman*
(323) 465-8511

Hollywood, California

Dear CIty Representative:

Below please find my detailed suggestions and analysis on the Mobility plan. Please also refer to attached images and renderings.

Lastly, please feel free to forward my suggestions to appropriate department(s), as needed.

Thank you!

Alexander Friedman

Hollywood, California

(323) 465-8511

INTRODUCTION

Tourists arriving into Los Angeles from all over the world are fascinated, at first. The Hollywood's Walk of Fame, beautiful Rodeo Drive of Beverly Hills, and the Pacific Ocean – all of these attractions make an impression… Until you deviate a block or two from the superficial glamour...

Welcome to City of Angels! You're now in an endless car-centric, polluted town, where pedestrians are treated like second-class citizens, and where car dominates our life. Except for a handful of small pedestrian spots (parts of Hollywood, Downtown LA, Beverly Hills, Santa Monica civic center, and the artificial outdoor malls "The Grove" and "Americana"), the "Nobody Walks in L.A." rule is still in place. Except for individual improvements in selected (and very limited!) areas, L.A. remains a suburban-type, spread-out town, with utilitarian low-rise buildings & warehouses, auto body shops & pawn shops, tattoo and smoke stores, old box-type apartment structures, plenty of blight, and an endless parade of empty concrete sidewalks. Not even mentioning countless numbers of creepy individuals & transients and drug addicts. And of course, totally inadequate public transportation doesn't make things any better...

Sidewalks actually exist in most areas, but their anti-pedestrian design – or rather, lack of any (!) proper urban design or decorative pavers – makes walking in L.A. extremely unappealing. And lack of efficient public transit directly causes most people to drive 24/7. 7

Sadly, our city municipalities still demonstrate their outdated car-only approach, and keep omitting every guideline for creating pedestrian environment, while our federal officials fail to timely supply necessary funding for construction of efficient subway network. It's time for **Metro**, as well as **City of L.A.** to step-in, and start re-building our city for people, not cars.

A. PUBLIC TRANSPORTATION

1) Build a Citywide Metro-Rail Network

First and foremost, not a single city in the world can sustain without a reliable public transportation network. Mass transit should mainly consist of a Rail - subway and LRT - backbone network, with feeder buses. Unfortunately, L.A. doesn't have one. A half-dozen Metro-rail lines currently provide poor connectivity; some of the rail lines run "from somewhere to nowhere" (especially the Green line). And our severely underdeveloped metro-Rail network cannot be considered even remotely adequate.

Without an integrated rail network, a big city cannot even be called a "city", more like a village. And basing a city's mass transit on buses never works, as population density, traffic, and other city-attributable factors prevent buses from efficiently transporting passengers. Our own LA's bus system has demonstrated slow, bumpy, overcrowded service, with astonishingly long intervals (including Rapid buses). So, in order for Los

Angeles' residents and visitors to rely on public transit, we need to create a **citywide network of subway and LRT lines**, not just a few extensions! - ***Please see attached** "**Appendix A - suggested Metro-Rail map.jpg...**" JPG file (which I recently developed), as a suggestion.

2) Improve Bus Service

Our bus service is overall inadequate. Buses run sporadically; schedules are generally unreliable - as congestion and boarding delays always distort the schedules times. But if during rush-hours buses run at least somewhat frequently (though 10-15 minutes is still too infrequent!) - outside rush-hours - especially evenings, nights, and weekends - bus service is virtually non-existent. Again, how can you attract car drivers into your buses by having them to wait at a dirty bus stop for as long as 20-30 minutes? And I am referring not only to MTA, but also to Santa Monica's Big Blue Bus, Culver City Bus, etc. In fact, among large cities across the world - Los Angeles county transit system ranks as one of the worst - as far as bus service. Especially in the San Fernando Valley area. Metro has to work with federal and state officials - to increase funding, and provide much more frequent bus service, citywide, or rather - countywide.

3) Install Bus Shelters

Currently many bus stops throughout LA County still have no shelters; which makes waiting a nuisance – especially during rain; ultimately those lonely poles with dirty benches draw no respect from the public. A bus system is more respected if convenient, well-visible and well-lit bus shelters are offered, not barely-noticeable poles with ugly benches. The City, in collaboration with bus agencies, should provide clean, safe, and aesthetically pleasing bus-stop shelters. It's time to give a serious facelift to our bus stops. 7

4) Re-Implement Electric Trolleybuses

Electric Trolleybuses did exist in Los Angeles in the early 20th century, so it's not a new idea for us! Those environmentally-friendly, attractive vehicles should replace some of the bus lines. Trolleybuses are not only very energy-efficient and are entire pollution-free, but also their overhead wiring creates permanent transit presence on city streets, thus helping to attract more ridership and enhancing our mass transit network. Cities like San Francisco and Seattle are great examples of trolleybus implementation. I strongly urge MTA to reconsider implementing trolleybuses in LA, as it may be a great solution to improve air quality and increase ridership, while reducing the operating costs. ***Please see attached** "**Appendix C - trolleybuses in LA.pdf**" for some renderings that I created - demonstrating trolleybuses on Los Angeles streets!

5) Launch the Streetcars

Streetcars would also be a great benefit to LA, especially the West LA region. Now is the time automobiles should start sacrificing their road space to accommodate streetcars; the latter can run in the center of those streets, as well as near sidewalks. Great corridors would be Avenue of the Stars, Bundy Drive, Venice Blvd, and many others. Streetcars have proven to attract many riders, while beautifying our streets and giving a strong boost to our pedestrian environment, which our city currently lacks. Streetcars also are a perfect solution to the "Last-mile connection". While currently streetcars are considered for our downtown Broadway, the process has unfortunately been delayed for at least 5 years. MTA should step-in, and do all possible to speed-up the launching of Broadway streetcars.

B. BICYCLE NETWORK

1) Increase the Overall Bike Network

Class II Bike Lanes should be placed citywide, including both **major streets** and **side streets**. Currently LADOT is moving at a snail's pace, and many important city corridors are omitted from LADOT's plan altogether. Metro should make effort to re-evaluate LADOT's Bicycle Master Plan, and add significantly more streets to the bicycle network. Metro should also do all possible to speed-up the implementation of LA's Bicycle Master Plan.

2) Create Protected Bike Lanes

On city streets, bike lanes need to be **protected** - also known as "Cycle Tracks". Currently most bike lanes are still dangerous, for not only being an easy target for any car - that accidentally deviates from its car lanes, but for also being in a "Car Door-Opening" zone. The protected bike lanes are much safer in all regards.

3) Green Bike Lanes

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Bike lanes should be painted green, as it was done in Downtown LA, and a couple of other streets. By the way, City of Santa Monica has implemented a great network of **Green-painted** bike lanes throughout its district. Metro should follow its footsteps in doing so!

4) Install Bike Racks

Bicycle parking racks need to be installed citywide, on all streets, in many locations. Please use the correct bike rack type (see attached image - for guidelines on Bike Rack standards).

C. PEDESTRIAN ENVIRONMENT

Introduction:

Providing comfortable, and aesthetically appealing, walkable environment is as equally important - as providing efficient public transportation. Walking in most areas of L.A. is extremely unpleasant. Damaged, uneven sidewalks, with just plain ugly concrete covering; lack of buffer zone, landscaping, and other pedestrian amenities - all of this offers no comfort to pedestrians! It's no wonder, most Angelinos still prefer to drive, rather than walk on our ugly streets. Hence a major overhaul is needed - to upgrade our sidewalks throughout the entire city.

1) Fixing Damaged, Uneven Sidewalks

This should be the first priority. Many sidewalks are not only Not ADA-compliant, but they are not Anyone-compliant! You literally have to watch your step every moment, because numerous cracks and uneven surface can cause you to fall down and get injured. It is appalling that so many sidewalks in our city our neglected.

2) Cover Sidewalks with Decorative Pavers

This is also a must! Remember, people are attracted to not just convenient location for walking, but for the **quality and aesthetics** of sidewalks. For instance, in most cities around the world, including the U.S. - but especially in Europe - sidewalks always have decorative coverings (i.e. block-stone, brick-stone, tile, etc.). Los Angeles, unfortunately, offers nothing except utilitarian concrete & cement sidewalks, which do not have any aesthetics whatsoever. Concrete & cement is often covered with gunk, gum, and goo, and encourages further dirt & filth. On the other hand, decorative pavers offers pleasant aesthetics, and encourages cleanliness and pleasant walkable conditions. As an example, our own few pedestrian districts that we have - e.g. "The Grove", "Americana", and others - are good examples of how a street can be transformed to pedestrian-oriented environment. As further examples, ***attached please find several images** (**APPENDIX D-1, D-2, and D-3**)of suggested sidewalks with pavers - for City of LA. When combined with proper landscaping and buffer zone, decoratively-paved sidewalks can do wonders!

3) Improve Landscaping

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Providing sufficient landscaping - which includes planting trees and installing planters - is also critically important, to ensure pleasant walking environment.

4) Install Decorative Streetlights

Decorative streetlights also add a certain charm to a street, making it more pedestrian-friendly (again, please refer to my "Before and After" images - as an example).

5) Enforce Rules and Laws against Littering and Homeless

Due to our limited resources in enforcement, our sidewalks are cluttered with trash, and are abused by homeless and transients. To make walking not only appealing, but also **safe**, measures should be taken immediately! Homeless and transients should never ever be allowed to loiter, litter our sidewalks, and especially - to place homeless encampments! If they do, they should be fined and taken away. Likewise, pedestrians in general should not be allowed to litter, either. Anyone caught littering or trashing a sidewalk, should also be fined. Most people have been getting away with total impunity, hence our ugly & dirty streets!

6) Place Trash Receptacles

In many instances, lack of trash cans can provoke extra littering. Hence it is imperative to place trash receptacles in appropriate places and at appropriate distances, especially near restaurants / food courts.

7) Create Public Plazas and Squares

One of the reasons L.A. remains so unappealing for pedestrians is because there are very few walkable places in general - no plazas, no squares. In European cities, for instance, pedestrian life has always been successful and pleasant - because of abundance of public squares, plazas, and other types of pedestrian space. This is where Los Angeles needs to learn from other cities around the world. Creating safe, aesthetically pleasant public areas will dramatically transform our car-crazed, UNwalkable suburban town, into a pedestrian-oriented city. It is time for a serious change!

D. CROSSWALKS

1) Eliminate that "Pedestrian" Button

Most crosswalks in L.A. still have outdated "pedestrian-crossing" button. Meaning, the light to cross for a pedestrian would not turn Green, unless the button is pressed. This feature is decades-old, and needs to be eliminated, especially in popular pedestrian areas! It's time to get on-board with the rest of the world, and eliminate those needless, outdated "Pedestrian" buttons - to improve walkable environment and improve safety. Instead, a "Pedestrian" light should automatically turn Green for people, once cars get their Green light. Currently only a handful of intersections in L.A. have automatically turn Green for pedestrians without button. 7

2) Increase Crosswalk Timing for Pedestrians

Most intersection in L.A. have too short of a time period for pedestrians. This becomes problematic for elderly and people with disabilities. Timing should be increased for people, to provide safe crossing and encourage walking.

3) Place Continental Crosswalks - Citywide!

City of L.A. is gradually installing continental ("Zebra") crosswalks throughout the city. However, this process takes way too long, and unfortunately - is not likely to happen on all streets. In reality, every single intersection needs to have Continental crossing, as it adds safety for pedestrians, while adding visibility for motorists.

E. MIXED-USE DEVELOPMENTS

We must continuously support new mixed-use developments, which includes transit-oriented developments (TOD). Those developments promote walkable conditions and greatly transform a given area, from blight into upscale living! New developments - including TOD's - are a major game changer for Los Angeles.

CONCLUSION

So, what conclusions can we draw? Is there hope for Los Angeles to become like other cities – a walkable, pleasant place with reliable transportation? Or, will our city continue to be dominated by the auto? With the way things appear, and with barely any transit improvements under way (including extremely long construction times for Purple line), the answer is – yes, Cars will unfortunately continue to be the predominantly main way of getting around LA, and traffic will continue getting worse, and worse, and worse.

But if we seriously want to change the way Angelinos get around, if we truly want to change our mentality and attitude towards public transportation, walking, and biking, **we need a major overhaul**! Quality of life in a city depends upon quality of mass transit, so investing into our mass transit ultimately means – investing into our quality of life. I do have hopes that the politicians – city, state, and federal – will start thinking objectively, will make the right decisions by shifting their focus - from highways - to mass transit and walking; and that they will provide necessary and immediate funding for our projects. And like other countries, there is a great possibility Los Angeles will finally get a real public transportation system, with vast Subway & LRT expansion, reliable bus & trolleybus service, streetcars, bicycling conditions, and major sidewalk improvements, making the City of Angels a great place to live, work, and visit!

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Los Angeles' population ranks the second in the country, just following New York City. Perhaps L.A. can learn from New York how to create walkable streets. Time for a transition, Los Angeles! Time to upgrade from car-dependence to reliable public transit; from dangerous roads to safe sidewalks and parks; from endless concrete to aesthetical streetscape; from ugly box warehouses to beautiful & architecturally rich buildings; from creepy "Tattoo" and "Smoke" shops to upscale retail centers; and from cheap & health-degrading fast-food stands to family-friendly restaurants.

Popularity of The Grove and Americana has proven the dire need of creating pedestrian spaces with retail centers. But instead of building artificial limited areas (The Grove and Americana) – where people are forced to walk in circles – the city as a whole should follow the concept of that same Grove and Americana. Those places are highly popular, stylish, safe, and have proven to work well in urban environments. After all, European cities are built that same way; The Grove and Americana are actually a replica of European design standards.

We need walkable streets. Our sidewalks need a serious overhaul. And we need family-friendly parks and public plazas. No doubt, it's time for Los Angeles to catch-up to the rest of the world!

Thank you for reviewing my comments and analysis.

- Alexander

PC11 Alexander Friedman 1/19/2016

Response to Comment PC11-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC11-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that electric trains, or other electric vehicles, be installed on Venice Boulevard. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC11-3:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that electric vehicles be implemented through light rail, streetcars, and electric trolleybuses. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC11-4:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that LRT is a reliable mass transit option but also costly. LRT was studied as an alternative in the Draft EIR (see Chapter 6, *Alternatives,* page 6-9). The Draft EIR concluded that the costs associated with LRT would be so high as to hinder the TIA fee program's ability to partially fund and build out a comprehensive transportation multimodal network on the Westside. For this reason, the LRT alternative was not carried forward for analysis in the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC11-5:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that streetcars may be a viable transit option for Venice Boulevard although the corridor may lack the densities typical for streetcar service. It is expected that streetcars would be significantly more expensive than the transportation improvements that are included in the Proposed Project lists, and likely similar to the cost of LRT, which was studied as an alternative in the Draft EIR. The Draft EIR concluded that the costs associated

with LRT on Sepulveda Boulevard and Lincoln Boulevard would be so high as to hinder the TIA fee program's ability to partially fund and build out a comprehensive transportation multimodal network on the Westside. For this reason, the LRT alternative was not carried forward for analysis in the Draft EIR. Similar conclusions would apply to streetcars. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC11-6:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that electric trolleybuses may be the optimal transit option for Venice Boulevard. As described in the introduction to Chapter 4, *Environmental Impacts*, of the Draft EIR, the improvements and programs on the specific plan project lists are not entitled or constructed as part of this project. This is a specific plan that includes a list of improvements that are eligible to be built with the proposed mitigation fee. What ultimately gets built and when will be based on future policy decisions. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC11-7:

The content of this comment is identical to Comment Letter PC10; please refer to the response to Comment Letter PC10.

Letter PC12

Date: March 7, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

From: Bill Pope
3277 Inglewood Boulevard
Los Angeles, CA 90066

Subject: Comments on proposed update of the Coastal Transportation Corridor Specific Plan and the West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

Below are my comments on the above referenced Transportation Specific Plans (TSPs). These are submitted during the Public Comment Period for these TSPs.

The proposed TSPs are replacements for prior versions of these same-named TSPs adopted in 1993 and 1997 respectively. The proposed TSPs define a set of Transportation [improvement] Projects to be undertaken by the City and the Transportation Impact Assessment (TIA) Fee to be paid by developers for each net-new trip to be added by a land development project to cover the costs of the Transportation [improvement] Projects proposed.

The TSPs should be adopted only if:

- the Transportation Projects proposed meet the goals and objectives set by the State, the Mayor, the City Council, and the constituents effected by the TSPs,
- the TIA Fee proposed is based on improvements which meet the above referenced goals and increase the people-movement capacity of the transportation system to accommodate at satisfactory levels of service both today's excess trip demand and the trips to be added through 2030.
- the total cost of the goal-meeting improvements is known, and
- the number of trips used to prorate the total costs of the planned Transportation [improvement] Projects down to a per-trip TIA Fee are based on realistic estimates of the total additional trips that need to be accommodated by 2030.

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After careful review of the proposed TSP's, and the other policy documents included by reference, such as LADOT's Traffic Study Policies and Procedures, I find that the TSP's:

- do NOT meet the goals and objectives set by the State, the Mayor, the City Council, and the constituents affected by the TSP's,
- provide no evidence that the proposed Transportation Projects will accommodate existing or the net-new trips to be added by 2030, and
- are based on Institution of Transportation Engineers Peak Hour Trip Rates which do NOT represent the total demand that LA-based density-increasing land development projects will place on LA's transportation infrastructure.

Therefore the TIA Fees proposed, and the exceptions and credits offered:

- are NOT based on goal-meeting transportation improvement projects, and
- can NOT be determined until a set of improvements which do meet the goals and objectives required of the TSP's, and which can accommodate existing excess demand and the net-new trips to be added by 2030, are selected and designed.

Therefore the TSPs can NOT be adopted at this time because there is no nexus between the TIA Fees proposed and the Transportation Improvement Project required to meet the required goals.

The above points are discussed in more detail below.

Do Transportation Improvement Projects proposed meet Goals?

Goal Source	Goal	Do Transportation Improvement Projects proposed meet Goals?	
State.	Reduce Greenhouse Gas (GHG) emissions to 1990 level by 2020. - 2006 AB 32 & SB 375.	**No.** I found no evidence that this goal was addressed.	2
	Reduce Greenhouse Gas (GHG) emissions 40% below 1990 level by 2030. - Executive Order 4-29-2015	**No.** The proposed projects reduce GHG emission by less than 1%, from 974,627 to 965,306 MT/yr. (Note: The large drop in Metric Tons/yr between Existing Conditions and Future without Project is due to improvements in automobile fuel efficiency, NOT the proposed Transportation Improvements. -DEIR p. 4.3-18	3
	Complete Streets Act - AB 1358, 2008 • Increased Transportation Choices. • Economic Revitalization. • Improved Return on Infrastructure Investments • Livable Communities (Reduce residential cut-thru traffic.) • Improved Safety for All Users. (Reduce car speed.) • Protected Bike-paths. • More Walking and Bicycling to Improve Public Health. • Greenhouse Gas Reduction and Improved Air Quality	Answers are from the DEIR. Yes **Not** where street parking lost to BRTs. ? **No!** BRTs will increase cut-thru traffic. **Will meet goal** by increasing congestion. Yes, buy benefits only 1% of commuters. *May* increase bike commuting to 1.6%. **No.** Current with project emission will be increased. Future w Project reduction= less than 1%	4 5 6 7 8 9 10 11
	Reduce Vehicle Miles Traveled (VMT) 15%. - SB 743	**No.** Total City reduction is only 2.1%. - DEIR p. 4.3-20.	12
Mayor	"Great Streets" Directive. - Build a World-Class transportation infrastructure.	**No.** Bus Lanes are NOT World Class. **Countries are moving to Monorails. Japan has 10, Europe 10,China 4, South Korea 3, Brazil 2, UK 2, UAE , India 1, Russia 1, etc.**	13
	"Vision Zero" - No transportation-related fatalities.	**No.** TSP's propose North-South Light Rail. Light Rail running at grade has killed up to 100 people in LA a year.	14
City Council	"The LA City Council directed LADOT, in conjunction with the Dept of City Planning, to develop solutions and long-term plans to respond to **congestion** and mobility challenges."	**No.** The % of Unsatisfactory (LOS E or F) Road Segments will increase as follows:	15
Constituents	Public Comments from the Scoping meetings are summed up this way in the DEIR, "For the Proposed Project, there is general agreement that mobility on the Westside is in need of improvement. Environmental issues of concern raised during the scoping process focused on aspects of transportation and **traffic**, including circulation, vehicle [street] capacity, and **congestion**." - DEIR 1.7		16
Mobility Plan Website.	The primary objective of the Plan is to **increase the capacity and efficiency of the transportation system** through multimodal solutions, including transit, bicycle and pedestrian-friendly facilities. - http://www.westsidemobilityplan.com/wp-content/uploads/2016/01/How-We-Got-Here-Station.pdf	No evidence was given in the TSPs or DEIR that people-movement capacity will be increased. My studies indicate capacity will be reduced 45% on BRT streets if Left-turns are allowed, and there will be no significant net gain if not allowed.	17

	Existing	With Project	Future	With Project
AM	21%	24%	24%	29%
PM	29%	34%	34%	40%

Source: DEIR Appendix G. Analysis of Project Impact Compared to Existing Conditions; page G-2. - CDM Smith

Furthermore, the DEIR says the TSPs will make significant and unavoidable adverse impacts to Circulation, Neighborhood Intrusion, Congestion Management Plans and Emergency Access. p. 2-5. 18

Will the Transportation Improvement Projects proposed improve People-movement Capacity?

The TSPs propose center-running Bus Rapid Transit lanes for Sepulveda and Lincoln Boulevards. This would convert the center Left Turn lane into the passenger loading area and give the two center-most through lanes exclusively to buses. While the LA Dept. of City Planning (DCP) and the Fehr and Peers claim that there will still be two lanes left for through-traffic, one will be what is now the Right Turn - Parking Lane, and the other will be one of the existing Through-lanes.

I found no discussion of people-movement capacity in either the TSPs or DEIR that will result from this arrangement. Therefore, I conducted traffic studies and developed a mathematical model of this arrangement and found the following: 19

- A Through-lane can move 843 people with 1.15 people/car at the current arterial speed of 10 MPH.
- The same lane can move 832 people in 57-passenger buses in dedicated lanes averaging 20 MPH if buses are run at 4 minute headways (about twice as often as existing buses run) and all seats are filled.
- But the lane will move only 467 people if the City only finds ridership practical to buys enough new, Left-side-loading buses to run them at the same 7.3 minute headway that Santa Monica and Culver City buses currently run on Sepulveda. (LA City currently runs no buses on Sepulveda or Lincoln.)

So giving lanes to buses does not increase capacity and will likely reduce capacity for those lanes.

However, because the remaining private-vehicle Through-lanes would need to accommodate both through traffic and turning traffic, capacity will be lost.

- The Right-Turn -Through-Traffic combination lane would be blocked to through traffic 56% of the time by Right-turning traffic blocked by pedestrians crossing the orthogonal street, reducing Through capacity to 44%.
- A Left-Turn-Though-Traffic combination lane would be blocked to through traffic 90% of the time leaving 10% capacity for Through traffic. 20

So giving the center-Left-Turn-Lane and one center Through-Traffic lane each direction to buses would reduce the people-movement capacity of the arterial by:

- **45% if Left-turns are still allowed and buses are run at today's 7 to 8 minute headways, or**
- **24% if Left-turns are still allowed and buses are run at 4 minute headways, or**
- **8% if Left-Turns are <u>not</u> allowed and buses are run at today's 7 to 8 minute headways.**

A 13% capacity increase is achieved only if the City buy enough left-loading buses to run them at 4 minute headways, which ridership may not support, and disallows Left Turns, which will push more arterial traffic onto residential Collector streets.

It appears that giving lanes to buses is NOT the answer.

Should the Transportation System required by based on ITE Peak Hour Trip Rate Estimates?

No!

The Institute of Transportation Engineers (ITE) Peak Hour Trip Generation Rates are NOT a measure of how many commuters <u>want to travel</u> during the Peak traffic Hour. They are only a measure of how many <u>CAN</u> travel during the most congested hour of the day. Furthermore, ITE Trip Rates are not applicable to LA today. They are based on observations of traffic entering or leaving projects built: 21

- In cities with better mass transit options than are available to L.A. commuters,
- In cities where two incomes, and therefore the likelihood of two commuters, are not required to purchase a new home (none of the studies in the 8 Edition were done in California, much less in LA), and
- Include counts as far back as the 1960's when two-career-families was not the norm.

If Peak Hour studies were done in LA, they would only measure congestion-constrained flow, not true demand. The World Class Transit system we need must accommodate total existing over-capacity demand plus total new demand to be added between now and 2030 or beyond. 21

Total demand would be better estimated by the number of average LA incomes required to qualify for the loan to purchase the average LA house or Condo, or the number of incomes, and therefore the likely number of commuters, required to rent an LA apartment in each part of town or each priced range.

This information can be obtained from banks. These numbers would then be reduced by the percentage of income-producers who work at home, which can be obtained for census data (6% in 2010), to arrive at the likely number of real trips generated by each type of residential development project. 22

The real trip demand numbers would then be used to design the transit systems required, and TIA Fee would then be determined based on the cost of the system needed to accommodate the real demand.

Do the TSPs, and their referenced procedures documents, meet the TSPs' own internally-stated Goals?

The TSPs list the following as their second and fourth highest priority goals (Section 2. A. Purpose):

"2. Mitigate the cumulative transportation impact resulting from new development within the *TSP* Area..."

"4. Require that new Development mitigate transportation impacts;"

The City cannot "mitigate the cumulative transportation impact resulting from new development" projects or "require that new development mitigate their transportation impacts", when the City: 23

- Excuses from traffic study and mitigation requirements, projects which, according to ITE's unrealistic low trip rates, are estimated to generate 42 or fewer Peak Hour trips.

  Below are a few examples of the Trip Rates the TSP's allow developers to use, the number of units that will be exempted, and the number of real trips those projects will probably generate.

Land Use Category	Peak Hour Trip Rate Allowed	Number of Units Exempted under the 42-trip Exemption	Probably Real Trips Generated per Unit	Probably Real Trips Generated each commute period.
Single Family Homes	1	42	2	82
Apartments	0.58	72	1.5	108
High Rise Apartments	0.35	120	1.25	150
"Senior Housing" (age 55 and up).	0.25	168	1	168

- Allows development projects to add traffic up to 1% to 4% of a road's or intersection's physical capacity, depending on current conditions, without paying a dime toward the mitigation of those impacts because the City chooses to call them "Less than Significant Impact". 24

- Allows development projects to add traffic equal up to 1% of intersections' physical capacity when demand at those intersections already exceeds their physical capacity limit. 25

- Exempts certain development project types from paying any Transportation Impact Assessment (TIA) Fees, such as the 35 most frequently built types of development projects exempted by the predecessors TSPs did for the benefit of Playa Capital. 26

The above exclusions, allowances and exemption are offered to developers by the Los Angeles Department of Transportation and can be found in their Traffic Study Policies and Procedures which are referenced twenty times in each TSP, therefore included in the TSPs by reference and therefore open to Public Comment. 27

Will Residential Neighborhoods be protected from traffic diverting from BRT-impacted arterials?

The TSPs claim the following as one of their goals,

"11. Promote neighborhood protection programs to minimize intrusion of commuter traffic through residential neighborhoods,

and contain the following paragraphs describing the "neighborhood protection plans".

Section 4. Definitions

Neighborhood Traffic Management (NTM) Program: A plan to prevent, control, or minimize Project traffic from traveling through nearby residential areas or local streets and mitigate transportation impacts on local streets.

and

Appendix A: List of Transportation Projects

Neighborhood Protection Program

The objective of this Program is to discourage through-traffic from using local streets and to encourage, instead, use of the arterial street system. The Program will establish measures to make the primary arterial routes more attractive and local routes less attractive for through traffic, and establish measures designed to facilitate vehicular and pedestrian egress from local streets in the adjacent neighborhoods onto the primary arterial street and highways system.

At the January 21, 2016 Public Hearing on these plan, I asked City Planning what the term "local streets" meant in the phrase "discourage through-traffic from using local streets". City Planning employees initially told me it meant "streets local to the neighborhood".

However, after relating my three-year ordeal trying to get LADOT to use the $150,000 I secured from Playa Capital to install effective cut-through traffic volume control measures on the residential Collector streets which LADOT had allowed Playa Capital to use in their Traffic Model as planned routes to absorb Playa Vista traffic that would not fit on the arterial streets and having LADOT refuse to do so claiming that the City only promises to protect residential streets it designates as "Local" verses "Collector" streets, LA Department of City Planning employees agreed to clarify that the term "local streets" in the TSPs to mean "streets local to the neighborhood, which includes both streets designated as Local streets and streets designated as Collector streets." 28

Street designated as "Local" streets are those inside residential neighborhoods which do not connect to the arterials at all or at least do not connect to arterials at signal-controlled intersections, thereby making them impossible or at least improbable routes for cut-through traffic. Cut-through traffic can and does generally use only residential streets designated as "Collector" streets because these are connected to arterials at signal-controlled intersections, thereby providing cut-through traffic the ability to turn Left or Right or continue across the arterial and cut-through the next neighborhood.

The term "local streets" also needs to be clarified as meaning, "streets local to the neighborhood, including both Local and Collector streets" to fix the inconsistency problem that exists both internally and between the proposed TSPs and other City plans.

State Law requires a City's General and related plans to have both internal consistency and cross-plan consistency. Claiming that the City will,

"Promote neighborhood protection programs to minimize intrusion of commuter traffic through residential neighborhoods"

when disallows cut-through volume control measures such as partial or complete street closures, "Do Not Enter" signs, Turn restrictions, chokers, diagonal diverters, etc. on the residential Collector streets is inconsistent both internally and with General Plan policies such as,

LA General Plan; Transportation Element Policy 4.1

" Seek to eliminate or minimize the intrusion of traffic generated by new regional or local development into residential neighborhoods while preserving an adequate collector street system."

LA General Plan; Transportation Element Policy 4.2

"Incorporate traffic management measures to control traffic speeds and volumes on local and collector streets within low density residential neighborhoods to assure safe and orderly traffic flow."

and Community Plan policies which say that the City is to,

"Discourage non-residential traffic flow on residential streets and encourage community involvement in determining neighborhood traffic controls."

I can see two ways to solve this inconsistency problem.

1. Add the following to the ***Definitions*** section of the TSPs:

local streets: This term means streets local to the neighborhood, including both streets designated as Local streets and those designated as Collector streets.

2. Change the wording of the following sections as shown below.

In **Section 4. Definitions,** *Change last paragraph on bottom of page 6 from,*

Neighborhood Traffic Management (NTM) Program: A plan to prevent, control, or minimize Project traffic from traveling through nearby residential areas or local streets and mitigate transportation impacts on local streets.

to:

Neighborhood Traffic Management (NTM) Program: A plan to prevent, control, or minimize Project traffic from traveling through nearby residential ~~areas, or local streets. and mitigate transportation impacts~~ on collector and local streets.

And in **Appendix A: List of Transportation Projects; Neighborhood Protection Program, c***hange*

The objective of this Program is to discourage through-traffic from using local streets and to encourage, instead, use of the arterial street system. The Program will establish measures to make the primary arterial routes more attractive and local routes less attractive for through traffic, and establish measures designed to facilitate vehicular and pedestrian egress from local streets in the adjacent neighborhoods onto the primary arterial street and highways system.

to,

The objective of this Program is to discourage through-traffic from using collector and local streets and to encourage, instead, use of the arterial ~~system~~ streets. Street designations and uses are those defined in the Complete Streets Design Guide. The Program will establish measures to make the primary arterial routes more attractive and collector and local routes less attractive for through traffic~~, and establish measures designed to facilitate vehicular and pedestrian egress from local streets in the adjacent neighborhoods onto the~~ primary ~~arterial streets and highways system~~. Neighborhood Protection Programs may include, but are not limited to, any of the Traffic Volume control measures listed in the Los Angeles County Department of Public Works Neighborhood Traffic Management Program Toolbox. (http://dpw.lacounty.gov/TNL/NTMP/Page_02.cfm)

The City will never realize the desired shift from private-vehicles to transit until residential Collector streets are blocked to cut-through commuter traffic.

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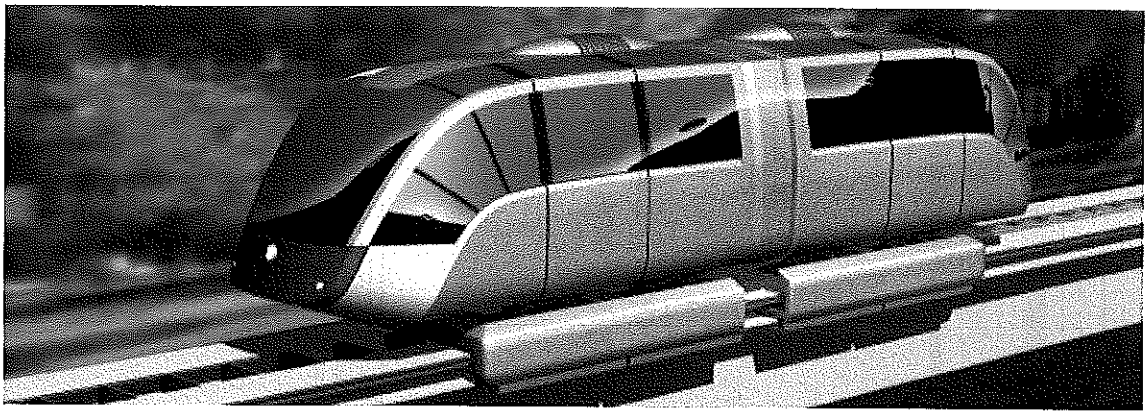
Suggested Solutions

The TIA Fee proposed is based on cramming Bus Rapid Transit lanes into existing arterial space, which the EIR says will increase traffic congestion, increasing residential neighborhood cut-through traffic and GHG emissions by private vehicles thereby yielding a net GHG reduction of less than 1%, which does not meet the State's mandated 40% reduction by 2030. Since the improvement projects upon which the TIA Fee is based do not meet the required goals, new projects must be selected and the TIA Fee re-determined based on the new, goal-meeting infrastructure improvements. 29

The only possible way I see to meet all of the goals that the TSPs are trying to meet is to add capacity to the arterial system to make up for the capacity the City has given away to developers free of charge over the last two decades through the predecessor TSPs and LADOT's Traffic Study Policies and Procedures.

This additional capacity will have to be added either above or below grade as there is no room left to build or expand roads. It will be much cheaper to elevate light-weight, solar-power-assisted monorails, or even passive, maglev monorails, such as the Urban Maglev developed by General Atomic in San Diego, than to add capacity by subways at $450M a mile or elevated light-rail at $227M a mile. General Atomics' Urban Maglev uses Halbach-arrayed permanent magnets rather than electromagnets to levitate its carriages or trains, so no massive electric grid is needed as with "Light Rail". And with zero friction once in motion, propulsion energy must be extremely low and GHG emissions almost nil.



30

"Light Rail" really isn't light and therefore it is not as energy efficient as monorails which run all elevated and therefore do not need to be built to heavy rail car crash standards because there can be nothing on their guide-beam with which they can crash.

Design a World's-Best transportation system using something like Urban Maglev's running over the Right-Turn/Parking lanes of existing arterials between the Light Rail lines as feeders. Urban Maglev's can even dip down to near street-level for boarding as illustrated on the next page. This eliminates the time and cost of building elevated stations with elevators for ADA people. Then set the TIA Fee to cover the cost of accommodating on this World's Best system each additional commuter to be added by a development project. No exclusions. No exemptions. No "Less than Significant Impacts".

Credits In-Lieu of the Transportation Impact Assessment (TIA) Fee are too liberal.

Affordable Housing In-Lieu TIA Fee Credit

Developers should not be given *double* credits for building "affordable housing". In fact, I see no need to pay them at all. If the City is as out of balance with regard to affordable housing as you say, then just limit all development for the next 5 to 10 year to affordable housing. Developers will build them because they will want to stay in business. And they will build the affordable housing in low-traffic areas that need revitalization because that's where the land is cheap. 31

Transit Oriented Development In Lieu TIA Fee Credit

The TSP's provision for granting a 5% TIA Fee Credit for projects built with ½ mile of a transit line essentially grants this credit to all development projects built anywhere in the City. Drop this Credit. 32

PC12 Bill Pope 3/7/2016

Response to Comment PC12-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project.

Conditions for Specific Plan Adoption

These comments state the commenter's opinions regarding the conditions under which the Proposed Project should be adopted. These comments do not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). With regards to the commenter's statements that the Proposed Project would not meet the goals and objectives set by the state, the Mayor, the City Council, and the constituents effected by the plans, in accordance with Section 15124(b) of the State CEQA Guidelines, Section 3.4 of the Draft EIR identifies the objectives sought to be achieved by the Proposed Project. With respect to the specific goals listed by the commenter, please see Responses to Comments PC12-2 through PC12-17 below. In addition, please see Master Response 1 regarding Project Objectives.

Ability of the Transportation System to Accommodate Future Demand

The comment states that the Proposed Project would not accommodate existing or future trips that would be added by 2030. As described in Section 4.6.4 of the Draft EIR, the analysis of transportation impacts was based on the City of Los Angeles Travel Demand Forecasting Model. The roadway and transit networks in the model were updated to reflect assumptions contained in the 2012-2035 SCAG RTP/SCS. The performance of the proposed transportation improvements was evaluated for conditions in 2035, based on this model.

Use of Institute of Transportation Engineers Peak Hour Trip Rates

Regarding the comments pertaining to the ITE peak hour trip rates, please see Response to Comment PC12-21 below.

Nexus Between Fees and Proposed Transportation Improvement

The commenter's statement that there is no nexus between the proposed fees and the projects required to meet the project goals is noted. A nexus study was completed in order to establish the relationship, referred to as the "nexus," between new development expected to occur and the need for new and expanded major public facilities. After establishing the nexus, the TIA fees to be levied for each land use in the areas of benefit would be calculated based on the proportionate share of the total facility use for each type of development. The Nexus Study is included in Appendix B of the Draft EIR.

Response to Comment PC12-2:

Key provisions of Assembly Bill 32 and Senate Bill 375 are described in Section 4.3.2.2 of the Draft EIR. As noted in that section, AB 32 codifies the state's GHG emission targets by requiring the state's global warming emissions to be reduced to 1990 levels by 2020. The section further notes that this is a statewide limit and does not require individual sectors or facilities to reduce emissions equally. As described in Section 4.3.2.2 of the Draft EIR, SB 375 required CARB to adopt regional GHG reduction targets from passenger vehicles. SB 375 requires metropolitan planning organizations, of which SCAG is one, to prepare Sustainable Communities Strategies as part of their RTPs to meet these GHG

emission reduction targets. The Draft EIR goes on to describe the strategies incorporated by CARB into the 2012-2035 RTP/SCS in compliance with SB 375.

The commenter claims that state goals to reduce GHG to 1990 levels by 2020 were not addressed in the Draft EIR. This is incorrect. GHG emission reduction goals, as developed for the State in AB 32 and established for the Southern California region under SB 375 in SCAG's 2012-2035 RTP/SCS, were discussed at length in Section 4.3, *Greenhouse Gas Emissions,* of the Draft EIR, with backup calculations provided in Appendix D. More specifically, one of the significant impact criteria for GHG emissions listed in Section 4.3.5 states that GHG impacts would be significant if the project would: "Impede attainment of SCAG's per capita GHG emission reduction targets as established in the 2012-2035 RTP/SCS."

As noted in Section 4.3.2.2 of the Draft EIR, AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. The Climate Change Scoping Plan for AB 32 (CARB, 2008) provides a framework for the state's strategy to reduce GHG emissions to 1990 levels by 2020. One of the key features of the Scoping Plan is to establish targets for transportation-related GHG emissions for regions throughout the state, and pursue policies and incentives to achieve those targets. Under SB 375, CARB developed regional GHG targets from passenger vehicles for 2020 and 2035. Subsequently, SCAG prepared the 2012 RTP/SCS, which addressed the reductions needed by 2020 and 2035. The reduction targets are expressed in terms of daily GHG emissions per capita (pounds/day/person). A comparison of the 2012 RTP/SCS target for 2035, and future GHG emissions with and without the Proposed Project, was provided in Table 4.3-3 of the Draft EIR. As shown in the table, per capita CO_2 emissions with implementation of the Proposed Project would be lower than SCAG's target for 2035.

It should be noted that, subsequent to the completion of the Draft EIR, SCAG adopted the Final 2016 RTP/SCS in April 2016 (SCAG, 2016), which establishes a revised target for 2035 of 19.5 pounds/day/person. The per capita level in 2035 associated with the Proposed Project would be 8.6 pounds/day/person, which would be lower than this target. Therefore, the Project would continue to be less than significant if compared to the 2016 RTP/SCS target.

The regional GHG target established by SCAG, in compliance with SB 375, was identified in the Draft EIR and used as a threshold for determining the significance of project-related impacts. As noted above, project impacts would be less than that threshold in the applicable 2012-2035 RTP/SCS, and would continue to be less than the revised threshold identified in the 2016-2040 RTP/SCS. Therefore, the original determination that the impacts of the Proposed Project would not be significant relative to established per capita GHG targets for the region was, and continues to be, correct.

Response to Comment PC12-3:

The Executive Order B-30-15 (dated April 29, 2015) establishes a statewide emission reduction goal, and directs state agencies with jurisdiction over sources of GHG emissions to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 GHG reduction targets. This Executive Order was discussed in Section 4.3.2.2 of the Draft EIR. SCAG developed per capita GHG emission reduction targets relative to 2005 that exceeded the reduction targets currently required by CARB for 2035 and 2040 (CARB, 2014c). (SCAG noted in its recently approved 2016 RTP/SCS that it anticipates updated and more stringent regional emission reduction targets). Please see Response to Comment PC12-2 regarding the comparison of the Future with Project per capita GHG emissions with targets developed by SCAG for the region. Note that Future with Project per capita emissions,

8.6 pounds/day/person, are more than 50 percent lower than the 2035 target in either the 2012-2035 RTP/SCS or 2016-2040 RTP/SCS. Moreover, Future with Project per capita emissions would be lower than Future without Project emissions. Please see Master Response 2 regarding the role of improved emission factors in calculating future emissions.

Response to Comment PC12-4:

The Complete Streets legislation (AB 1358) was passed in 2008 to require California cities and counties to include complete streets policies as part of their circulation element in their general plans in order to incorporate a balanced, multimodal transportation network that meets the needs of all users of streets (i.e., motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation). As noted by the commenter, the Draft EIR addressed increased transportation choices associated with the California Complete Streets Act. Specifically, Impact 4.4-2 in Section 4.4*, Land Use and Planning,* of the Draft EIR evaluates the consistency of the Proposed Project relative to the California Complete Streets Act. The Proposed Project would be consistent with the goals of the California Complete Streets Act because it supports the newly adopted Mobility Element of the General Plan and would improve various forms of transportation, including transit, bicycling, and walking in the project area.

Response to Comment PC12-5:

The commenter states that a goal of the California Complete Streets Act is economic revitalization. The Act requires cities and counties to include complete streets policies as part of their general plans so that roadways are designed to safely accommodate all users, including bicyclists, pedestrians, transit riders, children, older people, and disabled people, as well as motorists. Economic revitalization is not a stated goal of the Act. Impact 4.4-2 in Section 4.4*, Land Use and Planning,* of the Draft EIR evaluates the consistency of the Proposed Project relative to the California Complete Streets Act. The Proposed Project would be consistent with the goals of the California Complete Streets Act because it supports the newly adopted Mobility Element of the General Plan. Section 4.4*, Land Use and Planning,* and Section 4.6, *Transportation,* of the Draft EIR evaluate secondary effects of loss of street parking on land use and traffic congestion. These effects were found to be less than significant. Please also see Response to Comment PC5-20 regarding potential impacts to businesses from the removal of street parking.

Response to Comment PC12-6:

The commenter states that a goal of the California Complete Streets Act is improved return on infrastructure investment. The Act requires cities and counties to include complete streets policies as part of their general plans so that roadways are designed to safely accommodate all users, including bicyclists, pedestrians, transit riders, children, older people, and disabled people, as well as motorists. Return on infrastructure investment is not a stated goal of the Act. Please see Response to Comment PC12-5 regarding the Project's consistency with the Complete Streets Act.

Response to Comment PC12-7:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the project will not meet the Complete Streets Act goal of Livable Communities due to cut-through traffic impacts. Mitigation measure (MM-T-2) states that LADOT shall implement the Neighborhood Protection Program on

impacted residential streets based on an analysis of project-specific impacts conducted according to LADOT Traffic Study Policies and Procedures. The implementation of the mitigation measure would reduce the level of impact but cannot be guaranteed to reduce residential traffic volumes below the City's current thresholds, and regional growth is expected to increase overall activity levels and travel demand in the study area. Therefore, the impact was identified as significant and unavoidable. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC12-8:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the project will meet the Complete Streets Act goal of improving safety for all users by increasing congestion. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC12-9:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the project will meet the Complete Streets Act goal of providing protected bike paths. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC12-10:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the project may meet the Complete Streets Act goal of more walking and biking to improve public health. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC12-11:

The California Complete Streets Act (Assembly Bill 1358, Chapter 657, Statutes 2008) states, "In order to fulfill the commitment to reduce greenhouse gas emissions, make the most efficient use of urban land and transportation infrastructure, and improve public health by encouraging physical activity, transportation planners must find innovative ways to *reduce vehicle miles traveled (VMT) and to shift from short trips in the automobile to biking, walking and use of public transit*" (emphasis added). As demonstrated in Table 4.6-24 of the Draft EIR, while VMT in the project area would be higher than existing conditions with implementation of the Proposed Project, Future with Project VMT would be less than Future without Project conditions. Therefore, the Proposed Project would meet the intent of the California Complete Streets Act by reducing VMT and encouraging alternative travel modes.

The commenter states that the Proposed Project would not be consistent with the goals of the Complete Streets Act with regards to GHG reduction and improved air quality. This is incorrect. As

shown in Table 4.1-15 of the Draft EIR, Future with Project criteria pollutant emissions would be lower than Existing Conditions for all pollutants by the following amounts: carbon monoxide (-73%), volatile organic compounds (-69%), nitrogen oxides (-57%), coarse particulate matter (i.e., PM10, -3%), fine particulate matter (i.e., PM2.5, -20%), and sulfur dioxide (-35%). Table 4.1-15 also shows that Future with Project emissions would be lower than Future without Project emissions for carbon monoxide (-2%), volatile organic compounds (-2%), PM10 (-3%), PM2.5 (-3%), and sulfur dioxide (-2%). Only the reduction in emissions of nitrogen oxides under the Future with Project scenario would be less than the reduction in the Future with Project and Future without Project scenario (by 2.5%). This lesser reduction associated with Future with Project emissions would be due to the difference in speed profiles between the two scenarios, as noted in Section 4.1.6. In summary, criteria pollutant emissions with implementation of the Proposed Project would be lower than Existing Conditions for all pollutants, and lower than Future without Project conditions for CO, VOC, PM10, PM2.5, and SO_2. The increase of NOx emissions above Future without Project conditions is not considered to be a significant impact, because impacts are determined by comparing Future with Project conditions to existing conditions for CEQA purposes. Since project-related emissions would be lower than existing conditions for all pollutants, impacts related to operational vehicle emissions in the study area would be less than significant. Therefore, the Proposed Project would be consistent with the goals of the Complete Streets Act pertaining to air quality.

Similarly, as shown in Table 4.3-2 of the Draft EIR, the Future with Project GHG emissions would be lower than Existing Condition emissions (-34%), and lower than Future without Project emissions (-1%). Therefore, GHG emissions associated with the Proposed Project would be less than significant, and would be better than GHG emissions under Existing Conditions or Future without Project conditions.

Response to Comment PC12-12:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the project will not meet the State's goal of reducing VMT by 15 percent based on SB 743. The reduction of 2.1% stated in the comment is not related to the Proposed Project, but is from the City's 2035 Mobility Plan EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC12-13:

The commenter's opinion that BRT is not consistent with world-class transportation infrastructure is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter states that the Great Streets Directive includes a goal of building a world-class transportation infrastructure. The Mayor's Executive Directive 1, known as the Great Streets Initiative, does not include a goal of building a world-class transportation infrastructure. Rather, the goals of the Great Street Initiative are increased economic activity, improved access and mobility, enhanced neighborhood character, greater community engagement, improved environmental resilience, and safer and more secure communities (City of Los Angeles, 2013). Impact 4.4-2 in Section 4.4, *Land Use and Planning,* of the Draft EIR evaluated the consistency of the Proposed Project relative to the City of Los Angeles Great Streets Initiative and concluded that the Proposed Project would be consistent with the Initiative.

Response to Comment PC12-14:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the project will not meet the Mayor's goal of Vision Zero due to the implementation of light rail transit. Light rail transit is not proposed as part of the Specific Plan updates. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC12-15:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the project will not meet the City Council's goal of directing LADOT and City Planning to develop solutions and long-term plans to respond to congestion and mobility challenges. Please see Master Response 1 regarding Project Objectives. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of impacts related to the circulation system. Impacts 4.6-2 and 4.6-4 describe the level of service impacts anticipated with the Proposed Project. It should be noted that the percent of roadway segments operating at LOS E or F under existing with project conditions in the commenter's table are inaccurate. As summarized in Appendix G, *Analysis of Project Impacts Compared to Existing Conditions,* of the Draft EIR, a quantitative analysis was not conducted for existing plus project conditions. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC12-16:

The commenter quotes the Draft EIR's summary of the public scoping comments. The commenter highlighted (through use of underlining and/or bold text) the words "traffic," "circulation," "capacity," and "congestion" in the quote from the Draft EIR. No further comment is provided. Traffic, circulation, capacity and congestion are addressed in Section 4.6, *Transportation,* of the Draft EIR of the Draft EIR. It should be noted that the project objectives do not include an objective relating to reducing congestion or to increasing roadway capacity. Please see Master Response 1 for a discussion of the objectives of the Proposed Project.

Response to Comment PC12-17:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the Draft EIR provides no evidence that people-movement capacity will be increased as a result of the Proposed Project. The commenter has provided no evidence or rationale to support his argument as to the EIR's deficiency on this basis. An analysis of people-movement capacity is not required under CEQA. Chapter 3, *Project Description,* of the Draft EIR explains the components of the Westside Mobility Plan that are included in the CEQA process. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC12-18

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the Proposed Project will have significant and unavoidable impacts to circulation, neighborhood intrusion, congestion management plan and emergency access. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of these impact areas. Specifically, Impact 4.6-2 provides a discussion on the operation of the vehicular circulation system, Impact 4.6-3 provides a discussion of neighborhood traffic intrusion, Impact 4.6-4 provides a discussion of the congestion management plan, and Impact 4.6-5 provides a discussion on the need for a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. Impacts 4.6-2, 4.6-3 and 4.6-4 are acknowledged as being significant and unavoidable. However, Impact 4.6-5 is less than significant. On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future by SCAG. This growth will occur with or without the implementation of the Proposed Project. The background growth influences the transportation analysis by accounting for the increased activity levels under Future with Project conditions, although those increases would occur with or without the project. Consequently, when comparing future traffic operations to Existing conditions, peak period congestion would continue to increase as a result of background growth. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC12-19:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the Proposed Project is adding center-running Bus Rapid Transit lanes on Sepulveda and Lincoln Boulevards. Bus Rapid Transit is included as part of the Project Lists. As described in the introduction to Chapter 4, *Environmental Impacts*, of the Draft EIR, the improvements and programs on the specific plan project lists would not be entitled or constructed as part of this project. The improvements are conceptual at this time, and no detailed designs or implementation plans have been developed for the individual components.

The commenter states that a people-movement capacity analysis was not performed as part of the project and proceeds to provide their own analysis for person capacity with the implementation of BRT. It is unclear as to how the commenter developed the assumptions applied in their person capacity analysis, including but not limited to the capacity value of 843 people in a through lane when traveling by car, 832 people in 57-passenger buses in a dedicated lane, and 467 people if the City does not purchase a sufficient number of new buses to serve the BRT lanes. Please see Response to Comment PC12-18 regarding the transportation impact analysis conducted as part of the Draft EIR. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC12-20:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the through lanes along BRT corridors will need to accommodate both through vehicles and turning vehicles, and that the capacity

will be reduced. It is unclear as to how the commenter determined that right-turning vehicles would block through traffic 56% of the time or that left-turning vehicles would block through traffic 90% of the time. Various intersection-specific factors contribute to intersection traffic flow such as pedestrian volume, number of vehicles making right and left turns, and amount of oncoming traffic affecting left turns. It is also unclear as to how the commenter determined the reduction in people-movement capacity based on various headway options.

As discussed in Section 4.6, *Transportation,* of the Draft EIR, traffic impacts were analyzed with the implementation of transit projects in the project list updates. Table 4.6-12 of the Draft EIR summarizes the transit projects analyzed as part of the project list updates and notes the projects that would require a dedicated transit lane. The reduction in vehicular capacity is reflected in the impact analysis contained in Section 4.6. Specifically, Impact 4.6-2 provides a discussion on the operation of the vehicular circulation system, and Impact 4.6-2 is acknowledged as being significant and unavoidable. Please see Response to Comment PC12-18 regarding the transportation impact analysis conducted as part of the Draft EIR. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC12-21:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that ITE rates are not a measure of how many commuters want to travel but rather a measure of how many commuters can travel during the peak travel hours. The commenter claims that the ITE rates are based on observations in cities with better mass transit options, in cities where two incomes are not required to purchase a new home, and include historical counts when two career families were not the norm. First, the commenter is incorrect that ITE rates are based on constrained trip generation estimates and focused in areas with better mass transit options and single household incomes. ITE rates are collected throughout the Country, and often focus on suburban areas where trip generation data is more readily available. Second, the use of ITE data is related to the proposed TIA fees and not related to the EIR Impact Analysis contained in Section 4.6, *Transportation,* of the Draft EIR. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC12-22:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that trip rates for use in the TIA fees should be based on the number of average LA incomes required to qualify for a loan to purchase an average residential unit and that this data could be obtained by banks. The commenter would like the TIA fees to be based on the cost of the system to accommodate the true demand for travel. As stated in the Nexus Study (included in Appendix B of the Draft EIR), the TIA fees can only cover a portion of the overall costs of the improvements proposed in the updated project lists. This comment is related to the proposed TIA fees and not related to the Draft EIR. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC12-23:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the Specific Plans do not meet their own goals. Please see Master Response 1 for a discussion on the Project Objectives. The proposed TIA fee helps to mitigate the cumulative impacts of development and is proposed at an amount that meets the State's mitigation fee nexus requirements (AB 1600).The commenter also refers to the current LADOT trip threshold for requiring a traffic impact study for a new development project. The City's requirements for traffic studies are part of LADOT's Traffic Study Policies and Procedures and are not part of the Proposed Project. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC12-24:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the impact thresholds for traffic impact studies. The City's requirements for traffic studies are part of LADOT's Traffic Study Policies and Procedures and are not part of the Proposed Project. The commenter is also incorrect that new development does not contribute payment towards transportation project if they don't exceed LADOT's impact thresholds. All development projects providing a net increase in land uses pay a TIA fee within the Specific Plan areas, regardless of their size, except for land uses that are exempt from the TIA fees. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC12-25:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the impact thresholds for traffic impact studies. The City's requirements for traffic studies are part of LADOT's Traffic Study Policies and Procedures and are not part of the Proposed Project. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC12-26:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the land uses exempt from paying the TIA fee and is not related to the Draft EIR. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC12-27:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the requirements of traffic impact studies in Los Angeles. The City's requirements for traffic studies are part of LADOT's Traffic Study Policies and Procedures and are not part of the Proposed Project. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC12-28:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the Neighborhood Traffic Management (NTM) Program described as part of the Proposed Project lists. The commenter would like the definition of the NTM program to be expanded to include both collector and local residential streets, and would like collector streets to be eligible for traffic calming measures instead of restricting calming measures to local streets. The types of traffic calming measures suggested in the comment, such as Do Not Enter signs and turn movement restrictions, are typically not appropriate for collector streets. Collector streets typically serve multiple local residential roadways and restricting access to/from the collector street could impact the adjacent residents that rely on the collector roadways to access their neighborhood. This comment is related to the project list updates. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC12-29:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the Proposed Project will increase traffic congestion, neighborhood traffic intrusion, and GHG emissions. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of transportation impacts. Specifically, Impact 4.6-2 provides a discussion on the operation of the vehicular circulation system, Impact 4.6-3 provides a discussion of neighborhood traffic intrusion and Impact 4.6-4 provides a discussion of the congestion management plan. Impacts 4.6-2, 4.6-3 and 4.6-4 are acknowledged as being significant and unavoidable. On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future by SCAG. This growth will occur with or without the implementation of the Proposed Project. The background growth influences the transportation analysis by accounting for the increased activity levels under Future with Project conditions, although those increases would occur with or without the project. Consequently, when comparing future traffic operations to Existing conditions, peak period congestion would continue to increase as a result of background growth. Please see Master Response 2 related to GHG emissions. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC12-30:

The comment addresses the goals of the Specific Plan updates and proposes an alternative that would involve an elevated monorail. Responses to these two topics are provided below.

Goals of the Specific Plan Updates

The commenter's opinion that the only way to meet the goals of the Specific Plan updates is to add capacity to the arterial system is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The objectives of the Proposed Project are listed in Section 3.4 of the Draft EIR. A discussion of project objectives is also provided in Master Response 1. As noted in the master response, the project objectives do not include increasing the vehicle capacity of the City's roadway network.

Elevated Monorail

The commenter's suggestion that the Proposed Project include an elevated solar-assisted or maglev monorail is noted. The commenter notes that a monorail would be less expensive than a subway or elevated light rail; the Proposed Project does not include any subway or elevated light rail. It is expected that an elevated monorail would be significantly more expensive than the transportation improvements that are included in the Proposed Project lists, and more expensive than LRT, which was studied as an alternative in the Draft EIR. The Draft EIR concluded that the costs associated with LRT on Sepulveda Boulevard and Lincoln Boulevard would be so high as to hinder the TIA fee program's ability to partially fund and build out a comprehensive transportation multimodal network on the Westside. For this reason, the LRT alternative was not carried forward for analysis in the Draft EIR. Similar conclusions would apply to an elevated monorail. Moreover, it is expected that an elevated monorail would have greater impacts than the Proposed Project in terms of construction-related air quality, noise, and traffic. An elevated monorail would also have the potential to physically divide the community and could have significant aesthetic impacts. Please see Response to Comment PC7-12 as to why additional alternatives do not need to be evaluated in the EIR.

Response to Comment PC12-31:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the Affordable Housing Credit; this credit is described in the Specific Plans. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC12-32:

The content of this comment is similar to, and raises the same issues as those raised in, comment PC9-24; please refer to Response to Comment PC9-24.

February 7, 2016

City of Los Angeles, Department of City Planning
Ms. Conni Pallini-Tipton, AICP, Senior City Planner
200 North Spring Street, Room 667
Los Angeles, CA 90012
213-978-1179 213-978-1477 fax

RE: ENV-2014-1458-EIR General Comments

There is gap between the Coastal TCSP and West Los Angeles TIMP on Venice Blvd. from approximately Albright in Los Angeles under the 405 freeway to Sepulveda in Los Angeles which is in Culver City jurisdiction. Any transit or streetscape improvements should coordinate with Culver City to make a smooth transition between TCSP and TIMP. Specifically the traffic signals at Sawtelle and at Sepulveda are not synchronized to provide reasonable traffic flow on Venice Blvd. especially at peak hours. This creates idling pollution for several hours per day and would impact any Rapid Bus improvements on Venice Blvd. as well . Cal Trans would also probably have to be involved as Venice Blvd. is largely still a state highway. 1

Under list of Projects:

Transit -

The Venice Boulevard Rapid Bus Enhancements should not remove or close any existing parking lanes or vehicular traffic lanes. Flow of vehicles should be enhanced and not restricted. 2

Bicycle and Pedestrian -

The Venice Blvd. Streetscape Improvements should extend from Lincoln Blvd. in Venice all the way to the Culver City border at Albright and not stop the improvements at Inglewood Blvd. There is no reason to ignore the balance of Venice Blvd. in Mar Vista which extends from approximately Beethoven to Albright. 3

Any Venice Blvd. Cycle track should not remove any existing parking or vehicular traffic lanes 4

Sincerely,

Christopher McKinnon
11837 North Park Avenue
Los Angeles, CA 90066

310-572-7929
chrispm@afewgoodideas.com

PC13 Christopher McKinnon 2/7/2016

Response to Comment PC13-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see MM-T-3 in Section 4.6, *Transportation,* of the Draft EIR that describes coordination with other agencies on transportation improvements and funding. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC13-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that travel and/or parking lanes not be removed on Venice Boulevard as part of the rapid bus enhancements. As described in Section 4.6, *Transportation,* of the Draft EIR, the rapid improvements on Venice Boulevard would operate in mixed-flow travel lanes with vehicles. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC13-3:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the improvements included in the Proposed Project list updates. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC13-4:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that travel and/or parking lanes not be removed on Venice Boulevard as part of the cycle track. Section 4.6, *Transportation,* of the Draft EIR presents the transportation impact analysis for the improvements contained in the project list updates. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Letter PC14

Croft Wellwood

3426 Inglewood Blvd.
Los Angeles, CA 90066

Cell: 310 968 0310
Office: 310 306 6979
malibuca@gte.net

March 4, 2016

Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N. Spring Street, Room 667
Los Angeles, CA 90012

Dear, Ms. Conni Pallini-Tipton,

I was very disappointed to learn that the City in its Westside Mobility Plan proposes to make one of the two through lanes on Lincoln and/or Sepulveda, in each direction, exclusive to buses.

This will have a severe impact on north/south traffic, and will ultimately spill over to residential streets such as mine on Inglewood. Inglewood has already been severely impacted by the excessive development in Playa Vista, and at times I can't even get out of my own driveway. 1

Lincoln and Sepulveda were designed as main arteries, and are lined with businesses that need traffic, whereas the residential streets do not need nor or designed for through traffic.

The proposal is a complete affront to the citizens of LA. Giving buses exclusive use of our public streets is not fair representation, and further will impact the quality of life for its residents. 2

You are my voice in Los Angeles. Please speak for me, and quash this outrageous idea.

Sincerely,

Croft Wellwood

Cc:
Mike Bonin, Los Angeles City Council Member, Council District 11
City Hall Office
200 N. Spring Street, #475
Los Angeles, CA 90012

LA-DEPT-PLANNING-160304.DOC

PC14 Croft Wellwood 3/4/2016

Response to Comment PC14-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of impacts associated with transportation, in particular Impact 4.6-3 which addresses impacts related to the diversion of traffic. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC14-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

-----Original Message-----
From: fehrandp@box748.bluehost.com [mailto:fehrandp@box748.bluehost.com]
Sent: Sunday, January 31, 2016 2:05 PM
To: WestsideMobilityPlan
Subject: [Westside Mobility Plan] Please moderate: "Additional Resources"

A new comment on the post "Additional Resources" is waiting for your approval
http://www.westsidemobilityplan.com/additional-resources/

Author: Jarret King (IP: 76.94.213.185, cpe-76-94-213-185.socal.res.rr.com)
Email: jarretking1@gmail.com
URL:
Comment:
I really think that a grade separated rail option for Sepulveda Boulevard would better serve future Westside and Valley residents. I think this because not only will Westside residents be able to get to LAX faster, residents commuting from the valley can have enhanced options regarding where they can work because a grade separated train can get them to their destination faster than bus rapid transit can. 1

Approve it: http://www.westsidemobilityplan.com/wp-admin/comment.php?action=approve&c=6555
Trash it: http://www.westsidemobilityplan.com/wp-admin/comment.php?action=trash&c=6555
Spam it: http://www.westsidemobilityplan.com/wp-admin/comment.php?action=spam&c=6555
Currently 41 comments are waiting for approval. Please visit the moderation panel:
http://www.westsidemobilityplan.com/wp-admin/edit-comments.php?comment_status=moderated

PC15 Jarret King 1/31/2016

Response to Comment PC15-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Chapter 6, *Alternatives,* of the Draft EIR regarding consideration of an alternative that would provide light rail transit on Sepulveda Boulevard and Lincoln Boulevard.

-----Original Message-----
From: fehrandp@box748.bluehost.com [mailto:fehrandp@box748.bluehost.com]
Sent: Tuesday, February 02, 2016 8:51 PM
To: WestsideMobilityPlan
Subject: [Westside Mobility Plan] Please moderate: "Additional Resources"

A new comment on the post "Additional Resources" is waiting for your approval
http://www.westsidemobilityplan.com/additional-resources/

Author: lorene ross (IP: 71.105.68.20, pool-71-105-68-20.lsanca.dsl-w.verizon.net)
Email: lorene.ross1@verizon.net
URL:
Comment:
I noticed that a parking study hasn't been done since October 2010. Well a lot has changed since then. Abbot Kinney Blvd. has a lot more traffic since then and has created problems on the streets around Abbot Kinney Blvd.
I live on shell avenue and have difficulty finding parking near my house. I called to find out how we could get permit parking but the person who takes care of that was not available and does not return phone calls. We have neighbors argueing about parking spaces. One neighbor scratched the whole side of my car. My pursuit of happiness has been taken away. Putting parking meters in the parking lots on Electric Ave. made it worse. People want free parking. The traffic light on Palms and Abbot Kinney is rediculous. Only the car coming down the street can see the light but the pedestrian cannot see that the light is on. We have 3 walk streets that also use shell avenue to park. Traffic is heavy and it's dangerous to stop and park. We also have alternate side of the street parking for street cleaning. The City is making good money on parking fines. I need an answer soon. 1

Approve it: http://www.westsidemobilityplan.com/wp-admin/comment.php?action=approve&c=6557
Trash it: http://www.westsidemobilityplan.com/wp-admin/comment.php?action=trash&c=6557
Spam it: http://www.westsidemobilityplan.com/wp-admin/comment.php?action=spam&c=6557
Currently 42 comments are waiting for approval. Please visit the moderation panel:
http://www.westsidemobilityplan.com/wp-admin/edit-comments.php?comment_status=moderated

PC16 Lorene Ross 2/2/2016

Response to Comment PC16-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding existing parking constraints in the Venice area and is referring to a parking study that was conducted as part of the Westside Mobility Plan but is not part of the environmental analysis in the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

From: Paula Barondess [mailto:paulabarondess@yahoo.com]
Sent: Tuesday, January 26, 2016 3:47 PM
To: WestsideMobilityPlan
Subject:

Absolutely NO.

This is not Manhattan or a small town in Conn.

This is Los Angeles were 1% of us MAY live close enough to bike or walk to work.

My commute currently is 30 to 60 min by car for a 13 mile drive.

If I were FORCED onto public transport it would take over 2 hours with transfers, etc.

And your assertion about slowing down traffic for safety ... Just how much road rage will be put up with before you admit you were wrong.

If you look at your own statistics you know the the use of public transport has decreased.

Please, do nothing that would impact this city more adversely than you already have.

Wonder how many of you take the bus daily .... TO WORK ...

Probably, only when your drivers calls in sick. But then you can just pull from the pool. So, I guess that means NEVER.

Exactly who appointed this group? Next election their job may be at risk.

1

PC17 Paula Barondess 1/26/2016

Response to Comment PC17-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that walking, biking and public transit are not viable forms of transportation in the study area and that the use of public transit has decreased. Please see Response to Comment PC5-12 regarding transit ridership trends. The comment does not identify any specific issues with the EIR analysis or conclusions and provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

From: Rick Teplitz [mailto:rteplitz@earthlink.net]
Sent: Friday, January 08, 2016 10:42 AM
To: WestsideMobilityPlan
Subject: Westside Mobility

Good day,

There is nothing about density that is good for this city or this planet. Creating excuses for developers to come in and get second opportunities to build larger structures on sites that were previous low density spaces is part of an ongoing disaster for the city of Los Angeles. Have you driven down Jefferson near Playa Vista? The new structures there block out the sun and the sky. A low profile light industrial area is being converted to tens of thousands of residents and hundreds of thousands of car trips, regardless of mitigation efforts. Non-egalitarian as well.

Transit is used as an excuse for more development. It is a slow-moving disaster and give-away of commons to developers. How do you think they make their profits? It isn't magic.

Aided and abetted by engineers who solve everything with engineering instead of thinking of other solutions. Maybe just don't build more. If you don't build it, if you put hard caps on water use (which we have far too little of) with projections that use real numbers, maybe we simply don't allow the city's population to grow. Enough is enough.

FYI, I am a second generation native and my children are 3rd. I care about this city more than most of the carpet baggers working for it. And on squeezing what they can from it.

1

Best Regards,

Rick Teplitz

310-704-3361 mobile

310-568-9173 fax

rteplitz@earthlink.net

PC18 Rick Teplitz 1/8/2016

Response to Comment PC18-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Letter PC19

CTC/WLA TIMP SPECIFIC PLANS UPDATE

Community Public Meeting

Tuesday, January 21, 2016, 6:00 p.m. - 8:30 p.m.
Venice High school
13000 Venice Boulevard, Los Angeles, CA 90056

Comment Sheet

Name: J. Ross
Affiliation: resident
Address: 2307 Amherst LA 90064
Phone/Cell: 310 - 979 - 9255
Email: Ross - Jay @ hotmail.com

Thank you for your interest in the Westside Mobility Plan. We welcome your comments and suggestions:

No fee exemption for residential or any land use is good → thanks! 1

Can you figure out a way for fee to also fund operations (bus drivers, bus repairs, etc.)? 2

Capital improvement should avoid car-centric road widening / repair / etc. Focus on mass transit (and I am a car driver, fyi.) 3

Look at San Francisco's ATG fee system. Fee is per car trip (on grounds that every single trip is an impact). That structure encourages developers to reduce car trips + save $$ by paying a lower fee. 4

Please submit this comment card in the box at the registration table. You may also mail your comment to: 5851 Pine Avenue, #A, Chino Hills, CA 91709 or submit your comment via fax at 909-628-5804 or email at westside2@fehrandpeers.com

over →

Letter PC19

CTC/WLA TIMP SPECIFIC PLANS UPDATE

Community Public Meeting

Tuesday, January 21, 2016, 6:00 p.m. - 8:30 p.m.
Venice High school
13000 Venice Boulevard, Los Angeles, CA 90056

Comment Sheet

Every other city charges fee on Residential. Developers can simply negotiate a lower land price to counter the higher fees. 5

Please submit this comment card in the box at the registration table. You may also mail your comment to: 5851 Pine Avenue, #A, Chino Hills, CA 91709 or submit your comment via fax at 909-628-5804 or email at westside2@fehrandpeers.com

PC19 J. Ross 1/21/2016

Response to Comment PC19-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is pleased with the Proposed Project's fee assessment of residential uses. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC19-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that the fees help to fund transit operation and maintenance, which is not allowed under AB 1600. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC19-3:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. As indicated in Chapter 2, *Executive Summary,* of the Draft EIR, a primary project objective is the provision of transportation options and accommodations for multiple modes of travel (i.e., transit, bicycle, pedestrian, and vehicle).

Response to Comment PC19-4:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is recommending that the City of San Francisco's fee system be reviewed because it encourages developers to reduce car trips. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC19-5:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is supportive of the Proposed Project's fee assessment of residential uses. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Letter PC20

CTC/WLA TIMP SPECIFIC PLANS UPDATE

Community Public Meeting

Tuesday, January 21, 2016, 6:00 p.m. - 8:30 p.m.
Venice High school
13000 Venice Boulevard, Los Angeles, CA 90056

Comment Sheet

Name: Jonathan Weiss
Affiliation: Stakeholder
Address: 10576 Troon Ave, LA 90064
Phone/Cell: 310 558-0484
Email: ~~jw@jwolojw~~ JW@LOJW.com

Thank you for your interest in the Westside Mobility Plan. We welcome your comments and suggestions:

I'd like to see a ferry across the Marina del Rey channel connecting the Marvin Braude bike path. 1

Please submit this comment card in the box at the registration table. You may also mail your comment to: 5851 Pine Avenue, #A, Chino Hills, CA 91709 or submit your comment via fax at 909-628-5804 or email at westside2@fehrandpeers.com

PC20 Jonathan Weiss 1/21/2016

Response to Comment PC20-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the improvements included in the Proposed Project list updates. It should be noted that the fees can only fund transportation improvements within the Specific Plan boundaries, which does not include Marina del Rey. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Letter PC21

CTC/WLA TIMP SPECIFIC PLANS UPDATE

Community Public Meeting

Tuesday, January 21, 2016, 6:00 p.m. - 8:30 p.m.
Venice High school
13000 Venice Boulevard, Los Angeles, CA 90056

Comment Sheet

Name: Thomas Hunt
Affiliation: LAUSD / Div. of Adult & Career Education
Address: Venice High School Campus 13000 Venice Blvd., Los Angeles, CA 90066
Phone/Cell: (310) 577-4235
Email: thomas.hunt@lausd.net

Thank you for your interest in the Westside Mobility Plan. We welcome your comments and suggestions:

Adult ed. students served by LAUSD largely depend on public transportation to get to and from schools. Sometimes the school district moves our school sites to accommodate K-12 priorities. Transportation then becomes an issue if relocation sites do not have convenient public bus service. Therefore, your plan should be dynamic enough to provide feeder links to our school sites or paratransit connections to MTA trunk routes. An example is the possible displacement of Emerson Adult Learning Center in Westchester - 2 blocks from MTA's Manchester bus - to Wright Middle School - 8 blocks from the bus. 1

Please submit this comment card in the box at the registration table. You may also mail your comment to: 5851 Pine Avenue, #A, Chino Hills, CA 91709 or submit your comment via fax at 909-628-5804 or email at westside2@fehrandpeers.com

PC21	**Thomas Hunt**	**LAUSD Division of Adult & Career Education Venice High School Campus**	**1/21/2016**

Response to Comment PC21-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the improvements included in the Proposed Project list updates. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Letter PC22

CTC/WLA TIMP SPECIFIC PLANS UPDATE

Community Public Meeting

Tuesday, January 21, 2016, 6:00 p.m. - 8:30 p.m.
Venice High school
13000 Venice Boulevard, Los Angeles, CA 90056

Comment Sheet

Name: J. Ross
Affiliation: Affordable housing developer
Address:
Phone/Cell: 310-979-9255
Email: Ross_Jay@hotmail.com

Thank you for your interest in the Westside Mobility Plan. We welcome your comments and suggestions:

The fee exemption for affordable housing is good. Affordable housing cannot be financed without fee waivers + incentives like this. The high cost of land is countered with good policy like this. 1

It is a fair compromise — cheaper housing for poor people in exchange for lower development costs.

Please submit this comment card in the box at the registration table. You may also mail your comment to: 5851 Pine Avenue, #A, Chino Hills, CA 91709 or submit your comment via fax at 909-628-5804 or email at westside2@fehrandpeers.com

PC22 J. Ross Affordable Housing Developer 1/21/2016

Response to Comment PC22-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Letter PC23

CTC/WLA TIMP SPECIFIC PLANS UPDATE

Community Public Meeting

Tuesday, January 21, 2016, 6:00 p.m. - 8:30 p.m.
Venice High school
13000 Venice Boulevard, Los Angeles, CA 90056

Comment Sheet

Name: Melissa.
Affiliation:
Address:
Phone/Cell:
Email:

Thank you for your interest in the Westside Mobility Plan. We welcome your comments and suggestions:

Please keep in mind when designing / moving forward with this mobility plan, the pedestrian experience at street level. If you want to encourage more transit riders or people to get out of their cars, make taking public transportation easy, comfortable and accessible. 1

Creating or converting bus stops into information hubs, public spaces or social hubs would greatly help. Let's help keep our city connected.

Please submit this comment card in the box at the registration table. You may also mail your comment to: 5851 Pine Avenue, #A, Chino Hills, CA 91709 or submit your comment via fax at 909-628-5804 or email at westside2@fehrandpeers.com

PC23 Melissa 1/21/2016

Response to Comment PC23-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the improvements included in the Proposed Project list updates. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Letter PC24

CTC/WLA TIMP SPECIFIC PLANS UPDATE

Community Public Meeting

Tuesday, January 21, 2016, 6:00 p.m. - 8:30 p.m.
Venice High school
13000 Venice Boulevard, Los Angeles, CA 90056

Comment Sheet

Name: ELIZABETH POLLOCK
Affiliation: DEL REY RESIDENTS ASSOCIATION
Address: 11923 BLUFF ST. CULVER CITY CA 90230
Phone/Cell: (310) 699 5165
Email: eliz.pollock@gmail.com

Thank you for your interest in the Westside Mobility Plan. We welcome your comments and suggestions:

I WOULD NOT EXEMPT AFFORDABLE UNITS FROM THE TIA's. AS IT IS, BUILDERS GET DENSITY BONUSES FOR BUILDING AFFORDABLE UNITS, BUT THE CITY's HOUSING DEPARTMENT HAS NO RECORD OF WHERE THESE AFFORDABLE UNITS ARE LOCATED AND DOES NOT MONITOR WHETHER THE UNITS REALLY GO TO PEOPLE WITH LOW INCOMES. 1

IN DEL REY, WE IDENTIFIED 10 PROJECTS THAT GOT BONUSES WITHIN ONE YEAR. NONE WAS REGISTERED WITH THE HOUSING DEPARTMENT.

Please submit this comment card in the box at the registration table. You may also mail your comment to: 5851 Pine Avenue, #A, Chino Hills, CA 91709 or submit your comment via fax at 909-628-5804 or email at westside2@fehrandpeers.com

PC24 Elizabeth Pollock Del Rey Residents Association 1/21/2016

Response to Comment PC24-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the affordable housing exemption and the Housing Department's affordable housing monitoring practices. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Letter PC25

CTC/WLA TIMP SPECIFIC PLANS UPDATE

Community Public Meeting

CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)

Tuesday, February 2, 2016, 6:00 p.m. - 8:30 p.m.

Henry Medina West LA Parking Enforcement Facility

11214 Exposition Blvd, Los Angeles, CA 90064

2/2/16

Comment Sheet

Name: David Feuer

Affiliation:

Address:

Phone/Cell:

Email: david8feuer@gmail.com

Thank you for your interest in the Westside Mobility Plan. We welcome your comments and suggestions:

RE: Pedestrian mobility - A brief story. Recently, near my home in Palms, Venice Blvd was dug up for underground work in the center of the roadway. The median approaching ~~there~~ the intersection of Venice & Motor was completely removed. When the median was rebuilt it was significantly narrower than it had been ~~before~~ previously. The new portion of median along side the left turn pocket is now so narrow that persons crossing Venice (walking) cannot stand safly on it, a walker, such as my mother uses would not fit on the median, as such she will never be able to cross Venice Blvd, for the remainder of her life! 1

The 'moral' of this story: We need co-ordination/requirements that all agency's follow for upgrades to modern mobility/access standards. In this example we lost an inadequate but usable pedestrian island, we could have had a proper pedestrian refuge for this difficult & large crossing.

Please submit this comment card in the box at the registration table prior to February 7th. You may also mail your comment to: 5851 Pine Avenue, #A, Chino Hills, CA 91709 or submit your comment via fax at 909-628-5804 or email at westside2@fehrandpeers.com

PC25 David Feuer 1/21/2016

Response to Comment PC25-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SHARON COMMINS 1-21-2016 COMMENT (ON FILE)

Letter PC26

MOBILITY PLAN COMMENTS JAN 2016

1. The Framework General Plan reference, pg. 4.4-28, land uses, should also note the land use policy goals related to conserving single family neighborhoods as part of the Plan's comprehensive strategy for long term growth.
    a. **GENERAL PLAN FRAMEWORK ELEMENT, Chapter 3 - Land Use GOALS, OBJECTIVES AND POLICIES *ISSUE TWO: USES, DENSITY, AND CHARACTER* SINGLE-FAMILY RESIDENTIAL:** ***Overview:*** The Framework Element recognizes the importance of existing single-family residential neighborhoods and the need to conserve them. Traditionally, they have formed the fabric that has distinguished the City from other urban areas. Even with substantial growth, the single-family dwelling is still considered to bea major objective of most income and ethnic groups. These areas also afford added opportunities to take advantage of the variety of lifestyles such as water oriented, rural/agricultural and equestrian-keeping special use neighborhoods. 1

CASE # ENV 2014 1458-EIR

PC26 Sharon Commins 1/21/2016

Response to Comment PC26-1:

This comment is noted and will be forwarded to the decision-makers for their consideration. The Proposed Project does not propose the construction of any improvements outside of existing public right-of-ways that would affect single family neighborhoods. Moreover, the project would not alter any zoning or General Plan land use designations or otherwise allow for development of non-residential land uses in single family neighborhoods. Therefore, the policy noted by the commenter does not pertain to the Proposed Project, and no revision to the Draft EIR is required.

FIX THE CITY

1557 Westwood Blvd. #235, LA, CA 90024

Laura@FixTheCity.org

Testimony re. WLA TIMP and Westside Mobility Plan DEIR

Medina Center, February 2, 2016

Laura Lake, Ph.D.

Traffic congestion is the number one concern of the general public. The City must decide if it is going to reduce congestion or increase it through multi-modal proposals that reduce capacity, harm the regional economy, air quality, and 1

1. SO-CALLED MITIGATION MEASURES MAY BE IMPACTFUL. Increasing congestion by converting travel lanes does not reduce air pollution or greenhouse gases. There is an assumption that things will be so bad, people will switch to mass transit. That hasn't worked out too well for our region, and the polls show that it is a huge public concern. Giving people options doesn't mean that they will avail themselves of those options. See Footnote 1. 2
2. COMMUNITY PLANS PREDICATE CHANGES IN DENSITY WITH ADEQUATE INFRASTRUCTURE. WLA, Westwood, etc., and the General Plan Framework Section 3.3.2 Monitoring, require that development be stopped if there isn't adequate public service (police, fire, water, sewage, etc.). How does the TIMP impact the need for adequate infrastructure? 3
3. IMPROVE MOBILITY, DON'T CREATE MORE CONGESTION. The Westside Mobility Plan must address increases in congestion due to multi-modal proposals that eliminate travel lanes or eliminate street parking without replacing it off-street. Street widening should be avoided. 4
4. ANALYZE FREE BUS AND TRAIN PASSES FOR STUDENTS. What impact would this have on congestion? Compare the benefits of this plan with the alternative of capital improvements. 5
5. TIMP FEES SHOULD NOT BE PERMITTED TO BE USED AS OVERHEAD FOR LADOT OR PLANNING. Rather, these fees need to be reinvested in transportation subsidies, landscaping, etc. 6
6. PARKING DISTRICT INVESTMENTS. Parking meters and city garage revenue should remain in parking districts similar to Old Town Pasadena, and used to provide both increased off-street parking and landscaping and maintenance, not merely a cash transfer to the General Fund. 7

7. BEFORE STREET PARKING IS REMOVED IN BUSINESS DISTRICTS, BUILD OFF-STREET MUNICIPAL PARKING and use the proceeds to maintain and landscape the area, as well as to subsidize mass transit. 8
8. FLAWED LAND-USE PLANNING ASSUMPTIONS THAT INCREASED DENSITY WILL RESULT IN REDUCED CONGESTION, OR THAT PARKING REDUCTIONS WILL LEAD TO MORE MASS TRANSIT RIDERSHIP. Density bonuses have not reduced congestion, nor have they provided affordable housing. 9
9. USE OF TIMP FEES for fare subsidies would be far more effective than using it to widen streets or create bike lanes. An emphasis on operating cost subsidies rather than capital improvements, is necessary. 10
10. MULTI-MODAL TRANSIT OPTIONS ARE NOT THE SAME AS CONGESTION SOLUTIONS. 11
11. THE GOAL OF THE WESTSIDE MOBILITY PLAN IS TO REDUCE CONGESTION. But there is no nexus between the improvements using the TIMP fees and mobility. The proposals contained in this DEIR will result in increased congestion, based on the current projects proposed in the General Plan Framework Mobility Element. 12
    a. Converting travel lanes to bicycle paths or lanes will increase congestion and dramatically increase neighborhood intrusion traffic. 13
    b. Removing parking for local businesses will create urban decay, which was not studied in the EIR 14
    c. This plan, like the citywide Mobility Plan, confuses access with decreasing congestion. Making multi-modal options available does not mean that they will be used. This is speculative and not based on substantial evidence. 15
    d. Assuming that VMT reduction will result in lower greenhouse gas emissions is based on a built-in assumption that travelers will switch to mass transit and thus car use will decline. This is not supported by the latest report in the LA Times that reported that mass transit ridership has declined by 10%.[1]. 16
    e. A more accurate measure of reduced greenhouse gases and air pollution is Vehicle Hours Traveled (VHT).
    f. LOS is a more accurate predictor of air pollution, congestion, and greenhouse gases than VMT.
    g. The DEIR needs to include an urban decay analysis of the costs of delay to the economy of the city. There are significant adverse impacts from increasing congestion in the name of going multi-modal that are not analyzed in the EIR. 17

[1] Laura J. Nelson and Dan Weikel, "Transit ridership declining despite massive investment, more rail lines," *Los Angeles Times*, January 27, 2016.

12. LEVEL OF SIGNIFICANCE FOR TRAFFIC ANALYSIS. The worse the traffic volume, the greater the amount of traffic deemed to be insignificant (less than !% or 2% increase). Please analyze a method of measuring impacts that does not let massive projects be approved because the area is already at gridlock. 18
13. ANALYSIS OF CUT-THROUGH TRAFFIC **PRIOR** TO PROJECT IMPLEMENTATION should be part of the traffic analysis for all multi-modal projects. 19
14. STUDY THE IMPACT ON BRT OF SHARING BUS LANES WITH BICYCLES. 20

Sincerely,

Laura Lake, Ph.D.

FIX THE CITY

PC27 Laura Lake FIX THE CITY 2/2/2016

Response to Comment PC27-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is asserting an opinion or speculation and provides no substantial evidence to support these statements. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC27-2:

Please see Response to Comment PC5-12 regarding public transit ridership trends. The comment that that converting travel lanes would not reduce air pollution or greenhouse gases is noted. Air quality impacts of the Proposed Project were addressed in Section 4.1, *Air Quality,* of the Draft EIR and GHG emissions were addressed in Section 4.3, *Greenhouse Gas Emissions*. As shown in the Draft EIR, impacts of the Proposed Project related to air quality and GHG emissions would be less than significant. Please see Response to Comment PC12-11 for a discussion of air pollutant and GHG emissions under the Proposed Project as compared to Existing Conditions and Future without Project conditions. As discussed in that response, emissions of all criteria pollutant and GHG emissions would be lower under the Proposed Project than under Existing Conditions. In additions, emissions of all pollutants except NOx would be lower under the Future with Project condition than the Future without Project condition.

Response to Comment PC27-3:

The Proposed Project is not a land use planning document. No new development would occur, or be entitled, in association with the Proposed Project. Therefore, the Proposed Project would not result in impacts to public services or public utilities as a result of new development. The Notice of Preparation prepared for the Proposed Project, included in Appendix A of the Draft EIR, analyzes the impacts of the Proposed Project on Public Services (Section 2.14) and Utilities and Service Systems (Section 2.17). The analysis of Public Services concludes that the Proposed Project would not cause adverse physical impacts to public services such that construction of new or physical alteration of existing facilities would be required in order to maintain acceptable service ratios, emergency response times, or other performance objectives for any public services. The analysis of Utilities and Service Systems concludes that the Proposed Project would not affect water or wastewater infrastructure, including treatment capacity, existing or the demand for new utility lines, energy resources, or solid waste facilities.

Response to Comment PC27-4:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the impacts of multi-modal improvements on congestion must be analyzed and that street widening should be avoided. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of these impact areas. Specifically, Impact 4.6-2 provides a discussion on the operation of the vehicular circulation system, and is acknowledged as being significant and unavoidable. On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future by SCAG. This growth will occur with or without the implementation of the Proposed

Project. The background growth influences the transportation analysis by accounting for the increased activity levels under Future with Project conditions, although those increases would occur with or without the project. Consequently, when comparing future traffic operations to Existing conditions, peak period congestion would continue to increase as a result of background growth.

Street widening is not part of the Proposed Project. As described in Chapter 6, *Alternatives,* of the Draft EIR, the addition of new right-of-way to the City's street network was determined to be inconsistent with the Mobility Plan 2035 goals and policies regarding the use of existing right-of-way and the reduction of VMT. Furthermore, as discussed under Alternative 1 in Chapter 6 of the Draft EIR, roadway capacity improvements would require acquisition of right-of-way, including the demolition of buildings on parcels adjacent to existing roadways. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC27-5:

The commenter suggests that the Draft EIR consider free bus and train passes for students in order to reduce congestion. As noted in Master Response 1, reducing congestion is not an objective of the Proposed Project. Rather, one of the primary objectives of the Proposed Project is to provide transportation options for multiple modes of travel (i.e., transit, bicycle, pedestrian, and vehicle). The commenter's suggestion would not increase options for multiple modes of travel. Please also see Response to Comment PC7-12 as to why additional alternatives do not need to be evaluated in the EIR.

Response to Comment PC27-6:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is asserting an opinion regarding the use of the TIA fees. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC27-7:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is asserting an opinion that City parking funds should remain within the parking district. Parking funds collected from parking meters and public lots are not part of the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC27-8:

The commenter's suggestion that off-street municipal parking be built before street parking is removed in business districts and the commenter's opinion on how parking revenue should be spent are noted. As noted in Section 4.6, *Transportation,* of the Draft EIR, parking deficits are considered to be socioeconomic effects, and need not be treated as significant impacts on the environment. However, secondary physical effects associated with removal of parking were evaluated in the Draft EIR. The Draft EIR concluded that secondary impacts of the Proposed Project related to loss of parking

would be less than significant (see Impact 4.6-8). Please see Response to Comment PC5-20 for a discussion of why the removal of parking would not be expected to result in the closure of local business or to physical impacts related to urban decay.

The Proposed Project includes a number of measures aimed at better managing the supply of parking in the study area. These are summarized on pages 4.6-68 and 4.6-69 of the Draft EIR. Please see Response to Comment PC7-12 as to why additional alternatives do not need to be evaluated in the EIR.

Response to Comment PC27-9:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that land use planning assumptions that assume that increased density will reduce congestion or that parking reductions will lead to more transit ridership are flawed. The Proposed Project does not propose any zoning or land use changes. Please see Chapter 3, *Project Description*, of the Draft EIR. In addition, no increase in transit ridership was assumed to occur due to parking reductions in the study area. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of transportation impacts. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC27-10:

The commenter states an opinion that TIA fees should be used for fare subsidies instead of for the purpose of widening streets or creating bus lanes. One of the primary objectives of the Proposed Project is to provide transportation options for multiple modes of travel (i.e., transit, bicycle, pedestrian, and vehicle). The commenter's suggestion would not increase options for multiple modes of travel. Please also see Response to Comment PC7-12 as to why additional alternatives do not need to be evaluated in the EIR.

Response to Comment PC27-11:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that multi-modal transit options are not the same as congestion solutions. Reducing congestion is not an objective of the Proposed Project. Please see Master Response 1 regarding Project Objectives. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of impacts related to the circulation system. Impacts 4.6-2 and 4.6-4 describe the level of service impacts anticipated with the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC27-12:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the goal of the Westside Mobility Plan is to reduce congestion and that there is no nexus between the transportation improvements contained in the project lists and congestion reduction. Reducing congestion is not an objective of the Proposed Project. Please see Master Response 1 regarding Project Objectives. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of impacts related to the circulation

system. Impacts 4.6-2 and 4.6-4 describe the level of service impacts anticipated with the Proposed Project. The Nexus Study documents the nexus between the transportation improvements contained in the project lists and the proposed TIA fees. The Nexus Study is included in Appendix B of the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC27-13:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the Proposed Project, and specifically bicycle facilities, will have significant and unavoidable impacts to roadways and create neighborhood intrusion. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of these impact areas. Specifically, Impact 4.6-2 provides a discussion on the operation of the vehicular circulation system, Impact 4.6-3 provides a discussion of neighborhood traffic intrusion, and Impact 4.6-4 provides a discussion of the congestion management plan. Impacts 4.6-2, 4.6-3 and 4.6-4 are acknowledged as being significant and unavoidable. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC27-14:

CEQA does not require that socio-economic concerns be addressed unless they could lead to physical environmental impacts. However, environmental documents must address the secondary physical impacts that could be triggered by an economic or social effect. The social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, but there may be secondary physical environmental impacts, such as increased traffic congestion or diverted traffic or land use impacts if the scarcity of parking could result in the displacement of businesses such that the area deteriorated leading to economic blight. Section 4.4.6 of the Draft EIR evaluated the indirect effects associated with modifications to the list of transportation improvements, including the removal of some on-street parking. The evaluation concluded that, while parking could be more challenging for patrons of some individual business, the change in parking availability would not cause a disruption of land uses that would constitute a significant land use impact. Section 4.6.6 of the Draft EIR also evaluated secondary impacts to transportation, including removal of parking. The analysis concluded that removal of parking due to the Proposed Project would not result in impacts to traffic congestion based on the off-setting benefits from other components of the Proposed Project. Please see Response to Comment PC5-20 regarding the potential for the loss of street parking to result in the loss of local businesses, resulting in urban decay. As discussed in that response, removal of street parking would not be expected to result in the closure of local businesses and would not lead to urban decay.

Response to Comment PC27-15:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the Proposed Project and MP 2035 confuse access with decreasing congestion. This is not true. Improvements in accessibility due to multi-modal improvements are analyzed separately from congestion impacts. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of transportation impacts. In addition,

please refer to Master Response 1 regarding Project Objectives. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC27-16:

As shown in Section 4.3, *Greenhouse Gas Emissions,* of the Draft EIR, GHG emissions associated with the Proposed Project would be lower than existing conditions (see Table 4.3-2). This conclusion is not based on a reduction in VMT, as VMT under the Proposed Project would be higher than under existing conditions. Nevertheless, the Draft EIR does conclude that GHG emissions under Future with Project conditions would be lower than emissions under Future without Project conditions due to lower VMT associated with the Proposed Project. However, this comparison is not the basis of the significance conclusions provided in the Draft EIR. Please see Response to Comment PC5-12 regarding public transit ridership trends.

The comment that VHT and LOS are more accurate measures of reduced GHG and air pollution than VMT is noted. Please see Master Response 2 regarding how the Draft EIR analysis incorporated congestion effects into the Proposed Project emission inventories, including both criteria pollutant and GHG inventories. The comment that LOS is a more accurate predictor of congestion is noted. The analysis of impacts to the vehicular circulation system provided in the Draft EIR (Impact 4.6-2) is based on LOS.

Response to Comment PC27-17:

The costs of delay to the economy of the City is a socio-economic concern. As noted in Response to Comment PC27-14, socio-economic impacts are not considered to be significant impacts on the environment unless they could lead to physical environmental effects. Response to Comment PC27-14 also discussions the evaluation of secondary impacts to businesses resulting from implementation of the Proposed Project that was provided in the Draft EIR. Please also see Response to Comment PC5-20 regarding the potential for the Proposed Project to lead to a loss of local businesses, resulting in urban decay. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC27-18:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the impact thresholds for traffic impact studies. The City's requirements for traffic studies are part of LADOT's Traffic Study Policies and Procedures and are not part of the Proposed Project. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PC27-19:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that an analysis of cut-through traffic should be completed prior to projects being constructed. Mitigation measure (MM-T-2) states that LADOT shall implement the Neighborhood Protection Program on impacted residential streets based on an analysis of project-specific impacts conducted according to LADOT Traffic Study Policies and Procedures. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC27-20:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is requesting that the impact of buses sharing lanes with bicycle as part of BRT corridors be studied. The Proposed Project does not propose and shared bus/bicycle lanes as part of the project list updates. Shared bus/bicycle lanes are contained in the City's *Complete Streets Design Guide: Great Streets for Los Angeles* (City of Los Angeles, undated). The City's requirements for traffic studies are part of LADOT's Traffic Study Policies and Procedures and are not part of the Proposed Project. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Los Angeles/Ventura Chapter

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March 17, 2016

Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

RE: Proposed TIA Fees – Westside Mobility Plan

Dear Ms. Pallini-Tipton,

The Los Angeles/Ventura Chapter of the Building Industry Association of Southern California, (BIA-LAV) is the voice of building and development in the City of Los Angeles. We represent approximately 1,100 member companies and their respective employees involved in the building of new homes.

BIA-LAV fully understands the critical importance that traffic mitigation and reduction of greenhouse gases plays in developing strong and vibrant communities, and the role that transportation impact assessment fees play in funding such programs. BIA-LAV supports the development of a robust and inclusive transportation system to serve Angelenos. However, factors exist which were not taken into account in the staff report. When considered, it becomes apparent that Transportation Impact Assessment (TIA) fees will exacerbate the housing crisis and continue to send housing costs upward, making the achievement of housing more out of reach for the people of this City. 1

The City of Los Angeles is facing a housing crisis, with a near-term housing deficit of 148,140 housing units.[1] Understanding the importance of solving this crisis, Mayor Garcetti has put housing production at the forefront of the City's agenda, announcing a goal to add 100,000 new units in Los Angeles by 2021. Getting there would require more than 14,000 new units per year for the next seven years, putting construction at a pace that the City has rarely seen before. 2

Due to a lack of production and the inability for the market to keep up with demand, Los Angeles has also become one of the most unaffordable cities to live in the country. According to a Harvard University Housing Study, Los Angeles is the least affordable of the nation's 381 metropolitan areas[2]. A similar UCLA study found that half of all households in the region are considered "cost burdened", meaning that families spend at least 30% of

[1] City of Los Angeles Housing Element 2014-2021, page 5-4.
[2] America's Rental Housing: Evolving Markets and Needs", Joint Center for Housing Studies of Harvard University, 2013.

Letter PC28

their income on rent or mortgage payments[3]. The City Administrative Officer and Chief Legislative Analyst identified the lack of housing stock to blame for decreased affordability, and recommended that housing production must be increased to solve the homeless and affordability crisis[4].

A recent study found that the region's average housing unit built for sale or for rent carries a 40% regulatory cost component.[5] Impact fees add yet another layer of cost to produce housing, and this cost is passed on to the end user. This in turn makes the cost of housing even more expensive, or, in worst case scenarios, small-to-medium sized projects, such as those built on the Westside, will not be built or developed at all. The LADCP report does not adequately account for the devastating impact the proposed ordinance would create on the ability of the development and building community to continue to supply the City of L.A. with much-needed housing units in the face of such massive fee increases. **2**

As currently proposed, the subdivision fee for residential subdivision projects would be $9,940 in the West LA Transportation Specific Plan area (WLA), and $8,850 in the Coastal Transportation Corridor Specific Plan area; this is an 8,000-9,000% increase, respectively, from what is currently in place. The proposed fee for multi-family projects would be $3,150-$7,020 in the West LA Transportation Specific Plan area (WLA), and; $2,800-$6,250 in the Coastal Transportation Corridor Specific Plan area. This is a 3,000-7,000% increase, respectively, from current fees. Now is not the time to be increasing fees and the cost will be passed to buyers and renters, sending home prices and monthly rental prices skyrocketing even further.

Residential development fees should remain as is: exempt from TIA fees. To enact these fees is counterproductive to the economy and the production of critically needed housing, will add another layer of cost for the LA City renter or homebuyer, and will ultimately exacerbate the Los Angeles housing crisis. **3**

An alternative financial resource that may help fund the Westside Mobility Plan may be Metro's proposed ballot initiative that may go before voters this November. Under this measure, Los Angeles County would increase sales tax by a ½ cent until 2057 and extend the highly successful measure R sunset year for another 18 years; ultimately raising about $120 billion for new capital transportation projects and existing projects throughout the County. **4**

BIALAV is pleased to share our thoughts with the Los Angeles Department of City Planning. Together, we can ensure that new fees are appropriate, that residential development is not stifled, and that homes remain available for all Westside residents. As always, we remain a resource to the City on important issues that are related to the well-being of our local communities. **5**

Thank you for your time and thoughtful consideration.

Sincerely,

Tim Piasky

Tim Piasky
Chief Executive Officer

[3] "Pathways to Trouble: Homeowners and the Foreclosure Crisis in Los Angeles Ethnic Communities", UCLA Asian American Studies Center and UCLA Center for the Study of Inequality, 2014
[4] "County of Los Angeles, Comprehensive Homeless Strategy Report, 2016

PC28 Tim Piasky Building Industry Association of Southern California 3/17/2016

Response to Comment PC28-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC28-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter does not provide substantial evidence to support the claim that a fee on residential uses would exacerbate the housing crisis in Los Angeles.

To the contrary, the Draft EIR found that the proposed TIA fee updates would not foreseeably affect land uses within the study area. The potential for the proposed TIA fee updates to alter land use patterns in the Specific Plan areas was evaluated in Section 4.4, *Land Use and Planning,* of the Draft EIR and was based on an economic impact analysis that was conducted for the Proposed Project. The economic impact analysis found that, given the overall magnitude of development costs, the proposed TIA fees would be unlikely to materially affect market dynamics or deter feasible development from taking place in the CTCSP and WLA TIMP. Furthermore, the analysis found that over the long term, the proposed TIA fee increases are likely to be primary absorbed in the price of land. The analysis concluded that the feasibility of development in the project area is principally affected by factors other than TIA fees, such as tenure, location, affordable housing component, or density bonus incentives. These factors, which would not be affected by the Proposed Project, have a larger impact on the feasibility of new developments and the amount of investor return, and are critical in determining what development will occur. The economic analysis concluded that, in general, the TIA fees represent such a small portion of overall development cost that TIA fees on new development along with TIA fee credits are not expected to change the broader fundamental economics of new development. Therefore, the Proposed Project would not foreseeably affect the type of land uses, including residential uses, within the study area.

Response to Comment PC28-3:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter does not provide substantial evidence to support the claim that a fee on residential uses would "exacerbate the housing crisis in Los Angeles."

To the contrary, the Draft EIR found that the proposed TIA fee updates would not foreseeably affect land uses within the study area. The potential for the proposed TIA fee updates to alter land use patterns in the Specific Plan areas was evaluated in Section 4.4, *Land Use and Planning,* of the Draft EIR and was based on an economic impact analysis that was conducted for the Proposed Project. The economic impact analysis found that, given the overall magnitude of development costs, the proposed TIA fees would be unlikely to materially affect market dynamics or deter feasible development from taking place in the CTCSP and WLA TIMP. Furthermore, the analysis found that over the long term, the proposed TIA fee increases are likely to be primary absorbed in the price of land. The analysis

concluded that the feasibility of development in the project area is principally affected by factors other than TIA fees, such as tenure, location, affordable housing component, or density bonus incentives. These factors, which would not be affected by the Proposed Project, have a larger impact on the feasibility of new developments and the amount of investor return, and are critical in determining what development will occur. The economic analysis concluded that, in general, the TIA fees represent such a small portion of overall development cost that TIA fees on new development along with TIA fee credits are not expected to change the broader fundamental economics of new development. Therefore, the Proposed Project would not foreseeably affect the type of land uses, including residential uses, within the study area.

Furthermore, the Proposed Project includes fee exemption and credit provisions, which support the City's affordable housing production goals. Restricted Affordable Units are exempt from the TIA and fee and also eligible for a fee credit equivalent to the fee amount for two equivalent market rate dwelling units. The credit can be used to offset the total TIA fee for commercial or market-rate residential components of a mixed-use or mixed-income development. These credit and exemption opportunities can be used in concert with Density Bonus provisions. Additionally, the TIA affordable housing exemptions and credits are intended to work in concert with potential future regulations which support the development of onsite affordable housing (such as a housing linkage fee with an in-lieu housing option).

Response to Comment PC28-4:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that Metro's proposed ballot initiative on transportation funding is an alternative financial resource that could help to fund the Westside Mobility Plan. As stated in the Nexus Study, the TIA fees fund approximately 35 percent of project costs and other funding sources are needed to construct the projects contained in the project lists. The Nexus Study is included in Appendix B of the Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PC28-5:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Letter FL1

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allowed. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets. 1

The Environmental Impact Report on the above Plans confirms our findings, stating that the Plans will:

- Increase the number of arterial road segments operating at unsatisfactory levels (LOS E or F) from 21% to 24% in the AM and from 29% to 34% in the PM, and that the Plans will increase the number operating at unsatisfactory levels in the future to as much as 29% in the AM and 40% in the PM. 2
- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2035, and will in fact make a less than 1% reduction. This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent. 3
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate. 4

Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for: 5

- The noise and air pollution resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets, 6
- The health impacts and safety resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets, 6
- The City's intentional deception of claiming to protect residential neighborhoods from cut-thru traffic while disallowing cut-thru traffic volume control measures on residential Collector streets which in most cases are the only streets which cut-thru traffic can and does use, 7
- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and 8
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law. 9

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities. 10

Signed: Adam Katz

Print: Adam Katz

Address: 3232 Grand View Blvd.

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL1 Adam Katz 3/1/2016

Response to Comment FL1-1:

The content of this comment is similar to, and raises the same issues as those raised in, comment PC12-19; please refer to Response to Comment PC12-19.

Response to Comment FL1-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the Proposed Project would increase the number of arterial roadway segments operating unacceptably during the AM and PM peak periods. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of these impact areas. Specifically, Impact 4.6-2 provides a discussion on the operation of the vehicular circulation system. Impacts 4.6-2 is acknowledged as being significant and unavoidable. On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future by SCAG. This growth will occur with or without the implementation of the Proposed Project. The background growth influences the transportation analysis by accounting for the increased activity levels under Future with Project conditions, although those increases would occur with or without the project. Consequently, when comparing future traffic operations to Existing conditions, peak period congestion would continue to increase as a result of background growth. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment FL1-3:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Section 4.3, *Greenhouse Gas Emissions,* for a discussion of impacts associated with greenhouse gas emissions. No further response is required because the comment does not identify specific project alternatives that would address congestion or greenhouse gas emissions.

Response to Comment FL1-4:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is stating that the Proposed Project will have significant and unavoidable impacts to neighborhood intrusion. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of these impact areas. Specifically, Impact 4.6-3 provides a discussion of neighborhood traffic intrusion. Impact 4.6-3 is acknowledged as being significant and unavoidable. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment FL1-5:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment FL1-6:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Section 4.6, *Transportation,* for a discussion of impacts associated with transportation, in particular Impact 4.6-3 which addresses impacts related to the diversion of traffic. The commenter does not provide any specific comments on the environmental conclusions in the Draft EIR pertaining to noise, air pollution, health, or safety impacts and provides no substantial evidence that the redistribution of traffic associated with the Proposed Project would result in any impacts to these resources. Regarding potential noise impacts associated with the potential redistribution of traffic, as described in Section 4.5, *Noise and Vibration,* of the Draft EIR, changes in vehicular activity associated with the Proposed Project would not result in any significant noise impacts. Please see Section 4.1, *Air Quality,* of the Draft EIR for a discussion of impacts associated with air quality and public health risk. Specifically, Section 4.1 addresses air quality impacts associated with project-related changes in traffic. Following standard methodologies established by SCAQMD, the air quality analysis evaluated mass daily pollutant emissions in the project area. As air pollutants are not confined to specific neighborhoods or specific roadways, the potential redistribution of traffic associated with the Proposed Project would not have an air quality impact at the neighborhood level. Section 4.1 also addressed potential impacts to health associated with toxic air contaminants. The Draft EIR found that the Proposed Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts from operations would be less than significant. Please see Section 4.6 of the Draft EIR for discussion of impacts associated with public safety related to traffic. As indicated in Impact 4.6-7, implementation of the Proposed Project would not result in adverse impacts regarding safety.

Response to Comment FL1-7:

The content of this comment is similar to, and raises the same issues as those raised in, comment PC12-28; please refer to Response to Comment PC12-28.

Response to Comment FL1-8:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Within the City of Los Angeles, collector streets, secondary highways, and major highways are distinguished from one another by specific characteristics, including the number of travel lanes, presence of a median turn lane, roadway widths, and target operating speeds, among other factors. The Proposed Project would not convert any collector streets to secondary or major highways. Per Section 15131(a) of the State CEQA Guidelines, "economic or social effects of a project shall not be treated as significant effects on the environment." Although considerations other than environmental impacts have a role in the action taken by the decision-makers, the purpose of an EIR is to focus on significant environmental effects associated with a Proposed Project. Therefore, no further response is required.

Response to Comment FL1-9:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter provides no substantial evidence that the Proposed Project is inconsistent with General Plan Elements, including the Community Plans. Please see Section 4.4, *Land Use and Planning*, Impact 4.4-2 on pages 4.4-25 to 4.4-30 of the Draft EIR for a discussion of consistency with adopted plans and polices. As discussed in the Draft EIR, the proposed list of transportation improvements and fees would support implementation of the City's adopted goals. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment FL1-10:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Chapter 6, *Alternatives,* of the Draft EIR for a discussion of alternatives to the Proposed Project. The commenter does not provide any specific suggestions regarding alternatives, therefore, no further response is required.

Letter FL2

Date: March 7, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allowed. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets.

The Environmental Impact Report on the above Plans confirms our findings, stating that the Plans will:

- Increase the number of arterial road segments operating at unsatisfactory levels (LOS E or F) from 21% to 24% in the AM and from 29% to 34% in the PM, and that the Plans will increase the number operating at unsatisfactory levels in the future to as much as 29% in the AM and 40% in the PM.
- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2030, and will in fact make a less than 1% reduction. This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for: 1

- The noise and air pollution resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The health and safety impacts resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The City's intentional deception of claiming to protect residential neighborhoods from cut-thru traffic while disallowing cut-thru traffic volume control measures on residential Collector streets which in most cases are the only streets which cut-thru traffic can and does use,
- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: A Ezekiel

Print: AL EZEKIEL

Address: 3618 Inglewood Blvd, L.A., CA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

Letter FL2

ReACT
Residents Against Cut-thru Traffic
March 3, 2016

Inglewood Blvd residents' Health, Safety and Property Values are under attack.

As we told you two weeks ago, the City's Westside Mobility Plan[1] proposes to give one of the two through-lanes each direction on Sepulveda and Lincoln exclusively to buses. While the City claims there will still be two lanes left for private-vehicles, one will be what is now the Parking and Right-Turn Lane which will be blocked to thru-traffic 56% of the time by right-turning traffic waiting on pedestrians and the other lane will be blocked 90% of the time by left-turning traffic, if Left Turns are still allowed. If Left turns are not allowed, capacity will still be reduced significantly. 2

Either way, huge amounts of regional traffic will divert to Inglewood and Grand View. The cut-thru traffic that now impacts us in the evenings, WILL IMPACT US ALL DAY.

This will cause massive air and noise pollution, increase cancer and emphysema risks, increase crime, and reduce your property value by 30% as occurred on Walgrove when they did not fight for their rights. You won't be able to open your windows or be outside because of the noise and air pollution. 3

What You Need to Do Now!

To attempt to stop the City's misguided plan and to reserve your right to sue the City for damages[2], **you must file your complain and have it postmarked by Monday, March 7**. Do so by either sending your own comments or a copy of the letter on the back, via Registered Mail, to:

Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Send a copy to your City Council Member:

Mike Bonin, Los Angeles City Council Member, Council District 11. 4
City Hall Office
200 N. Spring St. #475
Los Angeles, CA 90012

To be kept up-to-date on this and other threats such as the mega developments being planned for Inglewood and Washington, and for Bundy-Centinela and Olympic, send an email to I_ReACT@verizon.net to be put on our distribution list.

Sincerely,
Bill Pope, for Residents Against Cut-thru Traffic

[1] The Westside Mobility Plan is composed of two "policy" plans, the West Los Angeles Transportation Improvement and Mitigation Specific Plan and the Coastal Transportation Corridor Specific Plan, and an Environmental Impact Report.

[2] The City is already being sued over a similar plan, the Mobility Plan 2035, which impacts the rest of the City.

FL2 Al Ezekiel 3/7/2016

Response to Comment FL2-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Response to Comment FL2-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment FL2-3:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of impacts associated with transportation, in particular Impact 4.6-3 which addresses impacts related to the diversion of traffic. Please see Response to Comment FL1-6 regarding impacts associated with noise, air pollution, and health associated with the redistribution of traffic associated with the Proposed Project. The potential for the Proposed Project to result in an increased demand for police services is addressed in Attachment 1 of the Notice of Preparation, which is provided in Appendix C of the Draft EIR. The commenter provides no substantial evidence that any aspect of the Proposed Project, including the potential redistribution of traffic, would result in an increase in crime; therefore, no further response to this comment is required. Please see Response to Comment FL1-8 regarding property values.

Response to Comment FL2-4:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Letter FL3

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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The Environmental Impact Report on the above Plans confirms our findings, stating that the Plans will:

- Increase the number of arterial road segments operating at unsatisfactory levels (LOS E or F) from 21% to 24% in the AM and from 29% to 34% in the PM, and that the Plans will increase the number operating at unsatisfactory levels in the future to as much as 29% in the AM and 40% in the PM.
- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2035, and will in fact make a less than 1% reduction, This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for: 1

- The noise and air pollution resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
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- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: E. Rendero

Print: Beth Rendero

Address: 3246 Inglewood Blvd LA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL3 Beth Rendeiro 3/1/2016

Response to Comment FL3-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL4

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Bonnie L Stout

Print: BONNIE L. STOUT

Address: 3734 GRAND VIEW BLVD.

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL4 Bonnie Stout 3/1/2016

Response to Comment FL4-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL5

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allowed. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets.

The Environmental Impact Report on the above Plans confirms our findings, stating that the Plans will:

- Increase the number of arterial road segments operating at unsatisfactory levels (LOS E or F) from 21% to 24% in the AM and from 29% to 34% in the PM, and that the Plans will increase the number operating at unsatisfactory levels in the future to as much as 29% in the AM and 40% in the PM.
- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2035, and will in fact make a less than 1% reduction. This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for: 1

- The noise and air pollution resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The health impacts and safety resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The City's intentional deception of claiming to protect residential neighborhoods from cut-thru traffic while disallowing cut-thru traffic volume control measures on residential Collector streets which in most cases are the only streets which cut-thru traffic can and does use,
- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Calvin T. Sumida

Print: Calvin T. Sumida

Address: 3575 Grandview Blvd. L.A., Ca. 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL5 Calvin T. Sumida 3/1/2016

Response to Comment FL5-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL6

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2035, and will in fact make a less than 1% reduction. This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for: 1

- The noise and air pollution resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
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- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Ching Mei Hsieh

Print: CHING MEI HSIEH

Address: 3280 Inglewood Blvd. Los Angeles. CA. 90066
TEL: 310 980 9381

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL6 Ching Mei Hsieh 3/1/2016

Response to Comment FL6-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL7

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Connie Call

Print: CONNIE CALL

Address: 3701 Grand View Blvd. LA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL7 Connie Call 3/1/2016

Response to Comment FL7-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL8

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: _____

Print: DAVID L. CRANDALL

Address: 3406 GRAND VIEW BLVD., LOS ANGELES

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL8 David L. Crandall 3/1/2016

Response to Comment FL8-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL9

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Dennis Durbrow

Print: DENNIS DURBROW

Address: 3201 GRANDVIEW BL 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL9 Dennis Dubrow 3/1/2016

Response to Comment FL9-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL10

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Donald G. Park

Print: DONALD G. PARK

Address: 3520 INGLEWOOD BLVD. IN ADDRESS SINCE 1950

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL10 Donald G. Park 3/1/2016

Response to Comment FL10-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL11

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: [signature]

Print: DONNA S. GRANDALL

Address: 3406 GRAND VIEW BLVD., LOS ANGELES

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL11 Donna S. Crandall 3/1/2016

Response to Comment FL11-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL12

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Dorothy Garven

Print: DOROTHY GARVEN

Address: 3630 INGLEWOOD BLVD - LA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL12 Dorothy Garven 3/1/2016

Response to Comment FL12-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Dr. John M. Schwarz

Print: Doctor and Mrs. John M. Schwarz

Address: 3521 Grand View Blvd
Los Angeles, CA 90066-1903

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL13 John M. Schwarz 3/1/2016

Response to Comment FL13-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL14

Date: March 1, 2016

PLEASE NOTE WE RETAIN THE LEGAL RIGHTS TO DEFEND OUR CAUSE IN COURT.

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allow. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets.

The Environmental Impact Report on the above Plans confirms our findings, stating that the Plans will:

- Increase the number of arterial road segments operating at unsatisfactory levels (LOS E or F) from 21% to 24% in the AM and from 29% to 34% in the PM, and that the Plans will increase the number operating at unsatisfactory levels in the future to as much as 29% in the AM and 40% in the PM.
- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2035, and will in fact make a less than 1% reduction, This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for: 1

- The noise and air pollution resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The health impacts and safety resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The City's intentional deception of claiming to protect residential neighborhoods from cut-thru traffic while disallowing cut-thru traffic volume control measures on residential Collector streets which in most cases are the only streets which cut-thru traffic can and does use,
- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: _____

Print: DR JAIME MILSTEIN

Address: 3555 INGLEWOOD BLVD., 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

CC: MIKE BONIN, LOS ANGELES CITY COUNCIL MEMBER, DISTRICT 11

2

FL14 Jaime Milstein 3/1/2016

Response to Comment FL14-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Response to Comment FL14-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Letter FL15

Date: March 7, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allowed. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets.

The Environmental Impact Report on the above Plans confirms our findings, stating that the Plans will:

- Increase the number of arterial road segments operating at unsatisfactory levels (LOS E or F) from 21% to 24% in the AM and from 29% to 34% in the PM, and that the Plans will increase the number operating at unsatisfactory levels in the future to as much as 29% in the AM and 40% in the PM.
- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2030, and will in fact make a less than 1% reduction. This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

1

Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for:

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- The health and safety impacts resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The City's intentional deception of claiming to protect residential neighborhoods from cut-thru traffic while disallowing cut-thru traffic volume control measures on residential Collector streets which in most cases are the only streets which cut-thru traffic can and does use,
- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: _____

Print: FRANCK ROY

Address: 3271 INGLEWOOD BLVD, LA, CA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL15 Franck Roy 3/7/2016

Response to Comment FL15-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL16

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2035, and will in fact make a less than 1% reduction. This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for: 1

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- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Gail Colver Gail Colver

Print: Gail Colver GAIL COLVER

Address: 3164 GrandView Bl, Los Angeles, CA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL16 Gail and Clint Colver 3/1/2016

Response to Comment FL16-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL17

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2035, and will in fact make a less than 1% reduction. This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
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- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: [signature]

Print: JACY & JAMES BOLDEN, HOMEOWNERS & RESIDENTS

Address: 3112 GRAND VIEW BLVD, LOS ANGELES, CA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

2

WE HAVE SEEN A MARKED INCREASE IN SPEEDING & HEAVY TRAFFIC. AS PARENTS TO A 2½ YR OLD WITH PETS WE ARE VERY CONCERNED.

FL17 Jacy and James Bolden 3/1/2016

Response to Comment FL17-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Response to Comment FL17-2:

This comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The proposed transportation improvements include improvements to a number of streets related to the Mobility Plan 2035 Neighborhood Enhanced Network (NEN). Streets on the NEN are typically enhanced with techniques to calm vehicle travel and reduce travel speeds on neighborhood roadways. As indicated on page 4.4-8 of the Draft EIR, these techniques can include, but are not limited to, bump outs, round-a-bouts, ample sidewalks and street trees. NEN streets are intended to provide a safe and convenient place to walk, roll, skate scooter, bike, and stroll. Neighborhood enhanced streets may include a range of bicycle and pedestrian treatments, as well as traffic calming elements. Please also see the discussion of Impact 4.6-7 in Section 4.6, *Transportation,* of the Draft EIR, which addresses impacts associated with transportation safety.

Letter FL18

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: [signature]

Print: J B WENNER

Address: 12227 EVERGLADE ST 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL18 JB Wenner 3/1/2016

Response to Comment FL18-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Date: March 1, 2016

MAIL

Letter FL19

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Jerome Avdesty

Print: Jerome Avdesty

Address: 3260 Inglewood Blvd LA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL19 Jerome Avoesty 3/1/2016

Response to Comment FL19-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL20

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Jessica Lee

Print: Jessica Lee

Address: 3761 Grand View Blvd

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

we are furious about this Debrogens scenario. Cannot get out of our driveway anymore. We moved from Brentwood to escape traffic & won't tolerate it here!! We mean business!

2

FL20 Jessica Lee 3/1/2016

Response to Comment FL20-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Response to Comment FL20-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of impacts associated with transportation.

Letter FL21

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: _____

Print: John Schaaff

Address: 3330 Inglewood LA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL21 John Scharff 3/1/2016

Response to Comment FL21-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL22

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Judy Estes

Print: JUDY ESTES

Address: 12317 NAVY ST. L.A. 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL22 Judy Estes 3/1/2016

Response to Comment FL22-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL23

Date: March 7, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allowed. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets.

The Environmental Impact Report on the above Plans confirms our findings, stating that the Plans will:

- Increase the number of arterial road segments operating at unsatisfactory levels (LOS E or F) from 21% to 24% in the AM and from 29% to 34% in the PM, and that the Plans will increase the number operating at unsatisfactory levels in the future to as much as 29% in the AM and 40% in the PM.
- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2030, and will in fact make a less than 1% reduction. This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for: 1

- The noise and air pollution resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The health and safety impacts resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The City's intentional deception of claiming to protect residential neighborhoods from cut-thru traffic while disallowing cut-thru traffic volume control measures on residential Collector streets which in most cases are the only streets which cut-thru traffic can and does use,
- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: _____

Print: KARLY KAZARIAN

Address: 12001 NAVY ST. LOS ANGELES, CA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

Letter FL23

ReACT
Residents Against Cut-thru Traffic
March 3, 2016

Inglewood Blvd residents' Health, Safety and Property Values are under attack.

As we told you two weeks ago, the City's Westside Mobility Plan[1] proposes to give one of the two through-lanes each direction on Sepulveda and Lincoln exclusively to buses. While the City claims there will still be two lanes left for private-vehicles, one will be what is now the Parking and Right-Turn Lane which will be blocked to thru-traffic 56% of the time by right-turning traffic waiting on pedestrians and the other lane will be blocked 90% of the time by left-turning traffic, if Left Turns are still allowed. If Left turns are not allowed, capacity will still be reduced significantly. 2

Either way, huge amounts of regional traffic will divert to Inglewood and Grand View. The cut-thru traffic that now impacts us in the evenings, WILL IMPACT US ALL DAY.

This will cause massive air and noise pollution, increase cancer and emphysema risks, increase crime, and reduce your property value by 30% as occurred on Walgrove when they did not fight for their rights. You won't be able to open your windows or be outside because of the noise and air pollution. 3

What You Need to Do Now!

To attempt to stop the City's misguided plan and to reserve your right to sue the City for damages[2], **you must file your complain and have it postmarked by Monday, March 7**. Do so by either sending your own comments or a copy of the letter on the back, via Registered Mail, to:

Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Send a copy to your City Council Member:

Mike Bonin, Los Angeles City Council Member, Council District 11. 4
City Hall Office
200 N. Spring St. #475
Los Angeles, CA 90012

To be kept up-to-date on this and other threats such as the mega developments being planned for Inglewood and Washington, and for Bundy-Centinela and Olympic, send an email to I_ReACT@verizon.net to be put on our distribution list.

Sincerely,
Bill Pope, for Residents Against Cut-thru Traffic

[1] The Westside Mobility Plan is composed of two "policy" plans, the West Los Angeles Transportation Improvement and Mitigation Specific Plan and the Coastal Transportation Corridor Specific Plan, and an Environmental Impact Report.

[2] The City is already being sued over a similar plan, the Mobility Plan 2035, which impacts the rest of the City.

FL23 Karly Kazarian 3/7/2016

Response to Comment FL23-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Response to Comment FL23-2:

The content of this comment is identical to comment FL2-2; please refer to Response to Comment FL2-2.

Response to Comment FL23-3:

The content of this comment is identical to comment FL2-3; please refer to Response to Comment FL2-3.

Response to Comment FL23-4:

The content of this comment is identical to comment FL2-4; please refer to Response to Comment FL2-4.

Letter FL24

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allowed. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets.

The Environmental Impact Report on the above Plans confirms our findings, stating that the Plans will:

- Increase the number of arterial road segments operating at unsatisfactory levels (LOS E or F) from 21% to 24% in the AM and from 29% to 34% in the PM, and that the Plans will increase the number operating at unsatisfactory levels in the future to as much as 29% in the AM and 40% in the PM.
- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2035, and will in fact make a less than 1% reduction. This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for: 1

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- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Especially Bundy/ Centinela Blvds. to ease the impact on our neighborhood. 2

Signed: [signature]

Print: Kent Alves

Address: 3228 Grand View Blvd. LA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL24 Kent Alves 3/1/2016

Response to Comment FL24-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Response to Comment FL24-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of impacts associated with transportation

Letter FL25

Date: March 7, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
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- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Lorene & Robert Goldman

Print: Lorene + Robert Goldman

Address: 12001 Dewey St. Los Angeles 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL25 **Lorene and Robert Goldman** **3/7/2016**

Response to Comment FL25-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL26

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
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We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Mario Jauregui

Print: MARIO JAUREGUI

Address: 12207 EVERGLADE ST., L.A. 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL26 Mario Jauregui 3/1/2016

Response to Comment FL26-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL27

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

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We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Marlene Alves
Print: Marlene Alves
Address: 3228 Grand View Blvd
Los Angles, CA 9066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL27 Marlene Alves 3/1/2016

Response to Comment FL27-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL28

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
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We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Marian Ample

Print: Marian Ample

Address: 3248 Grand View Blvd - LA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL28 Maureen Fimpler 3/1/2016

Response to Comment FL28-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL29

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
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We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Melanie Schaaff

Print: Melanie Schaaff

Address: 3330 Inglewood Blvd, LA, 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL29 Melanie Scharff 3/1/2016

Response to Comment FL29-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL30

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
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We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Milos Ercegovac

Print: MILOS ERCEGOVAC

Address: 3337 INGLEWOOD BL LOS ANGELES CA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL30 Milos Ercegovac 3/1/2016

Response to Comment FL30-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL31

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

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- The health impacts and safety resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The City's intentional deception of claiming to protect residential neighborhoods from cut-thru traffic while disallowing cut-thru traffic volume control measures on residential Collector streets which in most cases are the only streets which cut-thru traffic can and does use,
- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: _____

Print: NANCY GUNDLACH

Address: 12306 MARINE ST 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL31 Nancy Gundlach 3/1/2016

Response to Comment FL31-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL32

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allow. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets.

The Environmental Impact Report on the above Plans confirms our findings, stating that the Plans will: 1

- Increase the number of arterial road segments operating at unsatisfactory levels (LOS E or F) from 21% to 24% in the AM and from 29% to 34% in the PM, and that the Plans will increase the number operating at unsatisfactory levels in the future to as much as 29% in the AM and 40% in the PM.
- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2035, and will in fact make a less than 1% reduction, This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

A We cant absorb anymore traffic on Inglewood. It can take 10 minutes to go 2 blocks at peak traffic. 1 2

Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for:

- The noise and air pollution resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
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- The City's intentional deception of claiming to protect residential neighborhoods from cut-thru traffic while disallowing cut-thru traffic volume control measures on residential Collector streets which in most cases are the only streets which cut-thru traffic can and does use, 1
- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Rosanne Cunningham

Print: Rosanne Cunningham

Address: 3420 Inglewood Blvd. L.A. C.A. 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL32 Rosanne Cunningham 3/1/2016

Response to Comment FL32-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Response to Comment FL32-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of impacts associated with transportation.

Letter FL33

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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The Environmental Impact Report on the above Plans confirms our findings, stating that the Plans will:

- Increase the number of arterial road segments operating at unsatisfactory levels (LOS E or F) from 21% to 24% in the AM and from 29% to 34% in the PM, and that the Plans will increase the number operating at unsatisfactory levels in the future to as much as 29% in the AM and 40% in the PM.
- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2035, and will in fact make a less than 1% reduction, This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for: 1

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- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: _____

Print: SHOSHANA MILSTEIN

Address: 3555 INGLEWOOD BLVD.

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

CC: MIKE BONIN, L.A. COUNCIL MEMBER, DISTRICT 11

FL33 Shoshana Milstein 3/1/2016

Response to Comment FL33-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL34

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2035, and will in fact make a less than 1% reduction, This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
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- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: _____

Print: SIDNEY BASS

Address: 3272 INGLEWOOD BL, L.A. 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

Letter FL34

ReACT
Residents Against Cut-thru Traffic
March 3, 2016

Inglewood Blvd residents' Health, Safety and Property Values are under attack.

As we told you two weeks ago, the City's Westside Mobility Plan[1] proposes to give one of the two through-lanes each direction on Sepulveda and Lincoln exclusively to buses. While the City claims there will still be two lanes left for private-vehicles, one will be what is now the Parking and Right-Turn Lane which will be blocked to thru-traffic 56% of the time by right-turning traffic waiting on pedestrians and the other lane will be blocked 90% of the time by left-turning traffic, if Left Turns are still allowed. If Left turns are not allowed, capacity will still be reduced significantly. 2

Either way, huge amounts of regional traffic will divert to Inglewood and Grand View. The cut-thru traffic that now impacts us in the evenings, WILL IMPACT US ALL DAY.

This will cause massive air and noise pollution, increase cancer and emphysema risks, increase crime, and reduce your property value by 30% as occurred on Walgrove when they did not fight for their rights. You won't be able to open your windows or be outside because of the noise and air pollution. 3

What You Need to Do Now!

To attempt to stop the City's misguided plan and to reserve your right to sue the City for damages[2], **you must file your complain and have it postmarked by Monday, March 7**. Do so by either sending your own comments or a copy of the letter on the back, via Registered Mail, to:

Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Send a copy to your City Council Member:

Mike Bonin, Los Angeles City Council Member, Council District 11. 4
City Hall Office
200 N. Spring St. #475
Los Angeles, CA 90012

To be kept up-to-date on this and other threats such as the mega developments being planned for Inglewood and Washington, and for Bundy-Centinela and Olympic, send an email to I_ReACT@verizon.net to be put on our distribution list.

Sincerely,
Bill Pope, for Residents Against Cut-thru Traffic

[1] The Westside Mobility Plan is composed of two "policy" plans, the West Los Angeles Transportation Improvement and Mitigation Specific Plan and the Coastal Transportation Corridor Specific Plan, and an Environmental Impact Report.

[2] The City is already being sued over a similar plan, the Mobility Plan 2035, which impacts the rest of the City.

FL34 Sidney Bass 3/1/2016

Response to Comment FL34-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Response to Comment FL34-2:

The content of this comment is identical to comment FL2-2; please refer to Response to Comment FL2-2.

Response to Comment FL34-3:

The content of this comment is identical to comment FL2-3; please refer to Response to Comment FL2-3.

Response to Comment FL34-4:

The content of this comment is identical to comment FL2-4; please refer to Response to Comment FL2-4.

Letter FL35

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allowed. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets.

The Environmental Impact Report on the above Plans confirms our findings, stating that the Plans will:

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- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2035, and will in fact make a less than 1% reduction. This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
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- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: _____

Print: SILVA ZOTIAN

Address: 3324 GRAND VIEW BLVD, LA CA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL35 Silva Zeitian 3/1/2016

Response to Comment FL35-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL36

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Simone LeHaf

Print: Simone LeHaf

Address: 3531 Inglewood Blvd, Los Angeles, CA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL36 Simone LeHaf n/a

Response to Comment FL36-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL37

Date: March 7, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2030, and will in fact make a less than 1% reduction. This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for: 1

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- The health and safety impacts resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The City's intentional deception of claiming to protect residential neighborhoods from cut-thru traffic while disallowing cut-thru traffic volume control measures on residential Collector streets which in most cases are the only streets which cut-thru traffic can and does use,
- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Stephen Marsh

Print: Stephen Marsh

Address: 3516 Inglewood Blvd., L.A. 90066 - CA

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

Letter FL37

ReACT
Residents Against Cut-thru Traffic
March 3, 2016

Inglewood Blvd residents' Health, Safety and Property Values are under attack.

As we told you two weeks ago, the City's Westside Mobility Plan[1] proposes to give one of the two through-lanes each direction on Sepulveda and Lincoln exclusively to buses. While the City claims there will still be two lanes left for private-vehicles, one will be what is now the Parking and Right-Turn Lane which will be blocked to thru-traffic 56% of the time by right-turning traffic waiting on pedestrians and the other lane will be blocked 90% of the time by left-turning traffic, if Left Turns are still allowed. If Left turns are not allowed, capacity will still be reduced significantly. 2

Either way, huge amounts of regional traffic will divert to Inglewood and Grand View. The cut-thru traffic that now impacts us in the evenings, WILL IMPACT US ALL DAY.

This will cause massive air and noise pollution, increase cancer and emphysema risks, increase crime, and reduce your property value by 30% as occurred on Walgrove when they did not fight for their rights. You won't be able to open your windows or be outside because of the noise and air pollution. 3

What You Need to Do Now!

To attempt to stop the City's misguided plan and to reserve your right to sue the City for damages[2], **you must file your complain and have it postmarked by Monday, March 7**. Do so by either sending your own comments or a copy of the letter on the back, via Registered Mail, to:

Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Send a copy to your City Council Member:

Mike Bonin, Los Angeles City Council Member, Council District 11. 4
City Hall Office
200 N. Spring St. #475
Los Angeles, CA 90012

To be kept up-to-date on this and other threats such as the mega developments being planned for Inglewood and Washington, and for Bundy-Centinela and Olympic, send an email to I_ReACT@verizon.net to be put on our distribution list.

Sincerely,
Bill Pope, for Residents Against Cut-thru Traffic

[1] The Westside Mobility Plan is composed of two "policy" plans, the West Los Angeles Transportation Improvement and Mitigation Specific Plan and the Coastal Transportation Corridor Specific Plan, and an Environmental Impact Report.

[2] The City is already being sued over a similar plan, the Mobility Plan 2035, which impacts the rest of the City.

FL37 Stephen Marsh 3/7/2016

Response to Comment FL37-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Response to Comment FL37-2:

The content of this comment is identical to comment FL2-2; please refer to Response to Comment FL2-2.

Response to Comment FL37-3:

The content of this comment is identical to comment FL2-3; please refer to Response to Comment FL2-3.

Response to Comment FL37-4:

The content of this comment is identical to comment FL2-4; please refer to Response to Comment FL2-4.

Letter FL38

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: _____

Print: STEVEN DEPAUL

Address: 3246 Ingle Wood Blvd 90066

Please save my neighborhood of Families and Children!! 2

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL38 Steven DePaul 3/1/2016

Response to Comment FL38-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Response to Comment FL38-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Letter FL39

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allowed. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets.

The Environmental Impact Report on the above Plans confirms our findings, stating that the Plans will:

- Increase the number of arterial road segments operating at unsatisfactory levels (LOS E or F) from 21% to 24% in the AM and from 29% to 34% in the PM, and that the Plans will increase the number operating at unsatisfactory levels in the future to as much as 29% in the AM and 40% in the PM.
- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2035, and will in fact make a less than 1% reduction. This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for: 1

- The noise and air pollution resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The health impacts and safety resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The City's intentional deception of claiming to protect residential neighborhoods from cut-thru traffic while disallowing cut-thru traffic volume control measures on residential Collector streets which in most cases are the only streets which cut-thru traffic can and does use,
- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Suzanne Borenstein

Print: Suzanne Borenstein

Address: 3318 Grand View Bl., LA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL39 Suzanne Borenstein 3/1/2016

Response to Comment FL39-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL40

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

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Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for:

- The noise and air pollution resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The health impacts and safety resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
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- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: _____

Print: Teri Shoustal

Address: 12301 Navo St. LA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL40 Teri Shoustal 3/1/2016

Response to Comment FL40-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL41

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

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- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Waldo T. Holmes

Print: WALDO T. HOLMES

Address: 3221 GRAND VIEW BLVD, LA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL41 Waldo T. Holmes 3/1/2016

Response to Comment FL41-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL42

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Wayne & Mary Bohle

Print: WAYNE & MARY BOHLE

Address: 3282 GRAND View Blvd 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL42 Wayne and Mary Boehie 3/1/2016

Response to Comment FL42-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL43

Date: March 7, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Dorothy Garvon

Print: DOROTHY GARVON

Address: 3630 Inglewood Blvd – LA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL43 Dorothy Garven 3/7/2016

Response to Comment FL43-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL44

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Dorothy Anderson

Print: DOROTHY ANDERSON

Address: 3465 Inglewood Blvd., L.A. Ca 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL44 Dorothy Anderson 3/1/2016

Response to Comment FL44-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL45

Date: March 7, 2015

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: *Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.*

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allowed. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets.

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- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate. 1

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We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Aurora M. Nava-Luna

Print: Aurora M. Nava-Luna

Address: 3054 Grand View Blvd.

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL45 Aurora M. Nova-Luna 3/7/2016

Response to Comment FL45-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL46

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: _____

Print: Christine Rosenzweig

Address: 3463 Inglewood Blvd.

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL46 Christine Rosenzweig 3/1/2016

Response to Comment FL46-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL47

Date: March 7, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: _____

Print: Hideo Kondo

Address: 3316 Inglewood Blvd, Los Angeles, CA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL47 Hideo Kondo 3/7/2016

Response to Comment FL47-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL48

Date: March 7, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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- The noise and air pollution resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The health and safety impacts resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The City's intentional deception of claiming to protect residential neighborhoods from cut-thru traffic while disallowing cut-thru traffic volume control measures on residential Collector streets which in most cases are the only streets which cut-thru traffic can and does use,
- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Lawrence Toy & Margaret Toy

Print: Lawrence Toy & Margaret Toy

Address: 3701 Inglewood Blvd. L.A. 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL48 Lawrence and Margaret Toy 3/7/2016

Response to Comment FL48-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Date: March 7, 2016

Letter FL49

MARCH 04, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: *Proposed Amendments to the Coastal Transportation Corridor Specific Plan and* West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allowed. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets.

The Environmental Impact Report on the above Plans confirms our findings, stating that the Plans will:

- Increase the number of arterial road segments operating at unsatisfactory levels (LOS E or F) from 21% to 24% in the AM and from 29% to 34% in the PM, and that the Plans will increase the number operating at unsatisfactory levels in the future to as much as 29% in the AM and 40% in the PM.
- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2030, and will in fact make a less than 1% reduction. This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for: 1

- The noise and air pollution resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The health and safety impacts resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The City's intentional deception of claiming to protect residential neighborhoods from cut-thru traffic while disallowing cut-thru traffic volume control measures on residential Collector streets which in most cases are the only streets which cut-thru traffic can and does use,
- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: _____ 3/4/16

Print: RICHARD E. VAMOS

Address: 3348 GRAND VIEW BLVD., LOS ANGELES, CA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL49 Richard E. Vamos 3/7/2016

Response to Comment FL49-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL50

Date: March 7, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allowed. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets.

The Environmental Impact Report on the above Plans confirms our findings, stating that the Plans will:

- Increase the number of arterial road segments operating at unsatisfactory levels (LOS E or F) from 21% to 24% in the AM and from 29% to 34% in the PM, and that the Plans will increase the number operating at unsatisfactory levels in the future to as much as 29% in the AM and 40% in the PM.
- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2030, and will in fact make a less than 1% reduction. This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for: 1

- The noise and air pollution resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The health and safety impacts resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The City's intentional deception of claiming to protect residential neighborhoods from cut-thru traffic while disallowing cut-thru traffic volume control measures on residential Collector streets which in most cases are the only streets which cut-thru traffic can and does use,
- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: _____

Print: JONAS WOOD

Address: 3501 Inglewood blvd

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL50 Jonas Wood 3/7/2016

Response to Comment FL50-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL51

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allow. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets.

The Environmental Impact Report on the above Plans confirms our findings, stating that the Plans will:

- Increase the number of arterial road segments operating at unsatisfactory levels (LOS E or F) from 21% to 24% in the AM and from 29% to 34% in the PM, and that the Plans will increase the number operating at unsatisfactory levels in the future to as much as 29% in the AM and 40% in the PM.
- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2035, and will in fact make a less than 1% reduction, This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for: 1

- The noise and air pollution resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The health impacts and safety resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The City's intentional deception of claiming to protect residential neighborhoods from cut-thru traffic while disallowing cut-thru traffic volume control measures on residential Collector streets which in most cases are the only streets which cut-thru traffic can and does use,
- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: David Bolger - Karen Rizner

Print: David Bolger and Karen Rizner

Address: 3254 Inglewood Blvd. Los Angeles, CA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL51 David Bolger and Karen Rizner 3/1/2016

Response to Comment FL51-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL52

Date: March 7, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allowed. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets.

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- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2030, and will in fact make a less than 1% reduction. This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

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Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for:

- The noise and air pollution resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The health and safety impacts resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The City's intentional deception of claiming to protect residential neighborhoods from cut-thru traffic while disallowing cut-thru traffic volume control measures on residential Collector streets which in most cases are the only streets which cut-thru traffic can and does use,
- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Marie A. Nelson

Print: MARIE A. NELSON

Address: 3100 GRANDVIEW BL
LA CA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL52 Marie A. Nelson 3/7/2016

Response to Comment FL52-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL53

Date: March 7, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allowed. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets.

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- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2030, and will in fact make a less than 1% reduction. This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for: 1

- The noise and air pollution resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The health and safety impacts resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The City's intentional deception of claiming to protect residential neighborhoods from cut-thru traffic while disallowing cut-thru traffic volume control measures on residential Collector streets which in most cases are the only streets which cut-thru traffic can and does use,
- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Christopher J. Drohan

Print: Christopher J. Drohan

Address: 3432 Inglewood Blvd. 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL53 Christopher J. Drohan 3/7/2016

Response to Comment FL53-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Date: March 7, 2016

3-7-16

Letter FL54

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: *Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.*

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allowed. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets.

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- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2030, and will in fact make a less than 1% reduction. This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for: 1

- The noise and air pollution resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The health and safety impacts resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The City's intentional deception of claiming to protect residential neighborhoods from cut-thru traffic while disallowing cut-thru traffic volume control measures on residential Collector streets which in most cases are the only streets which cut-thru traffic can and does use,
- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Joan Murray, PhD

Print: Joan Murray, PhD

Address: 3330 GrandView Blvd, 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL54 Joan Murray 3/7/2016

Response to Comment FL54-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL55

Date: March 7, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allowed. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets.

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- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2030, and will in fact make a less than 1% reduction. This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent. N
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for: 1

- The noise and air pollution resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
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- The City's intentional deception of claiming to protect residential neighborhoods from cut-thru traffic while disallowing cut-thru traffic volume control measures on residential Collector streets which in most cases are the only streets which cut-thru traffic can and does use,
- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Tracey Porter

Print: Tracey Porter

Address: 3571 Inglewood Blvd 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL55 Tracey Porter 3/7/2016

Response to Comment FL55-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL56

Date: March 7, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allowed. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets.

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- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

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Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for:

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- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Judy Estes

Print: JUDY ESTES

Address: 12317 NAVY ST

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL56 Judy Estes 3/7/2016

Response to Comment FL56-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allowed. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets.

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Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for:

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- The health and safety impacts resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
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- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Thomas A Guem

Print: THOMAS A GUEM

Address: 3158 GRAND VIEW BLVD. 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL57 Thomas A. Guem n/a

Response to Comment FL57-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL58

Date: March 7, 2015

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: *Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.*

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allowed. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets.

The Environmental Impact Report on the above Plans confirms our findings, stating that the Plans will:

- Increase the number of arterial road segments operating at unsatisfactory levels (LOS E or F) from 21% to 24% in the AM and from 29% to 34% in the PM, and that the Plans will increase the number operating at unsatisfactory levels in the future to as much as 29% in the AM and 40% in the PM.
- Not meet the State's mandated 40% reduction in Global Warming Green House Gas emissions by 2030, and will in fact make a less than 1% reduction. This would be a gross waste of our tax money when there are other solutions to both congestions and GHG emissions on which our tax money would be better spent.
- Cause "significant and unavoidable" diversion of regional commuter traffic to residential streets of which our residential Collector street such as mine is a likely candidate.

1

Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for:

- The noise and air pollution resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The health and safety impacts resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The City's intentional deception of claiming to protect residential neighborhoods from cut-thru traffic while disallowing cut-thru traffic volume control measures on residential Collector streets which in most cases are the only streets which cut-thru traffic can and does use,
- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Yolanda Martinez

Print: Yolanda Martinez

Address: 3424 Grand View Blvd, LA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL58 Yolanda Martinez 3/7/2016

Response to Comment FL58-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL59

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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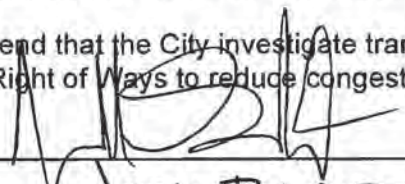
Signed: 

Print: JOSH BLEIBTREU

Address: 12228 EVERGLADE ST L.A., CA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL59 Josh Bleibtreu 3/7/2016

Response to Comment FL59-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL60

Date: March 7, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for: 1

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- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Tiffany Von Banck

Print: Tiffany Von Banck

Address: 3326 Inglewood blvd, LA, CA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

Letter FL60

ReACT
Residents Against Cut-thru Traffic
March 3, 2016

Inglewood Blvd residents' Health, Safety and Property Values are under attack.

As we told you two weeks ago, the City's Westside Mobility Plan[1] proposes to give one of the two through-lanes each direction on Sepulveda and Lincoln exclusively to buses. While the City claims there will still be two lanes left for private-vehicles, one will be what is now the Parking and Right-Turn Lane which will be blocked to thru-traffic 56% of the time by right-turning traffic waiting on pedestrians and the other lane will be blocked 90% of the time by left-turning traffic, if Left Turns are still allowed. If Left turns are not allowed, capacity will still be reduced significantly. 2

Either way, huge amounts of regional traffic will divert to Inglewood and Grand View. The cut-thru traffic that now impacts us in the evenings, WILL IMPACT US ALL DAY.

This will cause massive air and noise pollution, increase cancer and emphysema risks, increase crime, and reduce your property value by 30% as occurred on Walgrove when they did not fight for their rights. You won't be able to open your windows or be outside because of the noise and air pollution. 3

What You Need to Do Now!

To attempt to stop the City's misguided plan and to reserve your right to sue the City for damages[2], **you must file your complain and have it postmarked by Monday, March 7**. Do so by either sending your own comments or a copy of the letter on the back, via Registered Mail, to:

Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Send a copy to your City Council Member:

Mike Bonin, Los Angeles City Council Member, Council District 11. 4
City Hall Office
200 N. Spring St. #475
Los Angeles, CA 90012

To be kept up-to-date on this and other threats such as the mega developments being planned for Inglewood and Washington, and for Bundy-Centinela and Olympic, send an email to I_ReACT@verizon.net to be put on our distribution list.

Sincerely,
Bill Pope, for Residents Against Cut-thru Traffic

[1] The Westside Mobility Plan is composed of two "policy" plans, the West Los Angeles Transportation Improvement and Mitigation Specific Plan and the Coastal Transportation Corridor Specific Plan, and an Environmental Impact Report.

[2] The City is already being sued over a similar plan, the Mobility Plan 2035, which impacts the rest of the City.

FL60 Tiffany Von Banck 3/7/2016

Response to Comment FL60-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Response to Comment FL60-2:

The content of this comment is identical to comment FL2-2; please refer to Response to Comment FL2-2.

Response to Comment FL60-3:

The content of this comment is identical to comment FL2-3; please refer to Response to Comment FL2-3.

Response to Comment FL60-4:

The content of this comment is identical to comment FL2-4; please refer to Response to Comment FL2-4.

Letter FL61

Date: March 7, 2015

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: *Proposed Amendments to the Coastal Transportation Corridor Specific Plan and* West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

It is our understanding that the above Plans proposed to install a Bus Rapid Transit (BRT) system on Sepulveda and Lincoln Boulevards between Wilshire and 96th Street. The City's consultant, Fehr & Peers, either did not do a people-movement capacity study or refuses to share that information with us. Therefore, we have conducted our own study and found that the proposed BRT will reduce the people-movement capacity of Sepulveda by approximately 50% if Left-Turns off Sepulveda are still allowed. If Left-turns are disallowed, the capacity loss will be less, but traffic will still divert to residential streets.

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- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: _____

Print: WING YOUNG

Address: 3288 GRAND VIEW BLVD L.A CA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL61 Wing Young 3/7/2016

Response to Comment FL61-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL62

Date: March 7, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Elaine Miller Steven Miller

Print: Elaine Miller + Steven Miller

Address: 12300 Dewey St. LA, CA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL62 Elaine and Steven Miller 3/7/2016

Response to Comment FL62-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL63

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
LA City EIR No. ENV-2014-1458-EIR

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We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: Liz Mayo

Print: LIZ MAYO

Address: 3054 GRAND VIEW BLVD

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL63 Liz Mayo 3/1/2016

Response to Comment FL63-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL64

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

References: CPC Nos. CPC-2014-1456-SP (CTCSP) & CPC-2014-1457-SP (WLA TIMP)
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We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways, to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: _____

Print: S. KIERULFF

Address: 3418 GRAND VIEW BLVD, L.A., CA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

2016 Stephen Kierulff
3418 Grand View Blvd
Los Angeles, CA 90066

FL64 S. Kierulff 3/1/2016

Response to Comment FL64-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL65

Date: March 1, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: Proposed Amendments to the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

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We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

Signed: _____

Print: Christina Murray

Address: 3611 Grand View Blvd.

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

FL65 Christina Murray 3/1/2016

Response to Comment FL65-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Letter FL66

Date: March 7, 2016

To: Ms. Conni Pallini-Tipton, AICP, Senior Planner
Department of City Planning, City of Los Angeles
200 N Spring Street, Room 667
Los Angeles, CA 90012

Subject: *Proposed Amendments to the Coastal Transportation Corridor Specific Plan and* West Los Angeles Transportation Improvement and Mitigation Specific Plan.

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Therefore, be advised that should the above Plans be adopted as written and/or the impacts specified in the above referenced Environmental Impact Report occur, we will be forced to sue the City for: 1

- The noise and air pollution resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The health and safety impacts resulting from the non-neighborhood traffic which diverts to our residential Collector street from the BRT-impacted arterial streets,
- The City's intentional deception of claiming to protect residential neighborhoods from cut-thru traffic while disallowing cut-thru traffic volume control measures on residential Collector streets which in most cases are the only streets which cut-thru traffic can and does use,
- Damage to the marketability of our properties resulting from the City's de facto conversion of our residential Collector street into a commuter arterial highway, and
- Operating by policies other than those the City publishes to its constituents in its General and associated Plans, which is a violation of State Law.

We recommend that the City investigate transit strategies which will increase the people-movement capacities of the arterial Right of Ways to reduce congestion and GHG emissions, rather than decrease their capacities.

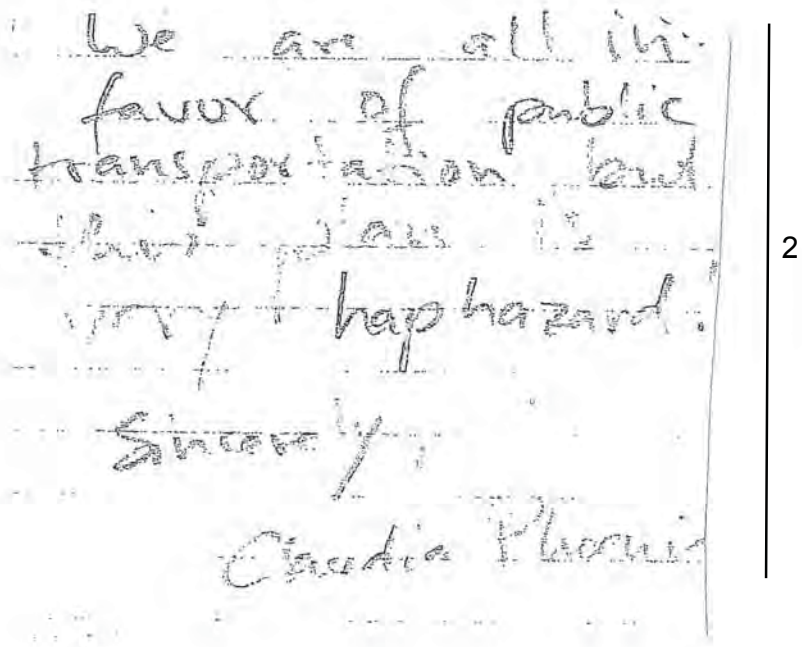
Signed: _____

Print: Claudia Phoenix

Address: 3272 Grand View Blvd. LA, CA 90066

CC: Mike Bonin, Los Angeles City Council Member, Council District 11

Letter FL66


We are all in favor of public transportation but this plan is very haphazard.

Sincerely,

Claudia Pluenneke

2

FL66 Claudia Phoenix 3/7/2016

Response to Comment FL66-1:

The content of this comment letter is identical to Comment Letter FL1; please refer to Response to Comment Letter FL1.

Response to Comment FL66-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

COASTAL TRANSPORTATION CORRIDOR SPECIFIC PLAN AND WEST LOS ANGELES TRANSPORTATION IMPROVEMENT AND MITIGATION SPECIFIC PLANS AMENDMENT PROJECT

ENV-2014-1458-EIR

Thursday, January 21, 2016
Venice High School
13000 Venice Boulevard
Los Angeles, California 90066

SHANBERG SHORTHAND REPORTERS
4771-H La Villa Marina
Marina del Rey, California 90292
(310) 306-6149

REPORTED BY:
HEATHERLYNN GONZALEZ
CSR #13646

APPEARANCES

HEARING OFFICER

Priya Mehendale
Los Angeles Department of Planning

MEMBER OF THE PUBLIC

Alex Alcantar

Thursday, January 21, 2016; Los Angeles, California

6:06 p.m.

-oOo-

MR. ALCANTAR: My name's Alex Alcantar, and I'm -- I grew up in this area. And I've seen it deteriorate to the present point of congestion. The streets are packed to their capacity at the moment; so any future projects, even if you mitigate them, I don't see how that's going to change things.

I'm a bicycle rider. I do that by choice because it's so aggravating and frustrating to drive now. So my default setting is to see if I can do a trip by bicycle. If I can't, I do it by public transportation and rail or bus. I have a car. I do own a car. But I don't use it. But I'm not normal. I'm not normal for this city. They use cars for everything. Use a car to do little tiny trips. 1

But if you can encourage people by having more bicycle paths -- not sharing the road. People are afraid to. And it's dangerous; so if you can get Class I bike paths ala Ballona Creek. If you could get more safe bike paths as an alternative to not getting in a car, I think it would behoove you as far as, you know, having an alternate mode of transportation.

So that's basically my comment. More bicycle

infrastructure.

Is that what you wanted?

HEARING OFFICER: We want to get your comment. 1

MR. ALCANTAR: It's mainly more bikes on the street. When you mix with traffic, there's always the opportunity to someone opening a door and hitting you or getting hit by a car. 2

Is that what you wanted?

HEARING OFFICER: We wanted your comment.

MR. ALCANTAR: Thank you.

(At 8:30 p.m., the proceedings were adjourned.)

C E R T I F I C A T E

I, Heatherlynn Gonzalez, a Certified Shorthand Reporter for the State of California, License Number 13646, do hereby attest that:

The preceding is a true and accurate transcription of the meeting of the organization named herein;

The meeting was taken down in shorthand and transcribed into English under my supervision and authority;

I have no interest, financial or otherwise, in any of the parties, issues, or individuals who are involved in this organization.

Attested to on this _____ day of _____, 2016.

_____

CERTIFIED SHORTHAND REPORTER

FOR THE STATE OF CALIFORNIA

PHV1 Alex Alcantar 1/21/2016

Response to Comment PHV1-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. As indicated in Chapter 2, *Executive Summary,* of the Draft EIR, a primary project objective is the provision of transportation options and accommodations for multiple modes of travel, including bicycles. Please see Chapter 3, *Project Description,* of the Draft EIR for a description of the Proposed Project, including bicycle improvements, such as cycle tracks on identified boulevards.

Response to Comment PHV1-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please see Chapter 3, *Project Description,* of the Draft EIR for a description of the Proposed Project, including bicycle projects that encourage more bike trips and improve bike safety. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of impacts associated with transportation and traffic-related safety.

COASTAL TRANSPORTATION CORRIDOR SPECIFIC PLAN AND WEST LOS ANGELES TRANSPORTATION IMPROVEMENT AND MITIGATION SPECIFIC PLANS AMENDMENT PROJECT

ENV-2014-1458-EIR

Tuesday, February 2, 2016
Henry Medina West L.A.
Parking Enforcement Facility
11214 Exposition Boulevard
Los Angeles, California 90064

SHANBERG SHORTHAND REPORTERS
4771-H La Villa Marina
Marina del Rey, California 90292
(310) 306-6149

REPORTED BY:
HEATHERLYNN GONZALEZ
CSR #13646

APPEARANCES

HEARING OFFICER

Heidi Urita-Lopez
Los Angeles Department of Planning

MEMBERS OF THE PUBLIC

Paul Howard
David Foyer
Laura Solagi
Mindy Taylor Ross

Tuesday, February 2, 2016; Los Angeles, California

6:00 p.m.

-oOo-

HEARING OFFICER: My name is Heidi Urita-Lopez. I'm the public hearing officer for tonight's public hearing.

So thank you for participating in our public process. The scheduled public hearing for this case will be noticed at a future time.

Right now, we're observing the comment period for the EIR. And we're going to be taking comments until March 7th.

So if after today you'd like to provide further comments, you're able to do so.

MR. HOWARD: Okay.

HEARING OFFICER: So if you'd like to go forward with you comments, please do so. Please state your name and address for the record.

MR. HOWARD: Yes. My name is Paul Howard, and I live at 3981 Beethoven Street, Los Angeles, California 90066 and I'm a homeowner as well as a business owner in the -- in the West Side. 1

So my, I think, statement is about the safety of pedestrians and cyclists at the Lincoln bridge and the proposed development of the Lincoln bridge. And that I

think Lincoln is a very dangerous street for both pedestrians and cyclists at that location between Lincoln -- between Ballona Creek and Westchester. You know, it's a four- to five-lane highway, essentially. And so to encourage more pedestrians and cyclists to be on Lincoln is, I think, a very dangerous thing. 1

I would propose, hopefully, that the Mobility Plan looks at alternative methods of north/south connections for -- for cyclists and for pedestrians that are more at the neighborhood street-scape level of connection rather than a major transit corridor connection. 2

And I think there are several options of pedestrian and cyclist bridges that could be utilized to connect Playa Vista to Mar Vista, Del Rey, and Marina del Rey and Venice. And so...

And I also have concerns for the safety of bicyclists and pedestrians at the -- Centinela, where the current, I guess, improved street-scape plan is happening. Because, basically, cars are trying to get on and off the 90 Freeway. And, you know, they're trying to make the light rather than looking for a cyclist or a pedestrian. And that -- because of the way that that interchange is designed, you know, people -- you have people coming on and off of the 90 Freeway at that location. 3

Letter PHWLA1

So I think more connections across Ballona Creek at the neighborhood street-scape level could be very beneficial to the overall, you know, transportation mitigation issues. And basically encourage people to get out of their cars and get on a cycle -- you know, bicycles rather than, you know, driving the corridors. 4

HEARING OFFICER: Thank you for your comments.

///

HEARING OFFICER: Tonight I'm the hearing officer. So you'll get to provide public testimony today.

So thank you for participating in our process, and if you could state your name and your address for the record. And then you can go ahead with your public comment.

Letter PHWLA2

MR. FOYER: Okay. My name is David Foyer (phonetic) and my address is 3725 Vinton Avenue. My comment is sort of a general comment --

HEARING OFFICER: Okay.

MR. FOYER: -- relating to work which I'd like to -- to see implemented overall, and this plan is as good a place as any to have it implemented among others. And it's based on observations. 1

Near my home, recently, about a year or so ago, they put in new sensors for the signals for the road in the intersection. And prior -- I ride my bicycle a lot

when I'm not driving. And prior to that, the old sensors didn't detect me when I rode my bicycle there. Which is not a problem during the daylight hours. But at night, they must operate the signals differently, and it would not ever turn green for me, and I could sit there for 20 minutes if I was that patient, which left me in the position of having to cross the street against the red light, you know, and basically have to declare "This is defective," and go.

So my comment -- so having said that, they then -- I've observed that they redid the sensor system. Saw they put new cuts in the road and the new stuff; so I know they worked on it. And the new sensors did not work either. I'm very disappointed. And I understand an old sensor that was put in 15, 20 years ago. But a new one, and with all the emphasis on mobility and access for everyone, I would hope that the installation standards would be such that they tune the systems to be able to detect cyclists and so on such as myself. 1

I even went to the extent of laying my bike on top of the sensor in the road, and it was not functioning.

So I would like to see whatever standards, training be made universal across all of -- all such installations, you know. And that be integrated into the planning process as part of the standard.

It should already be there. You shouldn't have to plan that. But evidently it's not; so I feel I need to make this comment, you know, urge that it be done. It shouldn't have to be to come out and repair it because someone's complained like me. It should just be across the board, they should just function. 1

That's the gist of my comment.

HEARING OFFICER: All right. Thank you for your comments.

MR. FOYER: Okay. Thank you.

HEARING OFFICER: I appreciate that.

///

HEARING OFFICER: My name is Heidi Urita-Lopez, and I'm with the L.A. City Planning Department. I'm today's public hearing officer; so thank you so much for participating in our public process.

So what's going to happen is that today we're providing multiple ways of -- of participants providing public comments. This is one way. We are leaving the comment period open until March 7th; so if after today you would like to provide additional comments, you may do so.

So please state your name for the record, and your address. Thank you very much.

MS. SOLAGI: Laura Solagi (phonetic) 1072 Palms, Venice 90291.

HEARING OFFICER: Okay. Please go ahead.

MS. SOLAGI: Oh, wow! You can actually do that? Oh, my God. That is such a skill. I am so impressed. Are you writing that down?

THE REPORTER: Yes. Once we're on the record, I keep writing.

MS. SOLAGI: So you're writing everything?

THE REPORTER: Uh-huh.

MS. SOLAGI: Oh, dear. Okay. Better watch myself.

Okay. Well, I'll -- I'll start and then Mindy (phonetic) can chime in, because we're -- we're kind of dealing with the same issue. And that is that we're concerned about Lincoln Boulevard in Venice, particularly from Venice Boulevard to Rose.

And we know that there's a plan to widen a bridge that's up by Jefferson. Isn't it? Which is fine. But as -- as the -- you know, and put in a dedicated bus, which we're -- we think that's a good idea. But we're concerned because we want a livable boulevard solution for Venice, particularly, it seems, very logical from --

1

MS. TAYLOR ROSS: Lincoln Boulevard.

HEARING OFFICER: So let me just ask you -- let me interrupt you for one little second.

MS. SOLAGI: Yes?

HEARING OFFICER: So you're providing comments and then you'll provide them separately. Okay?

MS. SOLAGI: Okay.

HEARING OFFICER: Go ahead, please.

MS. SOLAGI: Well, I'll start, and she can add. Is that -- or is that --

HEARING OFFICER: So you can provide your comments right now, and then when you're done, we'll hand it over to her for her comments.

MS. SOLAGI Okay. That's fine.

HEARING OFFICER: Thank you.

MS. SOLAGI: So at any rate -- so we're concerned about the fact that Lincoln will be widened at that bridge point where there will be, theoretically, three lanes, a dedicated bus lane will go down the middle, and then when it comes to our part of Venice, the whole street is narrower. 1

And we like it narrower because we want it to be a more walkable street. You know, from -- we're talking from Venice Boulevard to Rose in Venice.

And so -- and -- and so we want to make sure that, whatever happens, takes that into account as -- as the street narrows and as that part of the street is being planned to be a more pedestrian-friendly area.

MS. TAYLOR ROSS: Is that all you need to say?

Letter PHWLA3

MS. SOLAGI: Well, we also have lots of ideas about landscaping for that part of Lincoln, and for, you know, different amenities. And we have multiple places that need some kind of help with crossing the street. So those -- I think those are, you know, our basic concerns.

Because -- Mindy can -- say whatever you want. I think I'm done.

HEARING OFFICER: Okay. Thank you, Laura.

Hi, Mindy. Thank you for participating. Thank you very much. Please state your name for the record and your address, and then you're welcome to state your comments. Thank you.

2

Letter PHWLA4

MS. TAYLOR ROSS: All right. Thank you.

I'm Mindy -- Mindy Taylor Ross. 1033 Nowita Place in Venice.

And my concerns about this effort, the Grace Streets effort is that Venice has a lot of development going on. We apparently have 15 percent of the outstanding permits for new, you know, renovations or new development in the whole city of L.A.; so 15 percent are Venice permits and would be fees paid for Venice projects.

So we feel that we aren't getting our money in our community and that we have to put up with all the dust and we're not getting any benefit of it. So we would like to

1

be -- have more amenities for Lincoln Boulevard between Venice Boulevard and Rose Avenue.

And that would be landscaping in the form of landscaping, street furniture, crosswalk improvements, and that kind of thing. 1

And we just think that, you know, Lincoln and Venice has been left out of the Grace Streets. And we think Lincoln is a pretty important street and it should get some TLC.

HEARING OFFICER: Okay. Thank you for your comments.

///

HEARING OFFICER: So you're Laura. Please go ahead.

MS. SOLAGI: Well, we had many ideas for Lincoln because we've been working on this for 15 years. And we started out working with Kevin Keller (phonetic) with Miskousky (phonetic) and then with --

MS. TAYLOR ROSS: Rosendahl (phonetic).

MS. SOLAGI: Rosendahl. With -- what's his name? 2 We just had it.

MS. TAYLOR ROSS: Grieg Asher (phonetic).

MS. SOLAGI: And then with Rosendahl.

MS. TAYLOR ROSS: Rosendahl?

MS. SOLAGI: No, Blumenfeld (phonetic). You

know, who was also Rosendahl's person. And we met with -- with the present person all about Lincoln.

And these have -- we've done a lot of work on this with all kinds of symposiums, with 150 people all day. And we've had, you know, students from UCLA from Shoup's -- Professor Shoup doing traffic studies for us. And so we've really put -- invested a lot of time and effort into this. And one -- so we had lots of ideas along the way.

2

And one of them was something that could be a temporary thing so that it wouldn't have to be ripped out, and that would be to take crosswalk areas and have artists paint with paint provided by the city, obviously, that is appropriate for streets, things in the crosswalk to create interesting crosswalks for Venice in particular.

For example -- I mean, this is just an example. On Palms Boulevard crossing Lincoln, you could have palm trees. On Rose you could have roses. Or you could have abstract things because this would be a simple, very Venice-y thing.

Another idea that we had was taking where they will have those double yellow lines that create a shape? Like -- I'm not sure. Is that clear?

3

MS. TAYLOR ROSS: MC Escher?

MS. SOLAGI: You know, like an island of -- you

can't drive on this part of the street.

Do you know what I'm saying?

HEARING OFFICER: You'd have to explain it.

MS. SOLAGI So you have a double -- you have a double yellow line, and then you have the double yellow line widen out into a shape where nobody is supposed to cross. It would be as if you had a cement barrier there. 3

And we were thinking of putting in plantings or sculpture or something of that sort, which I suppose could be removed.

Were there any other ideas we had?

HEARING OFFICER: So give me a second.

Are you done with your part so we can move on to her?

MS. TAYLOR ROSS: Another idea was a gateway of some kind at Rose, which is basically the gateway to Venice on Lincoln Boulevard, and a gateway project, artist-driven and possibly supported by the counsel office or the City in some way, where we can have a contest to have a gateway arch developed for Venice coming into Venice from the north and coming into Venice from the south, which would be at the 90 Freeway. 4

So that was another idea, of having some kind of gateway arches welcoming people to Venice, and maybe a artist contest of some kind.

HEARING OFFICER: Okay. Thank you, Mindy.

MS. SOLAGI: Another one. Laura again.

HEARING OFFICER: Laura. Okay.

MS. SOLAGI: We also had the idea of having architects propose different bus shelters that would be in -- in Venice, and having all different ones. You know, instead of collecting one design, having different designs; so that would be also indicative of the kinds of artistic endeavors that exist in Venice. 5

HEARING OFFICER: Okay. So I think this concludes this part. And we can definitely accept more comments till March 7th.

MS. SOLAGI Okay.

HEARING OFFICER: So please feel free to take the e-mails from the staff.

MS. SOLAGI: Okay. Thank you both very much.

-oOo-

C E R T I F I C A T E

I, Heatherlynn Gonzalez, a Certified Shorthand Reporter for the State of California, License Number 13646, do hereby attest that:

The preceding is a true and accurate transcription of the meeting of the organization named herein;

The meeting was taken down in shorthand and transcribed into English under my supervision and authority;

I have no interest, financial or otherwise, in any of the parties, issues, or individuals who are involved in this organization.

Attested to on this _____ day of _____, 2016.

_____

CERTIFIED SHORTHAND REPORTER

FOR THE STATE OF CALIFORNIA

PHWLA1 Paul Howard TH Architecture 2/2/2016

Response to Comment PHWLA1-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The Lincoln Boulevard Bridge Enhancement is currently in the conceptual planning phase. As described in Chapter 3, *Project Description,* of the Draft EIR, the proposed Lincoln Boulevard Bridge Enhancement would include cycle tracks on both sides of the roadway (a cycle track is a bicycle lane that is physically separated from adjacent vehicle travel lanes)and sidewalks on both sides of the street (the existing bridge does not provide sidewalks). This would improve the safety of both pedestrians and cyclists using the bridge. Please see Section 4.6, *Transportation,* of the Draft EIR for a discussion of impacts associated with transportation and traffic-related safety.

Response to Comment PHWLA1-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the improvements included in the Proposed Project list updates. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PHWLA1-3:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is concerned about safety for bicyclists and pedestrians along Centinela Avenue in the segment along the proposed streetscape plan, and particularly at the SR 90 freeway ramps. As discussed in Chapter 3, *Project Description,* of the Draft EIR, the goals of streetscape plans include enhancing walking and bicycling experiences on the street and improving pedestrian and bicycle safety. The safety impacts of the Proposed Project are discussed in Section 4.6, *Transportation,* of the Draft EIR under Impact 4.6-7 and were found to be less than significant. The implementation of bicycle and pedestrian facilities associated with the updated project lists are anticipated to improve safety. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Response to Comment PHWLA1-4:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The comment is regarding the improvements included in the Proposed Project list updates. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

PHWLA2 David Feuer 2/2/2016

Response to Comment PHWLA2-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

PHWLA3 Laura Silagi Venice Community Coalition 2/2/2016

Response to Comment PHWLA3-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The commenter is generally expressing support for the Lincoln Bridge improvements and requesting that the northern portion of Lincoln Boulevard between Venice Boulevard and Rose Avenue be maintained as a pedestrian friendly street. The comment does not identify any specific issues with the EIR analysis or conclusions and provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PHWLA3-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No response is required because the comment is not addressed to the adequacy of the EIR. The commenter is asking for additional improvements to be included in the project lists to be paid in part with the proposed updated fee. The comment does not identify any specific issues with the EIR analysis or conclusions and provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

PHWLA4 Mindy Taylor-Ross 2/2/2016

Response to Comment PHWLA4-1:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No response is required because the comment is not addressed to the adequacy of the EIR. The commenter is asking for additional improvements to be included in the project lists to be paid in part with the proposed updated fee. The comment does not identify any specific issues with the EIR analysis or conclusions and provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PHWLA4-2:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No response is required because the comment is not addressed to the adequacy of the EIR. The commenter is asking for additional improvements to be included in the project lists to be paid in part with the proposed updated fee. The comment does not identify any specific issues with the EIR analysis or conclusions and provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PHWLA4-3:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No response is required because the comment is not addressed to the adequacy of the EIR. The commenter is asking for additional improvements to be included in the project lists to be paid in part with the proposed updated fee. The comment does not identify any specific issues with the EIR analysis or conclusions and provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PHWLA4-4:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No response is required because the comment is not addressed to the adequacy of the EIR. The commenter is asking for additional improvements to be included in the project lists to be paid in part with the proposed updated fee. The comment does not identify any specific issues with the EIR analysis or conclusions and provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response to Comment PHWLA4-5:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No response is required because the comment is not addressed to the adequacy of the EIR. The commenter is asking for additional improvements to be included in the project lists to be paid in part with the proposed updated fee. The comment does not identify any specific issues with the EIR analysis or conclusions and provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

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CHAPTER 3
MITIGATION MONITORING PROGRAM

Public Resources Code (PRC) Section 21081.6 and California Environmental Quality Act (CEQA) Guidelines Section 15097 require adoption of a Mitigation & Monitoring Plan (MMP) for all projects for which an Environmental Impact Report (EIR) has been prepared. This requirement was originally mandated by Assembly Bill (AB) 3180, which was enacted on January 1, 1989 to ensure the implementation of all mitigation measures adopted through the CEQA process. Specifically, PRC Section 21081.6 states that "…the agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment…[and that the program]…shall be designed to ensure compliance during project implementation."

AB 3180 provided general guidelines for implementing monitoring and reporting programs, which are enumerated in more detail in State CEQA Guidelines Section 15097. However, specific reporting and/or monitoring requirements to be enforced during project implementation shall be defined prior to final approval of the City of Los Angeles Coastal Transportation Corridor Specific Plan (CTCSP) and West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP) Specific Plans Amendment Project (referred to as the "Proposed Project") by the decision-maker. In response to established CEQA requirements, the MMP shall be submitted to the City of Los Angeles (Lead Agency) for consideration prior to certification of the EIR. Although the Lead Agency may delegate monitoring responsibilities to other agencies or entities, the Lead Agency "…remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program."

The MMP describes the procedures for the implementation of the mitigation measures to be adopted for the Proposed Project as identified in the Draft EIR and the Final EIR. The MMP for the Proposed Project will be in place through the planning horizon of the CTCSP (2035) and WLA TIMP (2035) or until the Plans and EIR are updated again. The City of Los Angeles Department of Transportation (LADOT) and Department of City Planning (DCP) shall be responsible for administering the MMP activities or delegating them to staff, other City departments (e.g., Department of Building and Safety [DBS], Department of Public Works [DPW], etc.), consultants, or contractors. The City may choose to designate one or more environmental monitor(s) (e.g. City building inspector, project contractor, certified professionals, etc., depending on the provision specified below).

Each mitigation measure is identified in Table 3-1 below (Mitigation Monitoring Program) and is categorized by environmental topic and corresponding number, with identification of:

- The Implementing Agency
- The Enforcement Agency and Monitoring Agency – this is the agency or agencies that will monitor the measure and ensure that it is implemented in accordance with this MMP
- Monitoring Phase/Monitoring Actions—these are the criteria that would determine when the measure has been accomplished and/or the monitoring actions to be undertaken to ensure the measure is implemented

All agencies and departments are in the City of Los Angeles, unless otherwise noted. The implementing, enforcement, and monitoring agencies have authority to determine the applicability and compliance of all mitigation measures in their reasonable discretion.

PRC Section 21002 requires the City to adopt feasible mitigation measures (or feasible environmentally superior alternatives) in order to substantially lessen or avoid the otherwise significant adverse environmental impacts of proposed projects. Mitigation measures are to be capable of substantially lessening or avoiding the otherwise significant adverse environmental impacts of the proposed project.

As this is a long term project and technology and circumstances may change, the Implementing and Enforcement Agency may waive a mitigation measure, consistent with the requirements of CEQA (including case law) where the agency finds, based on substantial evidence, that the mitigation measure is no longer necessary to mitigate the identified significant impact (e.g., another regulatory agency requires an equal or more effective requirement; the City has adopted equally or more effective regulations that are applicable to the subsequent project; the particulars of the subsequent project makes the standard unnecessary to address the impact intended to be mitigated; or new technology has made the standard unnecessary to mitigate the impact) or is impossible or infeasible to implement. The agency shall document the finding in writing, and where the mitigation is found infeasible or impossible, consider whether subsequent CEQA analysis is necessary under State CEQA Guidelines Section 15162. Nothing in this paragraph is intended to modify the requirements of CEQA.

Table 3-1 Mitigation Monitoring Program

NO.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase/ Monitoring Actions
Air Quality				
MM-AQ-1	**Tier 3 Emission Standards and Diesel Particulate Filters.** All off-road diesel-powered construction equipment greater than 50 horsepower shall meet USEPA Tier 3 emission standards when used during construction of the Lincoln Boulevard and Sepulveda Boulevard BRTs, Lincoln Boulevard Bridge Enhancement, reconfiguration of the I-10 ramps at Bundy Drive, and other projects that are demonstrated to result in significant impacts by project-specific modeling. If the contractor can demonstrate that a specific piece of Tier 3 equipment cannot be reasonably obtained, the contractor shall use equipment that meets USEPA Tier 2 emission standards and be equipped with a CARB-verified Diesel Emissions Control Strategies (VDECS). [Applies to Lincoln Boulevard Bridge Enhancement, Lincoln Boulevard BRT, Sepulveda Boulevard BRT, and I-10 Ramp Reconfiguration at Bundy Drive]	Department of Transportation; Department of Building and Safety; Department of Public Works Bureau of Engineering	Department of Building and Safety	*Pre-construction:* Approval of equipment prior to initiation of construction. Construction: Compliance with specified construction-phase measures.
MM-AQ-2	**Fugitive Dust Control.** In order to ensure compliance with, or exceedance of, the requirements associated with SCAQMD Rule 403, construction activities shall include watering disturbed soil at least 3 times daily, or as often as necessary to maintain or exceed a soil moisture content of approximately 12 percent. Additional steps shall be taken, if necessary, to stabilize disturbed soil and stock piles to eliminate visible dust emissions. [Applies to Lincoln Boulevard Bridge Enhancement, Lincoln Boulevard BRT, Sepulveda Boulevard BRT, and I-10 Ramp Reconfiguration at Bundy Drive]	Department of Transportation; Department of Building and Safety; Department of Public Works Bureau of Engineering	Department of Building and Safety	*Construction:* Compliance with specified construction-phase measures.
MM-AQ-3	**Construction Electricity.** Electricity for construction activities shall be obtained from power poles or portable diesel-fueled generators using "clean burning diesel" fuel and exhaust emission controls. [Applies to Lincoln Boulevard Bridge Enhancement, Lincoln Boulevard BRT, Sepulveda Boulevard BRT, and I-10 Ramp Reconfiguration at Bundy Drive]	Department of Transportation; Department of Building and Safety; Department of Public Works Bureau of Engineering	Department of Building and Safety	*Pre-construction:* Coordination with Department of Water and Power regarding access to grid power; alternately, approval of equipment prior to initiation of construction. Construction: Compliance with specified construction-phase measures.
Biological Resources				
MM-BR-1	**Migratory Birds.** To prevent the disturbance of nesting native and/or migratory bird species during construction, the City shall require that clearing of street trees or other vegetation take place between September 1 and January 30. If construction is scheduled or ongoing during bird or raptor nesting season (January 31 to August 31), the City of Los Angeles shall require that a qualified biologist conduct two nest surveys, one 15 days and the second 72 hours prior to	Department of City Planning; Department of Transportation	Department of City Planning; Department of Transportation	*Pre-construction:* Biological survey of street trees and other vegetation for construction during nesting season.

NO.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase/ Monitoring Actions
	the commencement of construction activities. Surveys shall be conducted in accordance with CDFW protocols, as applicable. If no active nests are identified on or within 200 feet of the construction activity, no further mitigation is necessary. A copy of the preconstruction survey shall be submitted to the Department of City Planning. If an active nest is identified, construction shall be suspended within 200 feet of the nest, or an alternative distance determined to be appropriate by a qualified ornithologist or biologist, until the nesting cycle is complete, as determined by a qualified ornithologist or biologist.			
MM-BR-2	**Special-Status Species and Habitat.** For CTCSP and WLA TIMP transportation improvement projects that would be constructed within 200 feet of a Significant Ecological Area designated by the County of Los Angeles, a project-specific biological resource survey and assessment shall be conducted by a qualified biologist and prepared prior to project construction that identifies the biological resources within 200 feet and any potential impacts to special status species and habitats. If it is determined during these biological resources surveys that special status species could occur and be impacted by the Proposed Project, focused surveys shall be conducted by a qualified or permitted biologist, as required, in coordination with USFWS and/or CDFW. If potential impacts are identified that cannot be avoided through modification of project design, species- and habitat-specific mitigation measures shall be developed to avoid or reduce project-related impacts. Such measures could include seasonal restrictions on construction, monitoring by a qualified biological monitor during construction, salvage and replacement of native plants, and restoration of sensitive natural communities or habitat following construction. These measures shall be established through the permitting process under Federal and State Endangered Species Acts, as appropriate.	Department of Transportation	Department of Transportation, United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW)	*Pre-construction:* A biological resource survey, prepared by a qualified biologist, for all improvement projects within 200 feet of a Significant Ecological Area. *Construction:* Adherence to measures identified in survey, such as monitoring by a qualified biological monitor during construction.
MM-BR-3	**Wetlands and Jurisdictional Waters.** For transportation improvements that may result in temporary or permanent impacts to federal and/or state jurisdictional waters or wetlands, all applicable permits shall be acquired. These permits include, but would not be limited to, Section 404 and Section 408 permits, a Section 401 Water Quality Certification, a Section 10 permit, and a Streambed Alteration Agreement. During design of the Lincoln Boulevard Bridge Enhancement, encroachment into jurisdictional waters and wetlands shall be minimized to the greatest extent feasible. All conditions of the Section 408 permit shall be met to address the alteration of the Ballona Creek flood control channel to ensure there would be no significant changes to the pre-project hydrology in order to maintain its capacity for flood management. All conditions of the Section 404 permit from the USACE and Streambed Alteration Agreement from the CDFW shall be met. As part of this compliance, compensatory mitigation may be required to offset the impact related to	Department of Transportation	Department of Transportation, United States Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW)), Los Angeles Regional Water Quality Control Board (LARWQCB)	*Pre-construction:* Preparation and completion of permitting applications/process. *Construction:* Adherence to conditions and mitigation requirements set in the permits. *During Operations:* Mitigation monitoring over a period of five to ten years following completion of construction of the compensatory mitigation project, if required.

NO.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase/ Monitoring Actions
	placement of permanent fill in jurisdictional waters. The exact compensatory mitigation ratio will be determined at the time the permit is issued and would be based on the type and value of the wetlands affected by the project; agency standards typically require a minimum of 1:1 for restoration and 3:1 for construction of new wetlands. In addition, all conditions of the Wetland Mitigation and Monitoring Plan as required by USACE for federal jurisdictional waters and CDFW for state jurisdictional waters shall be met. The Wetland Mitigation and Monitoring Plan shall include the following: ▪ Descriptions of the wetland types, and their expected functions and values. ▪ Performance standards and monitoring protocol to ensure the success of the mitigation wetlands over a period of five to ten years following completion of construction of the compensatory mitigation project. ▪ Engineering plans showing the location, size and configuration of wetlands to be created or restored. ▪ An implementation schedule showing that construction of mitigation areas shall commence prior to or concurrently with the initiation of construction. ▪ A description and proof of legal protection measures for the preserved wetlands (i.e., dedication of fee title, conservation easement, and/ or an endowment held by an approved conservation organization, government agency or mitigation bank). [Applies to Lincoln Boulevard Bridge Enhancement]			
Noise and Vibration				
MM-N-1	**Construction Noise.** Prior to construction, a noise control plan (NCP) shall be developed by a qualified noise specialist, as approved by the City of Los Angeles Department of Building and Safety. The NCP shall identify the procedures for predicting construction noise levels at sensitive receptors and shall describe the reduction measures required to minimize construction noise. Construction activity lasting more than one day and increasing ambient noise by more than 10 dBA or more at a noise sensitive use, or resulting in increases in ambient noise of 5 dBA or more at a noise sensitive use more than ten days in a three-month period, shall incorporate noise-reducing measures. These measures may include, but are not limited to: ▪ Install temporary sound barriers (e.g., soundwall) between the construction site and sensitive receptors and/or place portable sound blankets around sandblasting and jackhammering operations, as well as around construction activities that involve vibratory rollers. ▪ Equip construction equipment with the most effective locally available commercial mufflers, along with any other suitable noise attenuation devices	Department of Transportation; Department of Building and Safety	Department of Building and Safety	*Pre-construction:* Preparation of noise study and meeting with contractors and project managers. *Construction:* Adherence to measures; communication with the public.

NO.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase/ Monitoring Actions
	(e.g., acoustically attenuating shields, shrouds, or enclosures). Contractor shall be responsible for maintaining equipment consistent with the manufacturers' standards to assure that no additional noise would be generated due to improperly maintained and worn parts. ▪ Scheduling operations of high impact equipment (e.g., pile driver, vibratory roller, tractor/loader/backhoe, haul trucks) during the middle of the day so as to reduce early morning and late evening impacts when residents are likely to be home. ▪ Placing stationary construction equipment (e.g., compressors, generators) as far away from sensitive land uses, as feasible. ▪ Unnecessary idling of equipment and vehicles shall be prohibited. Idling of haul trucks shall be limited to five minutes or less, as required by the South Coast Air Quality Management District rules. ▪ The public shall be kept informed of the construction hours and days, especially those of pile driving. The public information shall provide contact information for complaints. Noise complaints shall be logged and construction activities shall be evaluated to determine if additional noise mitigation is necessary and feasible. ▪ A pre-construction meeting with contractors and project managers shall be conducted to confirm that noise mitigation procedures are in place.			
MM-N-2	**Construction Vibration.** An evaluation of project-specific vibration levels shall be completed by a qualified vibration specialist, as determined by the City of Los Angeles Department of Building and Safety for any project that is less than 81 feet from a residence. Vibration reducing measures, such as use of lighter weight equipment or use of equipment that produces less vibration, shall be implemented for potentially significant vibration impacts, if technically feasible. In addition, operation of high vibration impact equipment in proximity to sensitive receptors shall be scheduled during the middle of the day so as to reduce human annoyance in the early morning and late evening when residents are likely to be home.	Department of Transportation; Department of Building and Safety	Department of Building and Safety	*Pre-construction:* Preparation of noise study. *Construction:* Adherence to measures.
Transportation				
MM-T-1	**Technology Upgrades and Intersection Improvements.** As the City of Los Angeles implements projects in the updated project lists that would impact vehicular operations by resulting in the removal of a vehicular travel lane along a roadway or the removal of a through lane or turn-lane at an intersection, LADOT shall implement ITS signal and corridor upgrades, major intersection improvements such as turn-lane or safety improvements, and/or congestion monitoring technology upgrades both along project routes and parallel roadways if traffic diversions have occurred as a result of the Proposed Project. Improvements to be	Department of Transportation	Department of Transportation	*Pre-construction or prior to operation:* Coordination between the Departments of City Planning and Transportation to identify and implement appropriate signal timing based on the

NO.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase/ Monitoring Actions
	implemented shall be determined based on an analysis of project-specific impacts conducted according to LADOT Traffic Study Policies and Procedures guidelines.			characteristics of the mobility improvement.
MM-T-2	**Neighborhood Protection Program.** As the City of Los Angeles implements projects in the updated project lists that would impact vehicular operations by resulting in the removal of a vehicular travel lane along a roadway that could potentially result in diversion of traffic to adjacent residential streets, LADOT shall implement the Neighborhood Protection Program on the impacted residential streets based on an analysis of project-specific impacts conducted according to LADOT Traffic Study Policies and Procedures guidelines.	Department of Transportation	Department of Transportation	*Periodic monitoring during operation:* Conduct traffic counts and assess whether traffic diversion triggered by the proposed mobility improvements requires traffic calming measures to reduce significant impacts to residential neighborhoods.
MM-T-3	**Coordination with Other Agencies on Transportation Improvements and Funding.** As the City of Los Angeles implements projects in the updated project lists that could potentially impact vehicular operations as determined by LADOT on transportation systems managed by other agencies, such as Caltrans or Metro, or neighboring jurisdictions, the City of Los Angeles shall coordinate with these entities to identify transportation improvements and seek opportunities to jointly pursue funding. Mobility solutions shall be focused on safety, enhancing mobility options, improving access to active modes, and implementing TDM measures to achieve both local and regional transportation and sustainability goals.	Department of Transportation, Department of City Planning	Department of Transportation	*Pre-construction and periodic monitoring during operation:* Coordination and identification of improvements that could be implemented with joint funding.
MM-T-4	**Traffic Control Plan.** Construction activities that may result from the buildout of improvements on the Proposed Project lists will be evaluated on a project-by-project basis by DOT for construction-related impacts to traffic. Construction activities will be managed through the implementation of a traffic control plan, approved by DOT, to mitigate the impact of traffic disruption and to ensure the safety of all users of the affected roadway, including, as appropriate, through the use of temporary traffic signals, detours, or the use of flagmen adjacent to construction activities.	Department of Transportation	Department of Transportation	*Pre-construction:* Preparation of traffic control plan to identify potential construction traffic impacts, and the identification of measures to minimize construction impacts and ensure the safety of proposed improvements. *Construction:* Adherence to measures.

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CHAPTER 4
REFERENCES

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No references were cited in this chapter.

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Appendix A
Comment Letter Attachments

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Comment Letter A3 Attachments

ADJACENT CONSTRUCTION DESIGN MANUAL

1.0 INTRODUCTION

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

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

A. Site Plan

B. Drainage Area Maps and Drainage Calculations

C. Architectural drawings

D. Structural drawings and calculations

E. Civil Drawings

F. Utility Drawings

G. Sections showing Foundations and MTA Structures

H. Column Load Tables

I. Pertinent Drawings and calculations detailing an impact on MTA facilities

J. A copy of the Geotechnical Report.

K. Construction zone traffic safety and detour plans: Provide and regulate positive traffic guidance and definition for vehicular and pedestrian traffic adjacent to the construction site to ensure traffic safety and reduce adverse traffic circulation impact.

L. Drawings and calculations should be sent to:

MTA Third Party Administration (Permits Administration)
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, California 90012

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

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

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

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

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

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

1.7 Qualified Seismic, Structural and Geotechnical Oversight

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

2.0 REVIEW PROCEDURE

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

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

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

2.4 Monitoring of the inside of MTA tunnels and structures shall be required when the adjacent

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

2.5 The calculations submitted for review shall include the following:

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

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

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

D. Reference to pertinent codes and standards.

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

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

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

H. Identify results and conclusions.

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

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

A. Program Name.

B. Program Abstract.

C. Program Purpose and Applications.

D. Complete descriptions of assumptions, capabilities and limitations.

E. Instructions for preparing problem data.

F. Instructions for problem execution.

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

H. Description of deficiencies or uncorrected errors.

I. Description of output options and interpretations.

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

K. Computer printout of all supporting calculations.

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

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

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

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

3.0 MECHANICAL CRITERIA

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

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

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

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

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

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

4.0 OPERATIONAL REQUIREMENTS

4.1 GENERAL

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

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

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

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

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

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

4.2 OVERHEAD PROTECTION - Station Entrances

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

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

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

B. Lighting in public areas and around affected MTA facilities shall be provided under the overhead protection to maintain a minimum level of twenty-five (25) footcandles at the escalator treads or at the walking surface. The temporary lighting shall be maintained by the Party.

C. Wooden construction fencing shall be installed at the boundary of the areas with public access. The fencing shall be at least eight-feet high, and shall meet all applicable code requirements.

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

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

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

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

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

E. Temporary sidewalks or pedestrian ways, which will be in use more than 10 days, shall be7constructed of four (4") inch thick Portland cement concrete or four(4") inches of asphaltic concrete placed and finished by a machine.

4.3 OVERHEAD PROTECTION - Operating Right-of-Way Trackage

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

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

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

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

4.4 OTHER METRO FACILITIES

A. Access and egress from the public streets to fan shafts, vent shafts and emergency exits must be maintained at all times. The shafts shall be protected from dust and debris. See

Exhibit A for details.

B. Any excavation in the vicinity of MTA power lines feeding the Metro System shall be through hand excavation and only after authorization has been obtained through the MTA Track Allocation process. MTA Rail Operations Control Center shall be informed before any operations commences near the MTA power system.

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

D. Isolation of MTA Facilities from Blast

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

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

4.5 SAFETY REGULATIONS

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

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

C. Party and contractor personnel while within the operating MTA right-of-way shall

coordinate all safety rules and procedures with MTA Rail Operations Control Center.

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

5.0 CORROSION

5.1 STRAY CURRENT PROTECTION

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

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

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

End of Section

Comment Letter PC1 Attachments

CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS

infrastructure 2010-11 report card

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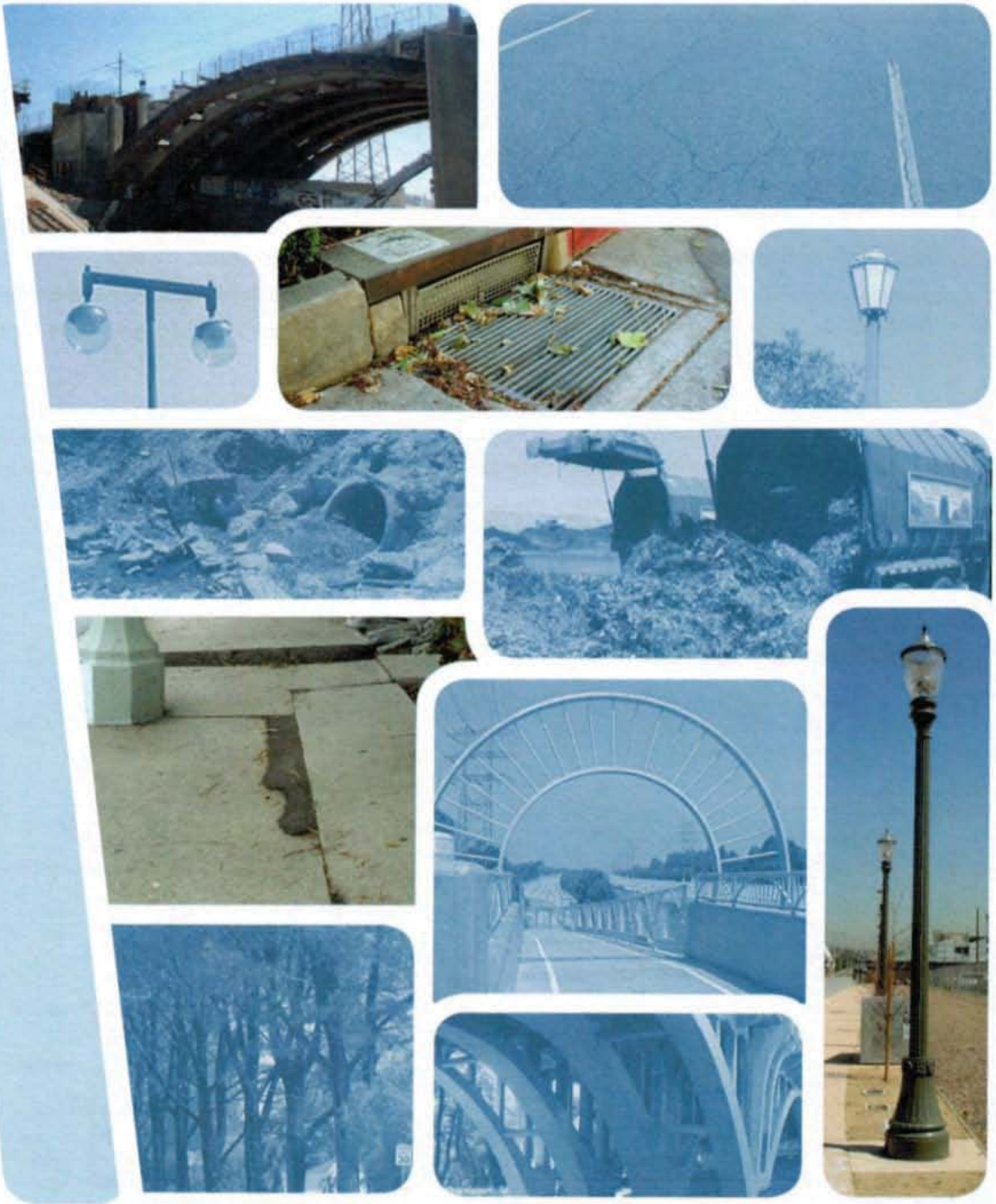

Welcome Letter

Dear Reader,

The City of Los Angeles Department of Public Works is pleased to present its Infrastructure Report Card (IRC) and hope that you will find it informative.

The purpose of the IRC is twofold. The first is to provide you with the current condition reflected by a grade as compared to the recommended grade for each of the infrastructure systems under the control of Public Works. Secondly, this Infrastructure Report Card gives recommendations on how to improve each of these systems.

On a daily basis, City residents depend on this infrastructure for economic prosperity, public safety, and quality of life. Looking forward, our City will remain competitive through meeting our current and future infrastructure needs by putting the Infrastructure Report Card's recommendations into action.

Sincerely,

BOARD OF PUBLIC WORKS COMMISSIONERS

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Ed Ebrahimian, Bureau of Street Lighting

William A. Robertson, Bureau of Street Services

What the Letter Grade Means...

Our Infrastructure Report Card has been developed as a resource to analyze the current condition of our key infrastructure assets and provides recommendations on how to maintain and strengthen these assets. This report examines our infrastructure and evaluates the status of assets using a methodology comparable to that used by the American Society of Civil Engineers. Seven key components of each infrastructure system were considered but not weighted, including:

- **Capacity** – Evaluate the infrastructure's capacity to meet current and future demands through 2015.
- **Condition** – Evaluate the infrastructure's existing or near future physical condition.
- **Funding** – Identify the current level of funding (from all sources) for the infrastructure category and evaluate the estimated funding needs through 2015.
- **Future Need** – Evaluate the cost to improve the infrastructure and determine if future funding prospects will be able to meet needs through 2015.
- **Operation and Maintenance** – Evaluate the owner's ability to operate and maintain the infrastructure properly and design the infrastructure in compliance with government regulations.
- **Public Safety** – Evaluate to what extent the public's safety is jeopardized by the condition of the infrastructure and the potential consequences of failure.
- **Resilience** – Evaluate the infrastructure system's capability to prevent or protect against significant multi-hazard incidents and the ability to recover quickly and reconstitute critical services with minimum damage to public safety, health, the economy, and national security.

Additionally, throughout the grading process, data was researched, compiled, and analyzed to determine an initial grade and then validated to determine the final grade for each of the City's infrastructure assets.

A	**Exceptional**	The infrastructure: • meets current capacity and anticipated capacity needs for the next five years, • meets all regulatory requirements, • is within its design lifespan or is regularly inspected and determined to be in good condition, and • has enough funding secured for all anticipated maintenance and upgrades anticipated before 2015.
B	**Good**	Minor changes required in one or more of the above areas to enable the infrastructure system to be fit for its current and anticipated future purposes.
C	**Adequate**	Major changes required in one or more of the above areas to enable infrastructure to be fit for its current and future anticipated purposes.
D	**Poor**	Critical changes required in one or more of the above areas to be fit for its current and future anticipated purposes.
F	**Failing**	Inadequate to meet current and future needs.

When applicable, industry standard rating criteria were also considered when determining the letter grade for each system. For example, "Bridges" uses the Federal Highway Administration's Sufficiency Rating as a basis of evaluation for each bridge.

The Report Card at a Glance

www.dpw.lacity.org/IRC2011.pdf

The Department of Public Works is responsible for maintaining the infrastructure systems listed below. This table shows each system's current grade and the recommended grade. Please note that the sections within the IRC are devoted to a specific infrastructure system's history, assessment, and recommendations (including grade determination).

SYSTEM	CURRENT GRADE	RECOMMENDED GRADE
Bridges	C-	B
Flood Control	B-	B
Sidewalks	D+	C+
Solid Resources	B-	B+
Streets	C	B
Street Lighting	C	B
Street Trees	C+	B
Urban Runoff	D	C
Wastewater Collection	B-	B+
Wastewater Treatment Plants	B-	B

about our department

We Work for You!

The City of Los Angeles Department of Public Works is comprised of the Board of Public Works and the Bureaus of Contract Administration, Engineering, Sanitation, Street Lighting, and Street Services. We are the City's third largest department and are responsible for the construction, renovation, and the operation of City facilities and infrastructure as well as providing many of the day-to-day services such as trash pick up, street lighting, and street repair to City residents.

As the City of Los Angeles keeps pace with the needs of its people, the Board of Public Works continues its leadership tradition with more than 100 years of service to the community. We are an executive team consisting of five members who are selected and appointed by the Mayor and confirmed by City Council to five-year terms.

We set policy and manage the Department while each of the Public Works Bureaus has a General Manager, appointed by the Mayor. The General Manager is responsible for providing the administrative and financial oversight of the day-to-day operations of the Bureau.

Quality, Opportunity, and Compliance

The Bureau of Contract Administration constitutes one of the premier contract administration organizations in the world. Inspectors and Compliance Officers apply their technical expertise to ensure that the policies and procedures governing contracting in the City are rigorously and equitably enforced. We work hard to protect the public interest and take satisfaction in knowing that we play a vital role in constructing quality public improvements to be enjoyed by the City's residents.

To achieve this mission, we administer contracts and permits for public works construction and improvement projects such as streets, sewers, storm drains, street lighting, and public facilities, such as libraries and police stations. Other responsibilities include inspecting public works projects on a daily basis to ensure work constructed on public property is of the highest possible quality, meets specifications, and is completed on schedule and within budget. We also monitor all contracts for compliance to Federal,

State, and City laws and policies related to prevailing wage, affirmative action, and the Minority/Women Business Enterprise and Other Business Enterprise Subcontractor Outreach Program.

Serving the Present; Designing the Future

The Bureau of Engineering's goal is to be the "provider of choice" for our clients. Our Mission is to be recognized as a national leader in the delivery of sustainable capital projects by Fiscal Year 2016/2017. We have a work force of more than 900 engineers, architects, surveyors, and other specialty staff, as well as support staff, with hundreds of active projects totaling $2.8 billion in construction value.

Our services are best described by summarizing our core functions. We plan, design, survey and manage construction of traditional infrastructure to protect public health and improve mobility. These infrastructure elements include the wastewater collection system, wastewater treatment and reclamation plants, the flood control system, and the street system including bikeways and bridges. We plan, design and manage construction of public buildings (vertical infrastructure) to improve the livability of the City by providing sustainable and environmentally sensitive building and landscape designs for new City buildings, and modifications to existing City buildings that include Police, Fire, recreational, and library facilities. We also support the economic development of the City through the issuance of permits, checking of plans and establishment of requirements for the construction of public right-of-way components of privately and publicly funded facilities, issuing more than 15,000 permits annually.

Our array of project management, planning, design and construction management services is available to all City Departments. Some of our specialized services include water-efficient landscape designs, environmental investigations and documentation, geotechnical studies, land development infrastructure requirements, real estate and property analysis, and specialized mapping and analytical Geographic Information System services. In addition, the Bureau is leading the effort to green City facilities. To date, 42 facilities have completed the United States Green Building Council's LEED rating process, with 25 Certified facilities, 7 Silver facilities, 8 Gold facilities, and 2 Platinum facilities.

Working Hard Every Day for a Sustainable in L.A.

The Bureau of Sanitation takes pride in our vision of being an organization that sets the benchmark for outstanding customer service and responding to the challenges of tomorrow. We accomplish our mission of protecting public health and the environment through our primary responsibilities which are to collect, clean, and recycle solid and liquid waste generated by residential, commercial, and industrial users in the City of Los Angeles and surrounding communities.

We carry out our responsibilities by the management and administration of three primary programs which are the Cleanwater Program, Solid Resources, and Watershed Protection. The Cleanwater Program is consisted of the world's largest wastewater collection and treatment systems. Our 6,700 miles of sewers serve more than four million residential and business customers in Los Angeles and 29 contracting cities and agencies. Solid Resources collects refuse, recyclables, yard trimmings, and bulky items from more than 750,000 homes, with an average of 6,652 tons per day. Watershed Protection is a broad-based program that uses a multi-pronged approach to reduce water pollution and improve the City's receiving waters and their aquatic environments.

Bright Lights - Safe Nights

The Bureau of Street Lighting designs, constructs, operates, maintains and repairs the City's streetlights. The City's streetlight system has more than 210,000 streetlights, incorporating more than 400 different varieties of lights and covers 5,000 of the City's 6,500 centerline miles. We are also responsible for the financial administration of the Street Lighting Maintenance Assessment Fund. We provide quality, timely, cost-effective and courteous service to the communities of Los Angeles in lighting of streets and public ways within established authorities and by encouraging residents to report damaged or out-of-service street lights in their neighborhoods.

We are committed to reducing light, pollution glare, and light trespass through our membership in the International Dark Sky Association which supports crafting local, state, and national lighting ordinances to ensure starry spaces for future generations.

Providing Quality Street Services in a Timely and Efficient Manner

The Bureau of Street Services provides roadway maintenance, improvement, resurfacing and reconstruction of streets and related structures and engineering design of streets and streetscapes in the City of Los Angeles. In addition, we provide maintenance, repair, and improvement of approximately 7,300 centerline miles of public streets, alleys and related structures, making approximately 250,000 repairs per year. We resurface and reconstruct 150 to 200 miles of streets annually as well as clean public streets and alleys using a variety of methods including machine sweeping more than 600,000 curb miles per year. We are responsible for maintaining and preserving the City's 700,000 trees within the urban forest. We are responsible for the maintenance of over 290 acres of landscaped median islands, enforcement of City Ordinances related to street trees, and enforcement of the Annual Weed Abatement Ordinance for over 12,000 private parcels and City-owned lots. We enforce the State and City's Municipal Codes governing the use of public right of way to correct violations affecting public health and safety.

City's Blue Ribbon Task Force on Infrastructure

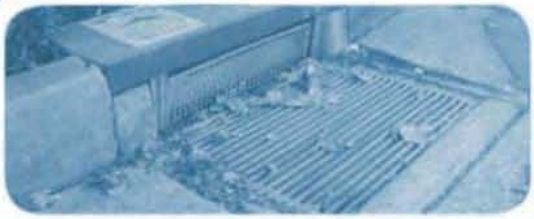
In 2003, the City of Los Angeles formed the Blue Ribbon Task Force on Infrastructure, comprised of experienced professionals from the infrastructure stakeholder community. The charge of the Blue Ribbon Task Force was to assess the condition of the City's infrastructure assets, identify the condition level to which these assets should be maintained, and determine the resources required to repair, maintain, replace, rehabilitate and expand the City's infrastructure assets over a 10-year planning horizon (2004 – 2013).

The Blue Ribbon Task Force met with the General Managers and staff from the City's departments responsible for managing infrastructure systems. The departments reported on the current condition, performance, capacity and demands placed on the City's infrastructure. Additionally, each provided analysis and plans to support the infrastructure investment needs assessment. Subsequently, the Blue Ribbon Task Force's final recommendations included expenditure plans, funding strategies, and proposed a $29.9 billion ten-year program to begin addressing the most critical of the City's infrastructure investment needs.

Infrastructure Report Cards and GASB 34

It is important to clarify that the purpose of the City's IRC is quite different from that of the reporting the City does to comply with Governmental Accounting Standards Board (GASB) Statement 34. The IRC is used to strengthen the public's understanding of the conditions of infrastructure systems, communicate the need to maintain acceptable condition levels for infrastructure, and guide policy decisions for sustainable infrastructure management. GASB 34 is a required financial management mechanism that uses highly detailed cost methodologies to report the City's infrastructure assets in the City's financial statements, including the City's Comprehensive Annual Financial Report.

There is no direct correlation between the financial reporting, i.e. capital costs expended, and the condition of the infrastructure assets. Using the capital expenditures for infrastructure assets, as required for GASB 34, and attempting to determine the condition of the assets from this alone are not feasible.



BRIDGES

overview

There are 602 bridges in the City of Los Angeles. The Bureau of Engineering manages the maintenance, retrofit, rehabilitation, and reconstruction of 507 bridges, with the remaining 95 bridges owned and maintained by other agencies.

Public Works bridge construction started in the early 1900s. Between 1910 and 1940, 210 bridges were built in the City of Los Angeles, of which 16 are historical. Fourteen of these historical bridges are built over the Los Angeles River. By the late 1960s, most of the City's bridges had been built.

In 1975, the City Council approved the Seismic Safety Plan that was designed to mitigate earthquake hazards. As a result, structural analysis of the existing bridges to determine adequacy to resist earthquake loads began in Fiscal Year 1978-79. Bridges requiring seismic bracing were incorporated into the Capital Improvement Program funded by the Gas Tax. By 1985, 22 bridges had been upgraded at a cost of $3.8 million.

Soon after the Loma Prieta earthquake of October 17, 1989, the City Council placed a bond issue (Proposition G) on the ballot as a lifesaving measure to strengthen seismically-deficient buildings and bridges. Passage of Proposition G provided $176 million for seismic strengthening of bridges. Under the first phase, bridges were seismically upgraded at a total construction cost of $120 million.

The 2003 City's Blue Ribbon Task Force Report presented a condition assessment of the City's infrastructure for bridges. It was concluded that 83 bridges were structurally deficient or functionally obsolete, and the majority exceeded their 50-year design life. These 83 bridges were programmed into the 10-Year Capital Improvement Program which is managed by the Bureau of Engineering with funding from Federal and Proposition funds. Due to funding shortages, only 24 projects have been completed, leaving 59 projects for the next 10-Year Capital Improvement Program.

description

Of the 602 bridges in Los Angeles, there are 438 vehicular bridges, 89 pedestrian bridges, 35 tunnels, two bikeway bridges, 35 railroad bridges, and three miscellaneous utility bridges. Currently, 280 bridges are more than 50 years old. Regular inspection of bridges is shared by the California Department of Transportation (Caltrans) and the Bureau of Engineering with 427 bridges inspected by Caltrans and 175 bridges inspected by the BOE.

In addition to the inspection of 175 bridges, the Bureau of Engineering's Structural Engineering Division maintains a detailed database of all the City's bridges, including the entire bridge inventory, inspection data, repair requests, structural condition of various bridge and tunnel elements, sufficiency ratings, cost data, traffic and geometric data.

Bridges are repaired and improved through a variety of funding sources including Proposition G, the Highway Bridge Program by the Safe, Accountable, Flexible Efficient Transportation Equity Act: A Legacy for Users, Proposition C, the Capital Improvement Program, and the State's Local Seismic Safety Retrofit Program funds.

assessment

Each bridge is physically inspected biennially, analyzed for load-carrying capacity, and then a Sufficiency Rating is computed. Bridges are individually rated by Sufficiency Rating. This rating is computed in accordance with the national standards developed by the Federal Highway Administration and is based on structural adequacy, safety, essentiality for public use, serviceability, and functional obsolescence. Sufficiency Ratings range from 0 to 100 following a standard grading system.

A modified Federal Highway Administration Sufficiency Rating is the basis for the bridges assessment used in this Infrastructure Report Card. The modified Sufficiency Rating includes weighting factors for the size and age of each bridge. This assessment methodology is used to establish the current overall Bridge system grade of C- for City maintained bridges (507 of 602).

For a complete listing of the bridges and their assessment, see the Department of Public Works, Bureau of Engineering's intranet page at http://boe.ci.la.ca.us/techdocs/ircbridges.pdf

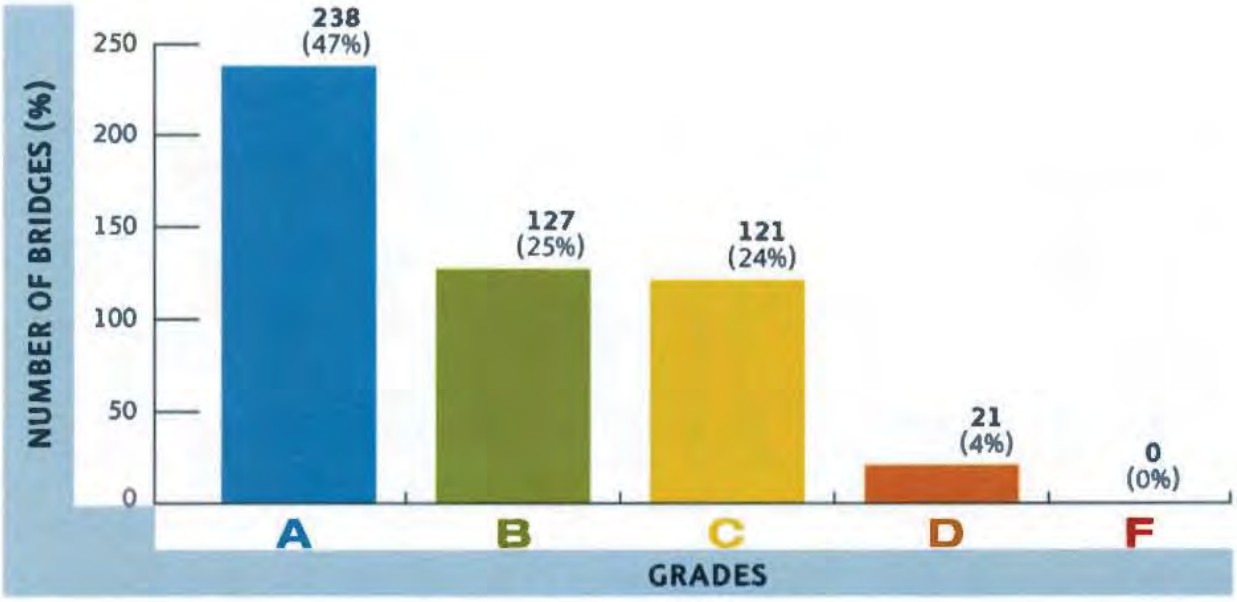
grades

BRIDGES

current grade: **C-**

recommended grade: **B**

GRADE	DESCRIPTION
A	Structure in very good condition and has operational capacity to meet the near future demand. No action required.
B	Structure in good to fair condition and meets current operation needs. Minor repairs needed for continuous usage.
C	Structure in fair to poor condition and can operate with continuous significant upgrade.
D	Structure in very poor condition and does not meet operational needs without significant upgrade. Continuous and major upgrades are necessary.
F	Structurally inadequate and fails to meet current operational needs, public accessibility and safety. Structure needs to be replaced for cost-effective solution. Requires immediate action.



recommendations

In January 2003, the Mayor and City Council adopted a policy for bridges under Council File 01-2715. As detailed in the 2003 City's Blue Ribbon Task Force Report, the Bureau of Engineering recommended improving the overall bridge system through strengthening, widening and/or reconstruction of the 83 identified substandard bridges in order to comply with this Council policy. Since 2003, 24 bridge projects have been completed at a cost of $57.2 million. The Bureau of Engineering recommends continuing with the 2003 Blue Ribbon Task Force Report recommendation by completing the remaining 59 bridge projects by 2020. The bridge system grade will improve from C- to B by completing these remaining bridge projects.

The 59 bridge projects consist of 35 active projects that are in various stages of design and construction and 24 on-hold bridge projects that require local matching funds in order to secure federal funding for design and construction. The 10-Year Capital Improvement Program for the remaining 59 bridges is estimated at a total cost of $965.9 million. Funding of $443.4 million has been secured through various sources with an additional $302.5 million to be identified and secured to complete the Capital Improvement Program. Additionally, annual funding of $1.0 million is needed for bridge-routine inspection and maintenance. A summary of funding needed to improve the Bridge infrastructure is shown in the table below.

BRIDGES
10-YEAR CAPITAL EXPENDITURE AND FUNDING PLAN

	TOTAL COST $ in Millions	SECURED FUNDING $ in Millions	FUNDING NEEDED $ in Millions
CAPITAL IMPROVEMENTS			
35 Active Projects	674.1	663.4	10.7
Caltrans/FHWA (HBP)		529.9	
Prop G, C, CIEP (City Match)		102.1	
LSSRP (State Match)		31.4	
24 On-hold Projects[1]	291.8[1]	0.0[1]	291.8[1]
Caltrans/FHWA (HBP)		0.0[1]	
Inspection & Maintenance	10.0	0.0	10.0
GF or Gas Tax (B&T Fund)		0.0	
TOTAL EXPENDITURES	**975.9[2]**	**663.4**	**312.5**

Legend:

HBP – Highway Bridge Program

CIEP – Capital Improvement Expenditure Program

LSSRP – Local Seismic Safety Retrofit Program

B&T Fund – Bridge & Tunnel Maintenance Fund

Footnote:

1 Local-match funds of $33.8 million is required to secure $258.0 million of Federal funds. Total of $291.8 million, made up of local-match and Federal funds are required for the 24 On-hold Projects.

2 Totals include, Inspection & Maintenance item of $10.0 million.

FLOOD CONTROL

overview

The flood-control system in the City of Los Angeles consists of more than 1,000 miles of storm drain pipes, open channels, and other significant elements to protect residents and property from flood damage. The Bureau of Sanitation acts as the owner of the City's flood control system and is responsible for the financial management, operation, and maintenance. The Bureau of Engineering's Street Improvement and Stormwater Division is responsible for engineering support and for implementing capital improvement projects for the stormwater program. The overall flood control responsibility within the City's jurisdiction is shared with the Los Angeles County Department of Public Works, United States Army Corps of Engineers (Army Corps), and California Department of Transportation. Each agency exercises jurisdiction over the flood control facilities they own and operate.

The local and regional flood control systems have been built and upgraded through federal and state legislation and county bond measures from the early 1900s through 1970. The larger capital flood control projects within the City of Los Angeles and regional projects were constructed by the County of Los Angeles. The City typically constructed smaller capital projects (project value < $1M). However, since about 2003, very minimal capital flood control expenditures have been made, with only about $1M spent annually for emergency storm drain repairs. The Bureau of Sanitation continually investigates drainage complaints and maintains a tracking and project prioritization system. There are currently more than 400 potential flood control capital improvement projects in the system.

The 2003 City's Blue Ribbon Task Force Report recommended various steps to secure construction funding and a goal of constructing 8.2 miles of new storm drains annually over the next 10 years. This goal was never implemented due to lack of funding.

description

The flood control system is designed to protect residents and property from flood damage. Along with more than 1,000 miles of storm drain pipes, there are 35 miles of open channels, 39,388 catch basins,

3,374 culverts, 1,078 low flow drains, 162 debris basins, and 18 stormwater pumping plants. Pipes vary in size, shape, and material and range in age from 20 to 100 years. The majority of the system consists of reinforced concrete pipes or structures with approximately 30 miles of corrugated metal pipe that is mainly used in the hillsides and in limited access areas.

Within the City of Los Angeles, there are four primary watersheds: the Los Angeles River, the Santa Monica Bay, the Ballona Creek, and the Dominquez Channel. Stormwater runoff from these watersheds directly discharges to the ocean or other agencies' flood control systems within the City prior to discharging to the ocean.

The Bureau of Engineering receives an average of 200 drainage complaints annually. Drainage complaints are all documented and include a field investigation and recommend mitigation measures as appropriate. Drainage complaints due to ponding water, clogged drains, or those that are otherwise maintenance-related are referred to the Bureau of Street Services and the Bureau of Sanitation. Complaints that identify significant drainage deficiencies result in proposed capital improvement projects, and the Bureau of Engineering has identified more than 400 capital improvement projects throughout the City that are necessary to address the drainage deficiencies within the City. This translates into about 170 miles of new storm drains throughout the City.

To support a more efficient approach to mapping and studying the flood control system, the Bureau of Engineering, between 2004 and 2008 digitized the flood control infrastructure information contained on the paper "Drainage Maps" into our Geographic Information Systems. The flood control Geographic Information Systems is a tool used to assist with the system inventory, condition assessment, and capacity modeling. The Bureau of Engineering is responsible for maintaining the stormwater infrastructure inventory while the Bureau of Sanitation manages the records and is responsible for the operation and maintenance of the system.

assessment

A comprehensive condition assessment of the flood control system has never been done. In 2006, the first Basic Condition Assessment Program for flood control infrastructure was completed. System capacity was not addressed in this assessment. Under this 2006 condition assessment effort, a representative sample of flood-control assets was chosen for physical inspection, including 54 miles of storm drain

pipes, 7 miles of open channel, 1,716 catch basins, nine stormwater pumping plants, 10 debris basins, and 18 low flow drains. The selections represented the City's diverse geography, terrain, soil type, land use, asset size, material and cross sectional shape.

Based on the physical condition of the samples, grades were assigned from A to F. Using regression analysis techniques, the assessment data of sample assets was used to predict the condition of assets that were not inspected. Several potential predictor variables were identified initially to model the asset condition. A mathematical model was developed that is capable of making conclusions regarding the condition of all assets based on sample assessment results.

In summary, 990 miles of the City's storm drain pipes have a grade of A, while 10 miles of the City's storm drain pipes have a grade of B. The 30 miles of corrugated metal pipe that have exceeded their service life are considered to have a grade of F. A grade of F is also given to the 170 miles of pipe identified in the 400 proposed capital improvement projects. Based on this assessment, the City's overall flood-control system has a current grade of B-.

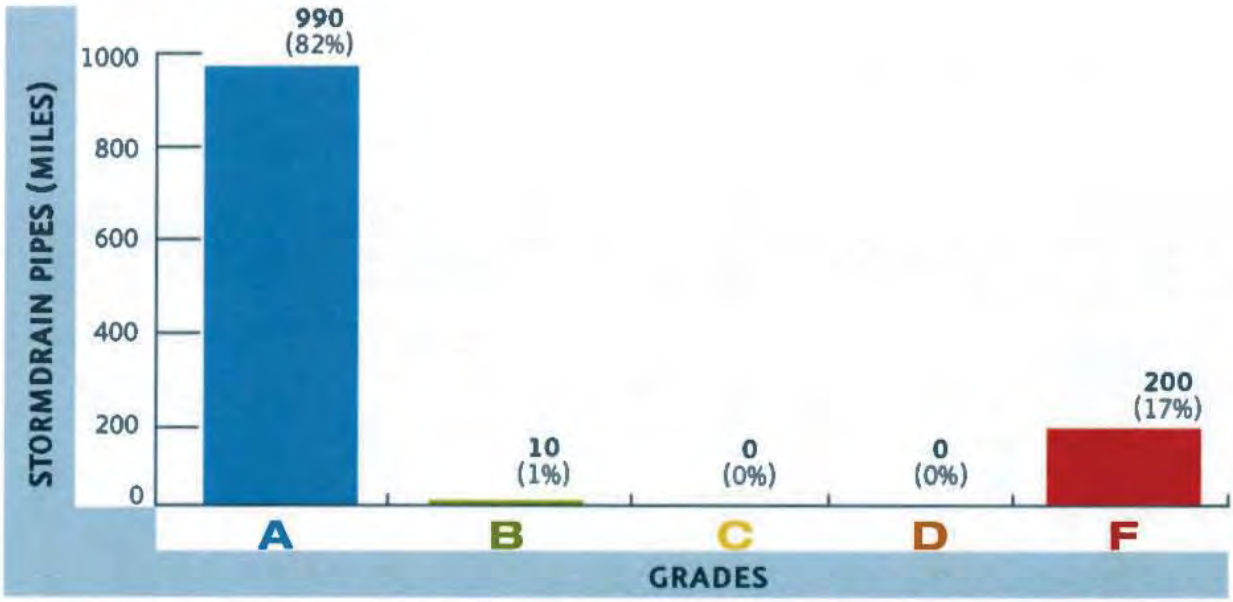
grades

FLOOD CONTROL

current grade: **B-**

recommended grade: **B**

GRADE	DESCRIPTION
A	Flood-control system is in very good condition and may be inspected as part of the regular inspection program. No repairs required.
B	Flood-control system is in good condition and may be inspected as part of the regular inspection program. Repairs may be required.
C	Flood-control system is in fair condition and will be inspected as part of the regular inspection program. Repairs will be required.
D	Flood-control system is in poor condition and will be considered for replacement, rehabilitation, and frequent inspection. Repairs will be required.
F	Flood-control system is in bad condition and will be scheduled for immediate replacement or rehabilitation. Immediate repairs or replacement is needed.



recommendations

The goal is to maintain a Grade B or better for the flood-control system. The Bureau of Engineering recommends continuing with the 2003 City's Blue Ribbon Task Force Report recommendations. These recommendations are to take the necessary steps to secure funding and to pursue the following recommendations which will achieve a Grade B for the flood-control system:

1. Restructure the Stormwater Pollution Abatement Charge – The Stormwater Pollution Abatement Charge rate must be adjusted to provide additional funding for flood control to support an average annual capital improvement program of $20 million for 20 years.
2. Secure $100 million in funding to replace 30 miles of corrugated metal pipe. As discussed previously, Corrugated Metal Pipe causes the majority of the emergency repairs in the City. As the Corrugated Metal Pipe systems are replaced, the annual funds spent on emergency stormwater repairs will decline.
3. Secure $200 million in capital funding for the Bureau of Sanitation to construct 50 miles of priority storm drain systems to mitigate local flood hazards. Priority is given to those flood-control projects near major streets and critical facilities, areas of repeated flooding and flood damage, and areas of repeated traffic accidents, with the highest priority for multiple impacts.

A summary of the funding needed to improve the Flood Control infrastructure is as follows:

FLOOD CONTROL
CAPITAL IMPROVEMENT EXPENDITURE AND FUNDING PLAN

EXPENDITURE	TOTAL COST $ in Millions	SECURED FUNDING $ in Millions	FUNDING SOURCE
Replace 30 miles of Corrugated Metal Pipe in 10 years	$100	$0	TBD
Construct 50 miles of Storm Drain systems in 20 years	$200	$0	TBD
Emergency Repairs	$1 (ANNUALLY)	ABOUT $1 (ANNUALLY)	SPAF

SIDEWALKS

overview

Unlike other infrastructure, Los Angeles' 10,750 miles of public sidewalks are unique because California law (Streets and Highways Code, Section 5610) establishes the primary responsibility for maintenance with the property owner adjacent to the sidewalk. If a sidewalk is damaged by a public street tree, the City shares that maintenance responsibility per Los Angeles Municipal Code Section 62.104. Regarding parkway planting adjacent to the public sidewalk, Los Angeles Municipal Code 62.168 specifies the adjacent property owner as responsible for maintaining and preventing parkway plants from becoming "dead, liable to fall, dangerous, or an obstruction to public travel."

There also exist sidewalk and parkway-plant installations which are nonstandard and are the express responsibility of the adjacent property owner. These installations require special liability insurance, a maintenance plan, and special permission from the Board of Public Works which includes, but is not limited to, the use of nonstandard materials, and plants, etc.

Since State law dictates that the individual property owners have the primary responsibility for the maintenance of the sidewalks, the Department of Public Works is not funded to manage a sidewalk program or maintain a comprehensive database for sidewalks, and sidewalks were not included in the 2003 Blue Ribbon Task Force Report.

description

The City's current inventory is approximately 10,750 miles of sidewalks with a potential of 13,000 miles (twice the 6,500 miles length of public streets in the City). More specific information is not available for several reasons. The difference may be site-specific hardships that precluded sidewalk construction, subsequent zoning changes or simply lack of funds. A second reason is sidewalks are not the responsibility of any single entity but rather the responsibility of nearly a million individual property owners. It is only where a sidewalk is damaged by a public tree that the City has joint responsibility. Since the City does not have the sole responsibility for a comprehensive sidewalk program or the funding, there is no current effort to survey, inspect or monitor sidewalks. Any detailed information about specific sidewalks

and their condition rating is limited to localized areas that are part of a special grant program or a targeted initiative.

There have been several initiatives to help property owners with sidewalk maintenance including Improvement Bonds, Assessments, 50/50 Program and "Point of Sale" repairs. The first two initiatives have had inadequate voter support. Many property owners are unaware of their sidewalk maintenance responsibilities or have the mistaken belief that maintenance for the City's sidewalks is provided by property, income or sales taxes. These beliefs have been perpetuated given the City's lack of funds for active enforcement of sidewalk maintenance and reluctance to issue citations against property owners.

The 50/50 Program, which shares costs between the property owner and City, has been a huge success but lacks funds to continue. The Point of Sale requires any deferred sidewalk maintenance be addressed during property sales and is being discussed actively at this time.

assessment

For the reasons described, the lack of data does not support a composite grade verifiable by analysis. With limited surveys showing approximately 40% of the City's sidewalks in the "D" (Poor) and "F" (Very Poor) categories, a qualified estimate is that sidewalks have an overall grade of "D+."

grades

SIDEWALKS
current grade: D+
recommended grade: C+

GRADE	DESCRIPTION
A	Meets all current regulations. Satisfies anticipated usage for next three years. Only routine maintenance (cleaning, sweeping, parkway plants trimmed) needed within next three years.
B	Meets all current regulations. Satisfies anticipated usage for next three years. Exhibits light cracking requiring special maintenance (crack sealing) within next three years to sustain rating.
C	Meets regulations at time of original construction. Satisfies Americans with Disabilities Act access requirements. May not satisfy anticipated usage for next three years. Exhibits moderate cracking, wear and offsets requiring special maintenance (grinding, crack sealing) within next three years to preclude accelerated deterioration.
D	May require Americans with Disabilities Act access retrofit. May not satisfy anticipated usage for next three years. Exhibits heavy cracking, wear and offsets requiring repairs (limited replacement, grinding, root pruning, etching, asphalt patching) within next three years to sustain rating.
F	May require Americans with Disabilities Act access retrofit. May not satisfy anticipated usage for next three years. Exhibits heavy cracking, wear, offsets and instability. Repairs are no longer effective, only allowing temporary usage.

recommendations

- Educate the public regarding its responsibilities per State law and their civic duty for maintaining sidewalks.
- Request City funding to develop a comprehensive sidewalk inventory that would document such issues as current conditions, compliance with regulations, estimated cost for repairs, compatibility with usage and pedestrian volume, and the priority.
- Continue to pursue alternative means to fund sidewalk projects, such as grants, special programs, voter indebtedness, 50/50, and the Point of Sale.
- Target an overall grade of C+.

SOLID RESOURCES

overview

The Bureau of Sanitation is responsible for the safe and efficient collection, recycling, and disposal of solid resources generated within the City of Los Angeles. The Bureau of Sanitation has been providing solid waste management services to single-family residences since 1890. Solid waste management has evolved from its early separation of wastes into three streams in the 1900s, to relying on a single waste stream collection by private haulers in the 1950s, to the introduction of sanitary landfills in the 1970s, to the consideration of waste-to-energy programs in the 1980s, to the reintroduction of traditional recycling in the 1990s, and finally to the current state-of-the-art programs and facilities focusing on increasing landfill diversion. By 2001, the Bureau of Sanitation achieved a diversion rate of 62 percent through the implementation of various source reduction, recycling, and other programs, and reached 65 percent in 2008. Currently, the Bureau of Sanitation aims to achieve a landfill diversion goal of 70 percent by 2013.

Solid Resources was one of the infrastructure elements addressed in the 2003 City's Blue Ribbon Task Force Report. Some of the recommended projects have been implemented. Liquefied Natural Gas/Compressed Natural Gas (L/CNG) fueling facilities were constructed at the collection yards in East Valley, West Valley, South Los Angeles, and Harbor. The truck-wash facility at the West Valley yard was upgraded. To date, 391 collection vehicles have been converted to clean fuel (i.e., L/CNG), and final closure of the Toyon landfill was completed. The remaining projects proposed by the City's Blue Ribbon Task Force report have not been completed due to budgetary and regulatory constraints. These projects have been incorporated in the current five-year Solid Resources Capital Improvement Program. The Solid Resources Capital Improvement Program provides direction and guidance for the Solid Resources Program in planning and managing its infrastructure assets for a period of five years.

The implementation of the five-year Solid Resources Capital Improvement Program will require an investment of about $105 million. Of the total investment needed, $19 million is required for the existing projects (of which only $12 million has been secured) and $86 million for the proposed projects. Funding will have to be secured through a combination of sources including bond issuance, Solid Waste Resources Revenue Fund and other special revenue funds, as well as federal, state and local grants.

description

The City of Los Angeles is home to more than four million people in more than 468 square miles. A total of 10.4 million tons of Municipal Solid Waste is generated per year from both residential and commercial sectors. Residential waste is collected by the Bureau of Sanitation, and commercial waste is handled by private haulers.

The Bureau of Sanitation provides a three-stream weekly curbside-collection service for recyclables, yard trimmings, and refuse, utilizing a fleet of about 770 vehicles collecting residential solid resources from six waste sheds: East Valley, West Valley, South Los Angeles, North Central, West Los Angeles, and Harbor. Each waste shed has a collection yard that provides office and parking spaces for operational staff as well as facilities for fueling and washing collection trucks.

The recyclables are taken to Material Recovery Facilities for beneficial reuse, while yard trimmings are sent to both City-owned and contracted green-waste processing facilities for composting. The refuse is hauled to contracted landfills as the Bureau of Sanitation no longer operates active landfills.

The Bureau of Sanitation also operates the Central Los Angeles Recycling and Transfer Station where a large portion of the refuse is transferred for consolidation into high-volume trucks for more economical shipment to landfill sites. In addition, the Bureau of Sanitation operates six Solvents, Automotive, Flammable and Electronics centers for the collection of household hazardous waste and electronic waste.

In summary, the Bureau of Sanitation currently manages Solid Resources infrastructure consisting of six collection yards, one transfer station, two green-waste processing facilities, one composting facility, six closed landfills, six Solvents, Automotive, Flammable and Electronics centers, four L/CNG fueling stations, and three truck wash facilities. This report contains the assessment of each facility and makes recommendations for how each facility can be improved to meet the anticipated demands placed on the Bureau of Sanitation's Solid Resources Program. In addition, the report discusses the investment needs for implementing the recommended improvements.

assessment

The Solid Resources infrastructure is assessed every two years to evaluate the current condition, performance, capacity, and demands of the infrastructure assets, such as structure and equipment. The assessment method involves interviewing key site personnel and reviewing existing facility records, including drawings, maps, site surveys, equipment service logs, and various solid waste generation reports.

For assessment purposes, the Solid Resources infrastructure is divided into seven categories: 1) Collection, 2) Transfer, 3) Recycling/Processing, 4) Disposal, 5) Special Waste Handling, 6) L/CNG Fueling, and 7) Truck Washing. Grades for each category were assigned based on the American Society of Civil Engineers 2009 standards. The grading was on a scale of "A" (4) to "F" (0), with "A" for a facility in very good condition and "F" for a facility inadequate to meet current and future needs. Facilities whose condition could not be observed were given a grade of "Not Rated."

grades

SOLID RESOURCES

current grade: B-

recommended grade: B+

GRADE	DESCRIPTION
A	Solid Resources facility is in very good physical condition. Meets current capacity needs and future capacity needs for the next three years. Meets all regulatory requirements. No action is required.
B	Solid Resources facility is in good to fair physical condition. Meets current capacity needs. Minor improvements/repairs needed for continuous operation.
C	Solid Resources facility is in fair to poor physical condition. Meets current capacity needs. Routine repairs needed for continuous operation.
D	Solid Resources facility is in poor physical condition. Meets current capacity needs. Significant repairs needed for continuous operation.
F	Solid Resources facility is inadequate and fails to meet current operational needs. Facility needs to be replaced. Requires immediate action.
Not Rated	The condition of the Solid Resources facility could not be observed.

recommendations

The Bureau of Sanitation has developed a 5-year Solid Resources Capital Improvement Program that will make the necessary improvements to various existing facilities over the next five years (Fiscal Years 2010-2011 through 2014-2015). The Solid Resources Capital Improvement Program expenditure plan is developed for a period of five years and is updated every year.

The implementation of the Solid Resources Capital Improvement Program will address capacity needs and structural deficiencies, comply with regulatory requirements, meet current health and safety standards, and improve operational efficiency of the Solid Resources infrastructure. The proposed projects will improve the infrastructure grade from "B-" to "B+" as well as implement repair and maintenance work to keep the current service level of the facilities.

The 5-year Solid Resources Capital Improvement Program consists of 24 capital improvement projects and one repair/maintenance project. There are eight existing projects in various stages of design and

construction and 17 proposed projects. A total capital investment need of approximately $105 million is required to plan, design, and construct these projects over the next five years. Of the total investment need, $19 million is required for the existing projects and $86 million for the proposed projects. For the existing projects, funding in the amount of $12 million has been secured and an additional $7 million will have to be identified. To implement all the projects in the 5-year Solid Resources Capital Improvement Program, a total funding of $93 million needs to be secured through various funding sources. The table below summarizes the funding needed to repair, maintain, and improve the Solid Resources infrastructure.

SOLID RESOURCES
5-YEAR CAPITAL EXPENDITURE AND FUNDING PLAN

	TOTAL COST $ in Millions	SECURED FUNDING $ in Millions	FUNDING NEEDED $ in Millions
CAPITAL IMPROVEMENTS			
24 Active Projects	103.63	12.13	91.50
Fund 45T		2.70	
Fund 46T		0.40	
Fund 47D		1.00	
Fund 48S		0.78	
Fund 49G		5.28	
Fund 509		0.19	
Fund 556		1.77	
Repair & Maintenance	1.50	0.00	1.50
Fund 556	1.50	0.00	1.50
TOTAL EXPENDITURES	**105.13**	**12.13**	**93.00**

STREETS

overview

The Bureau of Street Services is responsible for the maintenance of approximately 6,500 centerline miles (28,000 lane miles) of roadway and 800 miles of alley within the City of Los Angeles. This report specifically addresses only the pavement aspect of streets. (Note that other facets, such as traffic and street reconstruction, are the responsibility of other City agencies.)

The Bureau of Street Services manages a systematic and objective pavement preservation program. The goal of the program is to maintain and enhance the physical environment while promoting a safe and secure pavement system for the community. Due to limited funding, the current focus is on preserving as many streets as possible before the point where reconstruction, which costs three to five times more than preservation, is necessary. A policy of relying solely on maintenance, instead of improving street condition, has been adopted until adequate funding is available for improvement.

Prior to World War II, the City had approximately 2,500 miles of paved streets. The Annual Resurfacing Program consisted of about 50 miles. After World War II, with expansion into the San Fernando Valley, the City street system grew to the current 6,500 miles. Until about 1986, the annual resurfacing program remained at 50 miles. In 1973, the Bureau of Street Services implemented the Slurry Seal Program to preserve and extend the life of selected local streets.

The 2003 City's Blue Ribbon Task Force Report recommended reconstruction of 1,000 miles of failed local streets through a Street Capital Improvement Plan to be funded by modified local and state funds and by a proposed $387.8 million bond. In addition, a maintenance program was recommended. Due to funding shortfalls, only 155 miles of local streets were reconstructed and only 985 miles of streets have been resurfaced from the beginning of Fiscal Year 2003-2004 through October 2009. In addition, 1,984 miles of slurry seal have been applied to local streets during this period.

Currently, the 2009 estimated cost to reconstruct 1,000 miles of failed local streets is approximately $650 million, close to twice the 2003 amount.

During the past decade, maintenance and preservation of streets has been continually under-funded. The average annual budget for select and local streets has been approximately $59 million, compared to the $254 million recommended. These funding limitations have placed the average condition of the street system at a fair condition, and if the current budget levels continue, the street network will worsen to a poor condition. This has resulted in a current $1.92 billion backlog of poor to very poor condition streets that require correction.

description

In addition to being the largest municipal street system in the nation, it is also the most congested. The 6,500 miles of improved streets are divided into two geographic areas: the Metropolitan area (53%) and the San Fernando Valley (47%).

The street system is divided into four functional classifications: primary arterials, secondary arterials, collector streets, and local streets. The first three classifications are considered "non-residential" streets and are primarily throughways that connect distant locations. This group of streets represents approximately 2,600 miles of the street network and usually, these are wide streets (between 45 feet and 100 feet) that carry heavy volumes of traffic. Primary, secondary, and collector streets are designed and constructed with thicker layers of asphalt to last approximately 15 to 20 years before resurfacing is necessary.

Local "residential" roadways represent approximately 3,900 miles of the street system and their width varies between 15 feet and 45 feet. They carry local and light traffic but are sporadically exposed to heavy traffic such as refuse collection trucks, buses, and/or construction trucks. The Bureau of Street Services expects this class of roads to last between 30 to 35 years before resurfacing is necessary.

The street system may also be classified by surface type. Two types of surfaces are typically found in City streets: asphalt concrete and Portland cement concrete. Approximately 5,840 miles of the street network are asphalt concrete, while 493 miles are Portland cement concrete. Other types combined represent 107 miles of the street system. Streets are repaired and improved through a variety of funding sources, including Gas Tax, Proposition C, Traffic Safety, and the General Fund.

assessment

To monitor, maintain, and manage this street infrastructure, pavement condition levels are determined by using the internationally accepted Pavement Condition Index (PCI – ASTM standard D6433-99). This scale rates the physical condition of the street considering the pavement's structural integrity and surface operational condition. This numerical rating index ranges from 0 for a failed pavement to 100 for a pavement in perfect condition.

The Bureau of Street Services uses MicroPAVER which is a Pavement Management System that not only provides a systematic and consistent method for assessing maintenance and rehabilitation but also determines the optimal time for repair by predicting future pavement condition. The Pavement Condition Index scores are subsequently grouped into letter grades, "A" to "F" with "A" representing the streets in good condition and "F" representing the streets in very poor condition.

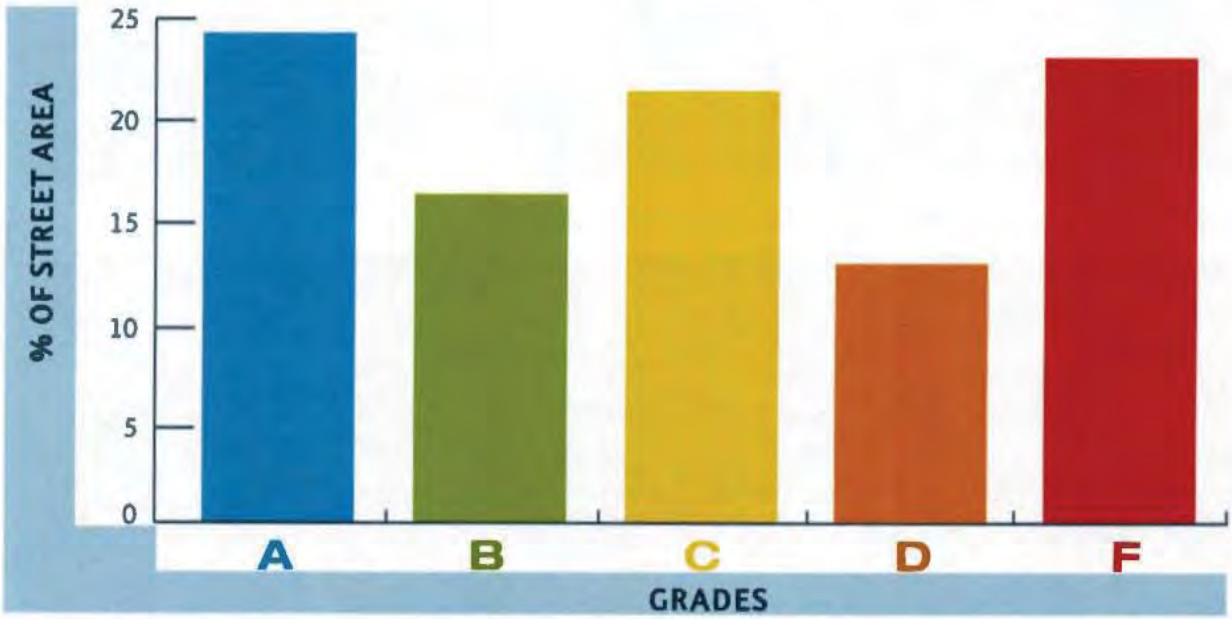
The current plan is to survey one-third of the entire street system every year and complete the survey of all City streets within three years. This is accomplished using a semi-automated van to collect pavement distress data. This van is equipped with a computerized work station, cameras to take digital images of the street surface, and lasers to capture roadway roughness and rutting data.

grades

STREETS
current grade: C
recommended grade: B

The 2008 street network average weighted PCI is 62 which equals the 2005 Pavement Condition Index. This outcome is largely due to the slurry-seal maintenance program on residential streets. The Street Infrastructure Condition Assessment of the non-residential network (primary, secondary, and collector streets) indicates a weighted average condition level of "C+" while the residential network (local streets) has a weighted average condition level of "C-." Additionally, it was determined that the combined weighted average condition level of the overall street system is a "C."

GRADE	DESCRIPTION
A	Pavement Condition Index Range is between 86 and 100. Pavement is in good condition and exhibits no cracking, no oxidation and no base failure. No action is required.
B	Pavement Condition Index Range is between 71 and 85. Pavement is in satisfactory condition and exhibits minimal cracking, no oxidation and no base failure. Slurry seal of local street pavements required.
C	Pavement Condition Index Range is between 56 and 70. Pavement is in fair condition and exhibits minimal cracking, 0% to 5% base failure. Maintenance Overlay of 1 ½" to 2" of asphalt concrete required.
D	Pavement Condition Index Range is between 41 and 55. Pavement is in poor condition and exhibits moderate cracking, 6% to 35% base failure. Resurfacing of 2" to 2 ½" of asphalt concrete required.
F	Pavement Condition Index Range is between 0 and 40. Pavement is in very poor condition and exhibits major or unsafe cracking, 36% to over 50% base failure. Resurfacing or Reconstruction of 6" to 12" of asphalt concrete required.



recommendations

In order to maintain the City street system in a satisfactory condition of a "B" or Pavement Condition Index 80, the majority of streets must exhibit no structural failure. The City must allocate $285 million per year for the next 10 years in order to eliminate the current maintenance and rehabilitation backlog of $1.92 billion. So, the choice is to spend $1.92 billion to eliminate the current backlog or spend $2.85 billion over 10 years.

For reconstruction of local streets, since 2003, only 155 miles of the 1,000 miles recommended have been completed. Also, the recommended funding level of $387.8 million in the 2003 City's Blue Ribbon Task Force Report is now an insufficient amount to reconstruct 1,000 miles of failed streets and the current cost to do this work is $650 million. The 2003 recommendation specifically addressed reconstruction of local streets. However, in order to achieve a Grade "B" or Pavement Condition Index of 80, all streets in the network should be considered.

Main - 28th to 29th, Pavement Condition Index 43, Grade D

Figueroa & 48th, Pavement Condition Index 57, Grade C-

Acknowledging the current economic outlook, minimally, the recommendations discussed above and the actions discussed below are recommended:

- Establishing and funding a baseline pavement preservation program annually that provides for 320 miles of major rehabilitation (resurface and reconstruction) and 400 miles of preventive maintenance (crack and slurry seal). This is the minimum required to maintain the street system in its current condition for the next ten years.
- Allowing the Bureau of Street Services to modify the budget allocation formula as needed. This formula allows for the equalization of pavement conditions Citywide. As a result, all neighborhoods in the City would have streets with similar pavement conditions.

A summary of the funding needed to improve the pavement infrastructure from a "C" to a "B" is:

STREETS 10-YEAR CAPITAL IMPROVEMENT PROGRAM

EXPENDITURE	TOTAL COST $ in Millions	SECURED FUNDING $ in Millions 2009/2010 Base Budget	FUNDING NEEDED $ in Millions	FUNDING SOURCE
Resurfacing Program	2,540	400	2,140	Gas Tax & Prop. C
Maintenance and Slurry Program	310	156	154	Gas Tax & Traffic Safety
TOTAL EXPENDITURE	**2,850**	**556**	**2,294**	**Gas Tax, Prop. C & Traffic Safety**

Figueroa - 42nd to 43rd, Pavement Condition 100, Grade A

STREET LIGHTING

overview

The Bureau of Street Lighting is responsible for the design, construction, operation, maintenance, and repair of the street lighting system, and manages more than 200,000 street lights in the City of Los Angeles. Street lighting is a very important part of the infrastructure of a city. It provides a safer environment for vehicular and pedestrian traffic during night-time hours, helps a community's aesthetics and identity, is a deterrent to criminal activity, and improves the overall quality of life.

The City's history of street lighting dates back to 1867 when a contract for lighting the streets by gas was granted by the City of Los Angeles Gas Company. Only a few units were ever installed. By 1882, when street lighting by electricity was finally authorized, there were 136 lamps operated by gas. Arrangements were made in 1890 with the Los Angeles Electric Company and the San Gabriel Electric Company to install electric lines and fixtures and supply energy and maintenance. In 1905, Broadway, south of First Street, was lit by the City's first incandescent, ornamental, electrical street-lighting system.

Funding for street lighting infrastructure comes from the Street Lighting Maintenance Assessment Fund that covers the operation and maintenance costs of the street lighting system. This revenue has been frozen with the passage of Proposition 218 in 1996, which hampers the City's ability to adjust the Street Lighting Maintenance Assessment Fund to correspond with the inflation index without directly going to the voters for that authority. Although the funds have been frozen, the operation costs of the street lighting infrastructure have continued to increase. This has led to a projected future deficit for the continued operation and maintenance of this system.

The 2003 City's Blue Ribbon Task Force Report recommends a comprehensive street lighting reconstruction and maintenance plan that involves reconstructing 70,816 street lights over a period of 10 years. Due to the shortage in funding, only a fraction of street lights have been restored.

description

The City's 200,000 streetlights also consist of nearly 400 different styles of poles, ranging from modern to ornamental. These lights provide illumination for about 70% of the City. The street lighting system infrastructure includes streetlight poles, luminaries and lamps, foundations, conduits, and the electrical system. The majority of the street lighting system in the City of Los Angeles has underground wiring.

The Bureau of Street Lighting has identified two areas that are in desperate need of outside funding which are vital to the preservation of the City's street lighting system and directly impact the safety of vehicular and pedestrian traffic. These include 1) replacing 140,000 existing streetlight fixtures with energy-efficient LED units in order to save energy and 2) repairing streetlights that are in poor condition and need rehabilitation or replacement.

In 2009, The Bureau of Street Lighting started to replace the 140,000 existing streetlight fixtures with LED units. These replacements will be completed with City forces. The LED program will cost $57 million but can generate savings in energy and maintenance costs that will pay for the estimated loan amount of $40 million in seven years, with no adverse impact to the General Fund. This program will realize a total savings of $48 million over a seven-year period, including $35 million in energy and $13 million in maintenance savings. After debt service is retired in year seven, the City will realize savings of $10 million annually from this program. These savings will allow the City to continue to operate the City's street lighting system, since the current revenue is frozen and is annually incurring increases in expenditures.

Currently, 18% (37,027) streetlights are in desperate need of replacement. The streetlights are approximately 90 years old with underground systems that are continuously failing. This 18% accounts for 80% of the streetlights out. This area is in vital need of funding.

assessment

A street lighting system's life span is estimated at approximately 60 years. At this point, the pole, conduit, and foundation begin to erode, causing light outages and maintenance problems.

System age and light source (lamp type) are the basis for the street lighting assessment used in this Report. Categorizing the street lighting system by age and light source provides a direct relationship to

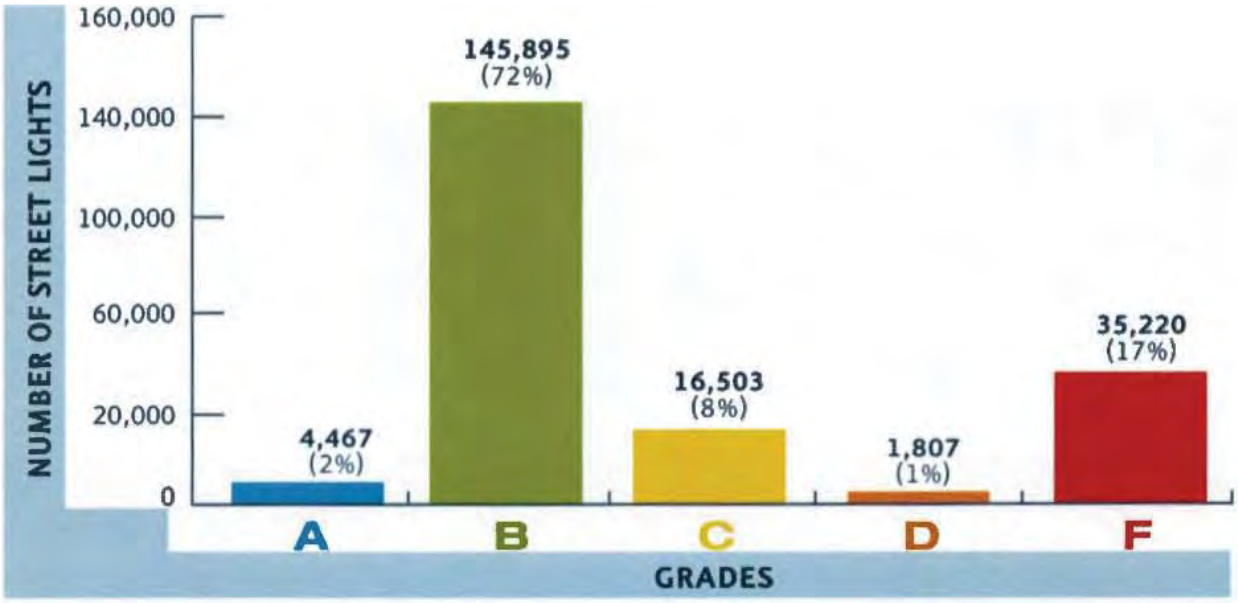
other factors such as energy efficiency, maintenance needs, and safety. This assessment methodology is used to establish the current overall street lighting system grade of C+.

The existing street lighting system has been evaluated every 10 years, using evaluation criteria based on age, maintainability, and energy efficiency.

grades

STREET LIGHTING
current grade: C
recommended grade: B

GRADE	DESCRIPTION
A	Not in need of energy efficiency upgrade. Safe and efficient multiple circuit. Maintainable and reliable. Less than 30 years old (LED and Induction).
B	Candidate for energy efficiency upgrade. Safe and efficient multiple circuit. Maintainable and reliable. Less than 45 years old (High Pressure Sodium and Fluorescent).
C	Candidate for energy efficiency upgrade. Safe and efficient multiple circuit. Maintainable and reliable. Streetlight is 46 – 59 years old (High Pressure Sodium and Fluorescent).
D	Candidate for energy efficiency upgrade and system rehabilitation. Multiple circuit. Over 60 years old (any light sources).
F	Major and continuous repairs required. Dangerous high voltage series circuits. System needs to be replaced.



recommendations

In the 2003 City's Blue Ribbon Task Force Report, it was recommended that the City's street lighting system be upgraded. The Bureau of Street Lighting has developed the LED program to save energy, as well as reduce maintenance in an effort to improve the City's infrastructure. The savings from the program will pay for the maintenance.

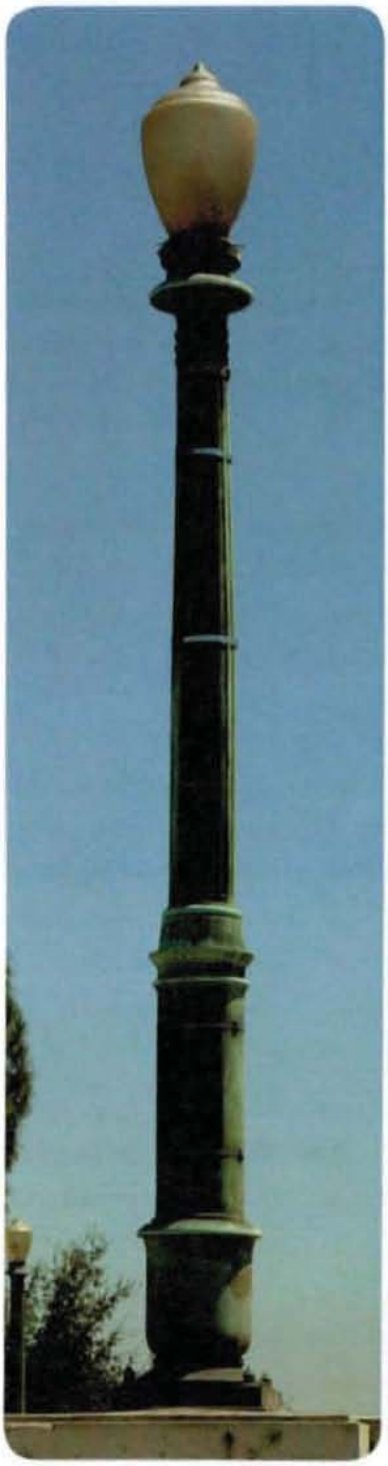
In addition to the LED program, the Bureau of Street Lighting also recommends replacing and rehabilitating its most unsafe, high maintenance, and inefficient units. A total of $370 million in additional funds are needed in the next 10 years to improve the overall condition rating of the City's street lighting system from a "C" to an "B". A summary of the funding needed to improve the street lighting infrastructure is shown in the table on the next page.

STREET LIGHTING 10-YEAR PROGRAM AND FUNDING PLAN

PROGRAM EXPENDITURES	TOTAL COST $ in Millions
High Maintenance High Voltage Conversion (Fixtures)	$370.0
Other	$0.0
TOTAL EXPENDITURES	**$370.0**

FUND SOURCE	
Street Lighting Maintenance Assessment Fund	$2.0
Other Funding	$2.0
Department of Water and Power Rebate	$2.0
Possible Other Sources: Gas Tax - CIEP, ARRA	$2.0
TOTAL FUNDING SOURCES	**$8.0**

TOTAL FUNDING REQUIRED	**$362.0**



STREET TREES

overview

The Bureau of Street Services manages more than 700,000 trees. Unlike many cities, the City includes its street tree population as a General Plan Framework infrastructure element. Although in theory, this allows for a better planned, maintained, and sustained element, maintaining high quality infrastructure requires continuing allocation of adequate maintenance resources.

Approximately 50 to 60 percent of the City's street trees were planted during the post-World War II building boom that continued through the late 1960s. Trees provide a myriad of benefits to the ecosystem including, but not limited to, reducing heat island effects, minimizing energy costs, soil erosion and stormwater runoff, increasing property values, carbon storage, and adjacent street pavement surface life. These quantifiable benefits vary throughout a tree's life.

Unlike other infrastructure, trees do not depreciate in a straight line. As trees mature, a point is reached where benefits to the ecosystem equal and exceed the costs of watering and care. It is at this point that the tree begins to appreciate in value. As trees continue to age, benefits to the ecosystem begin to diminish and costs exceed benefits.

description

The City has the world's largest municipal street-tree population which currently numbers more than 700,000 trees. The street trees are under the control of the Department of Public Works per Los Angeles Municipal Code Section 62.161-176. The street-tree population is largely a result of the City exercising its development discretionary powers and thereby requiring street trees.

The City's street tree population is comprised of an extremely diverse species base. There are more than 900 identified tree species. The genus and family base is also extremely diverse. However, due to the high volume of street tree planting during the post-World War II building boom, the age distribution is somewhat compacted.

assessment

The street tree infrastructure assessment is based on four factors: species diversification, age, planted area to vacant area ratio, and the health of the trees. The City developed a street tree database in the mid-1990s and the species diversification and tree planting assessment are based on the information in that inventory.

Arboriculture Best Management Practices require a healthy urban forest to be comprised of less than 10% of any one tree species, 20% of any one tree genus, and 30% of any one tree family. The City's highest 20 species in population are all separate species, genus, and family. No specie comprises more than seven percent of the population, and the genus and family distribution are well above the recommended 20% and 30% respectively. The City's species diversity rates an "A" grade.

Due to the large number of tree plantings in the 1950s and 1960s, many street trees are in the 50-year age range. Given the general health of most of these trees, the City may expect a continued 20-40 year period where benefits to the ecosystem exceed the costs for care. However, sometime in the next few decades, a large percentage of the street trees will be rapidly reaching senescence and diminishment or loss of their benefits to the ecosystem. Given this potential for a rapid decline in the street tree population, the age diversity rates a grade of "C."

The street tree inventory disclosed approximately 800,000 locations where trees could be planted with 680,000 actual tree plantings. It is estimated today that an additional 20,000 street trees have been planted. This equates to an approximately 87% planted to vacant ratio. Therefore the planted to vacant ratio grade earns a "B."

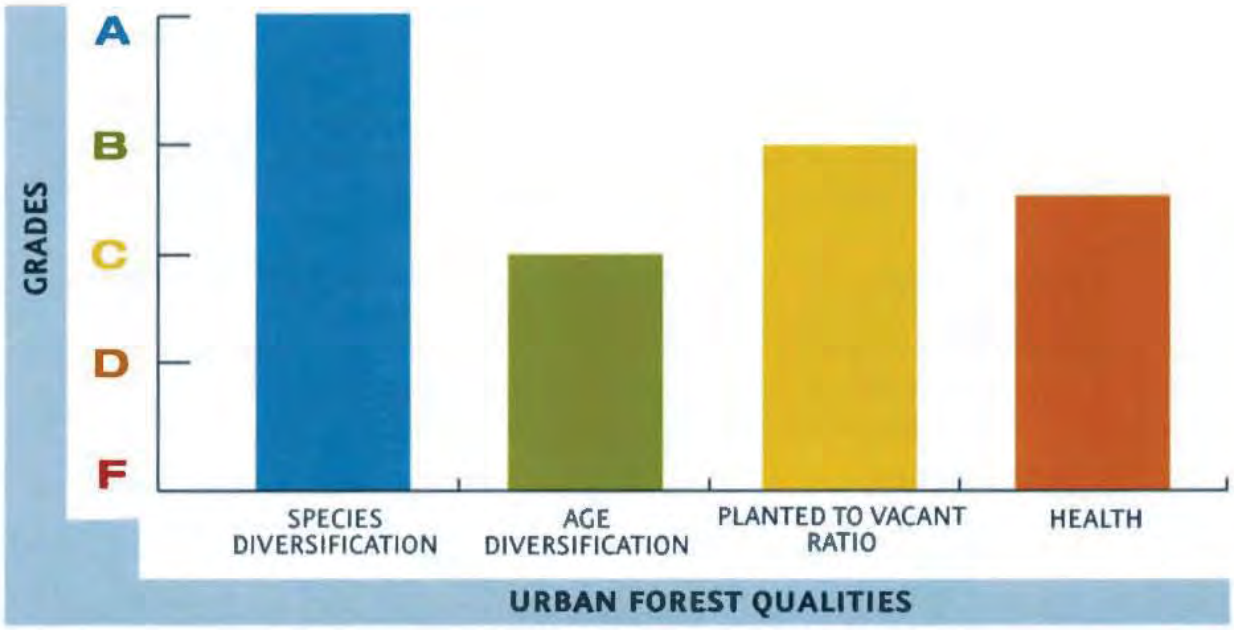
Due to the lack of funding, the health of the street trees can only be anecdotally assessed at this time. It is estimated that globally, the health of the City's street trees is a grade of "B-."

Therefore, the street trees overall grade is a C+.

grades

STREET TREES
current grade: C+
recommended grade: B

GRADE	DESCRIPTION
A	Street tree population is comprised of varied species and ages and in a very healthy condition. Ninety-five percent or greater of the available tree planting sites are planted. Street tree environmental services optimal and exceed costs.
B	Street tree population is comprised of varied species and ages and in a healthy condition. Ninety percent or greater of the available tree planting sites are planted. Increase in tree planting required. Street tree environmental services exceed costs.
C	Street tree population is comprised of varied species with half over-mature or senescent and poor to good health. Seventy-ninety percent of the available tree planting sites are planted. Tree removal and replacement program and increase in tree planting required. Street tree environmental services diminished and costs beginning to exceed benefits.
D	Street tree population is comprised of limited species with more than 50% over-mature or senescent and poor to good health. Fifty-ninety percent of the available tree planting sites are planted. Tree removal and replacement program and increase in tree planting and species diversification required. Street tree costs exceed ecosystem services.
F	Street tree population is comprised of only a few species with more than 50% over-mature or senescent and poor to good health. No new tree plantings. Majority of available tree planting sites contain dead/dying trees or are not planted. Tree removal and replacement program and increase in tree planting and species diversification required. Street tree costs greatly exceed benefits as ecosystem services reach minimal level.



recommendations

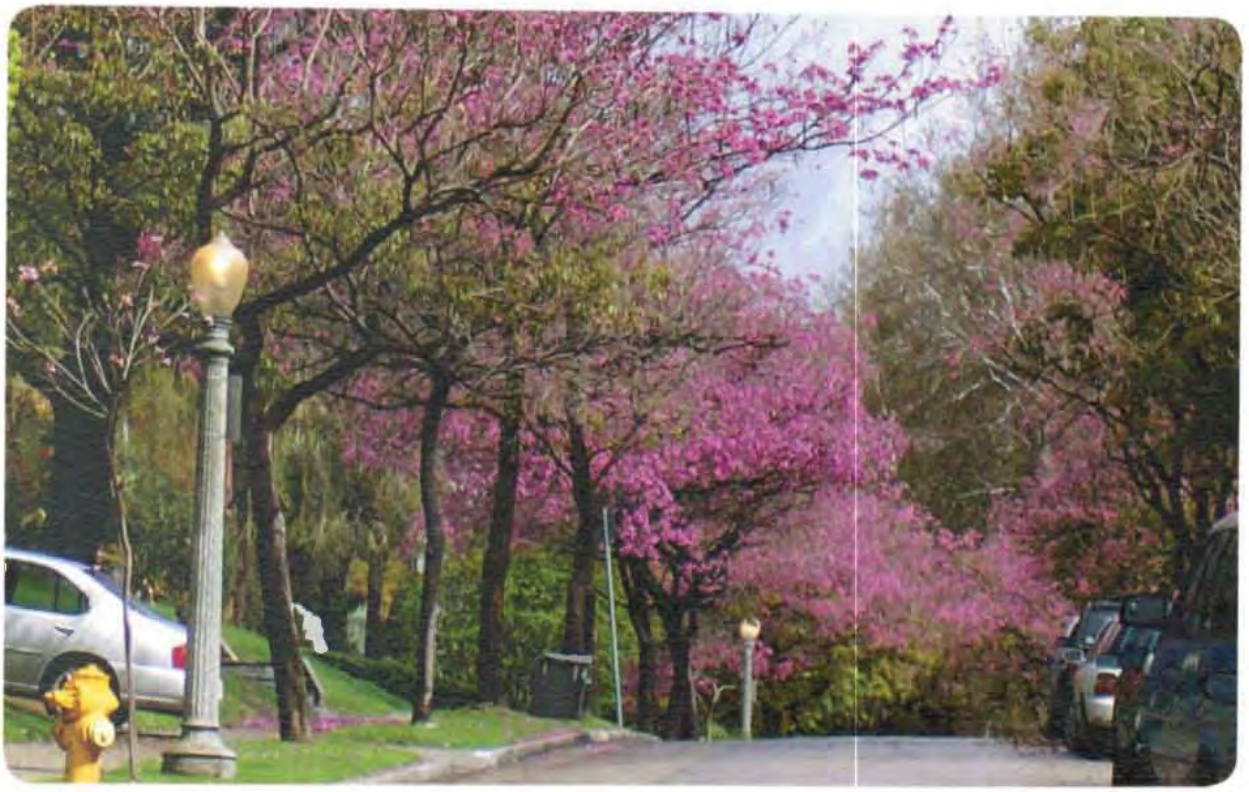
These recommendations are based on international and national "best practices" for urban forests.

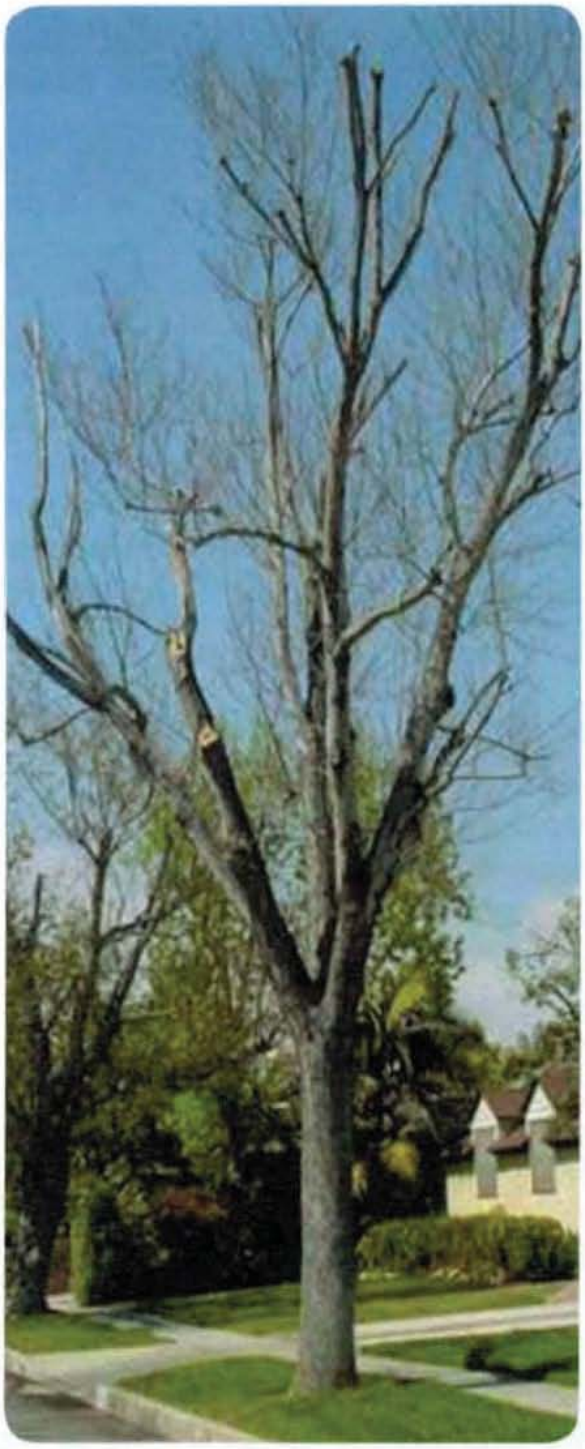
- Since the implementation of the Million Trees L. A. program, the City has seen a large increase in the number of street tree plantings. This program has heightened community awareness of the benefits of planting trees and also assisted in educating the community on how to maintain trees properly. The continuation of the Million Trees L. A. will improve the street-tree infrastructure significantly.

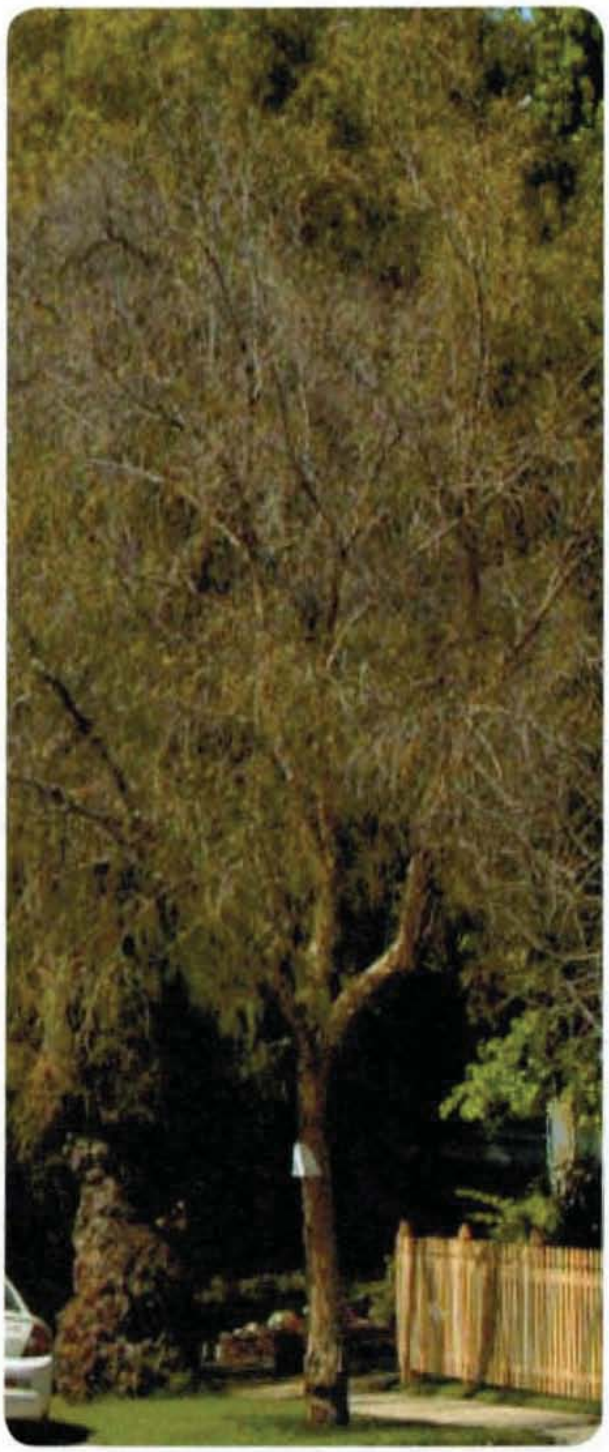
- A phased street tree removal program is recommended. This program would target areas of the City with long blocks of uniform species and aged tree plantings. Tree removals would begin with the removal of 10 to 15 percent of the existing trees and repeated every five to 10 years depending upon species. The tree removals would be immediately replaced with the uniform species unless the planting area of the street was not conducive to that species.

- Nearly all of the City's urban forest is a human construct and the street-tree population is entirely of that nature. Given the City's temperate climate, with adequate water, almost any tree can grow. The City must leverage the species availability while being mindful of a diminishing water supply.

- The City must take a more global view of the street-tree population and realize that street-tree sustainability can only be achieved by proactively removing and replacing trees, continuing the Mayor's Million Trees L.A. Program and investing more street-tree maintenance funding will ensure that these goals and street-tree health will continue in the future.







URBAN RUNOFF

overview

The Bureau of Sanitation has been charged with keeping the City in compliance with the mandates of the Federal Clean Water Act, as required in the City's Stormwater Permit. Every day urban runoff flows untreated through the City and picks up trash, oil, bacteria, fertilizers and pesticides, and toxics along the way. These eventually end up in the City's water bodies. The regulatory standards that must be met are referred to as Total Maximum Daily Loads. A Total Maximum Daily Load is a limit to the amount of a pollutant that a specific water body can receive from all sources (including urban runoff) and still meet water quality standards. With 14 Total Maximum Daily Loads currently in effect and more than 60 expected, the Bureau of Sanitation continues to assume a leadership role in protecting the quality of the City's waters.

In November 2004, with voter approval of $500 million for Proposition "O," efforts to comply with the first Total Maximum Daily Loads for trash and bacteria were seen throughout the City. With the installation of screens and inserts at catch basins and through the Bureau of Sanitation's eight Low Flow Diversions, the City has successfully met its interim compliance milestones for the trash and bacteria Total Maximum Daily Loads.

These projects provide a solid start on improving water quality. However, more Total Maximum Daily Loads will require more projects. Proposition O is a one-time funding source for specific projects. The Bureau of Sanitation's funding source for the Stormwater Program is the Stormwater Pollution Abatement Charge, which has not been increased since 1993 and is inadequate to provide for the flood control and pollution abatement needs of the City. With Total Maximum Daily Loads being promulgated faster than funding can be identified, the cost of compliance has far exceeded the revenues generated by the Stormwater Pollution Abatement Charge. The City will need to identify a new source of ongoing funding for new projects.

The 2003 City's Blue Ribbon Task Force Report addressed condition assessment of the Bureau of Sanitation's stormwater system infrastructure for flood protection and touched on the anticipated regulatory requirements that would need to be met. It was concluded that the Bureau of Sanitation should maintain a

rating of "D" or better but no recommendation on improving urban runoff was mentioned. As a result of more stringent federal and local requirements surrounding urban runoff, it has become necessary for the City to assess urban runoff as an independent category.

description

The City of Los Angeles is tributary to four major watersheds: Santa Monica Bay, Los Angeles River, Ballona Creek and Dominguez Channel. A watershed is described as all the land that drains to a common low point. With urban runoff flowing into the City's water bodies, the impact of polluted urban runoff on our water bodies has led to more stringent regulatory requirements. As a result, the four major watersheds in the Los Angeles region have major pollutants being addressed in more than 60 Total Maximum Daily Loads.

Each Total Maximum Daily Load requires the following: 1) a coordinated monitoring plan to establish a baseline and assess overall compliance; 2) an implementation plan that identifies how the water body will be brought into compliance by implementing water-quality improvement projects; and 3) in some cases, performance of special studies. The Bureau of Sanitation has taken a leadership role on many of these Total Maximum Daily Loads and has been proactive in working with surrounding municipalities to develop and implement plans for many of the Total Maximum Daily Loads. Implementing the projects identified in these plans is estimated to cost millions of dollars.

Throughout the City, numerous water quality projects have been implemented using a variety of techniques and green strategies. The most visible of these projects are the catch basin screens and inserts that prevent trash from entering the storm drain system and the Low Flow Diversions along Santa Monica Bay that divert dry weather urban runoff to the sanitary sewer. Additionally, the Bureau of Sanitation is continually researching new strategies to comply with new Total Maximum Daily Loads. These strategies include green solutions such as Low Impact Development, green structural, best management practices and stormwater reuse. It is anticipated that $220 million per year in additional funding is needed in order to implement projects throughout the City to meet these water quality standards, and an additional $30 – $50 million is needed annually for routine maintenance over the next 10 years.

assessment

Criteria for assessing compliance with Water Quality Standards and Total Maximum Daily Loads are based on implementation efforts that are successful enough to reflect significant improvements in water

quality, leading to Total Maximum Daily Loads compliance and this grading is also consistent with the 2005 American Society of Civil Engineers Los Angeles County Chapter's evaluation of urban runoff.

The four major watersheds (Santa Monica Bay, Los Angeles River, Ballona Creek and Dominguez Channel) and, three of the larger impaired water bodies (Machado Lake, Marina del Rey, and Los Angeles Harbor) within those watersheds were evaluated. For each watershed and parameter, grades were established and weighted equally for a composite total. A scale of A = 4, B =3, C = 2, D=1, F=0 was adopted for numerical weighting and development of a Watershed Grade Point Average.

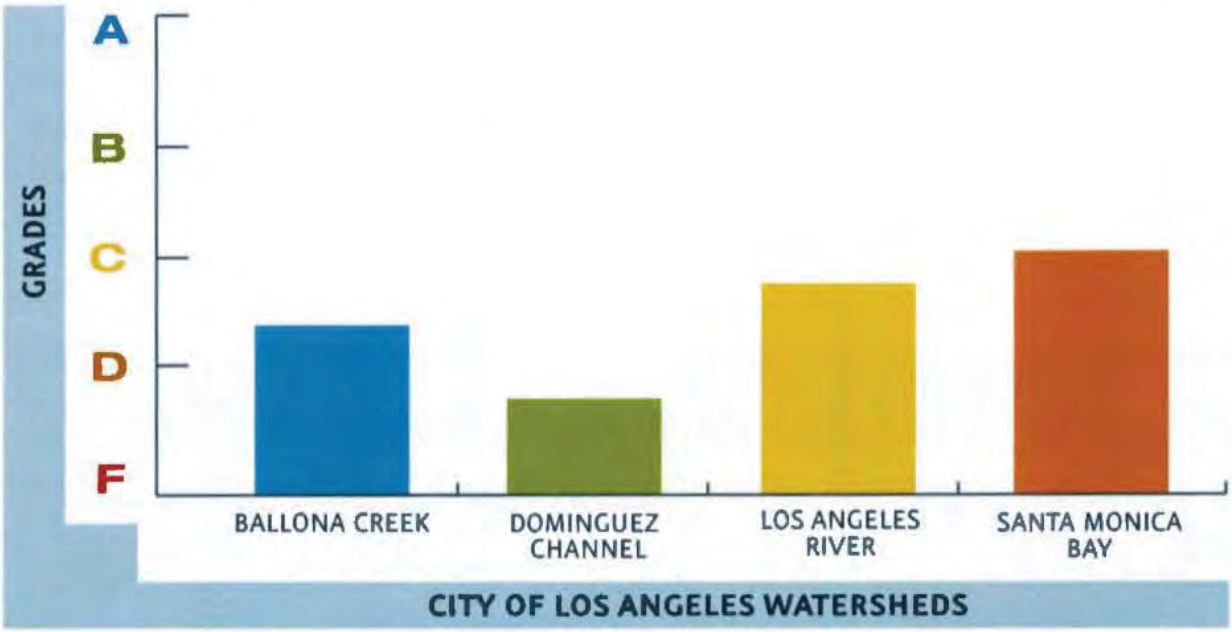
The Composite City of Los Angeles Watershed GPA is 1.4 or a "D" for the City.

For a complete listing of the watersheds and their assessment, see the Bureau of Sanitation's intranet page at: http://www.lastormwater.org/Siteorg/download/techman.htm

grades

URBAN RUNOFF
current grade: D
recommended grade: C

GRADE	DESCRIPTION- IMPAIRMENTS / WATER QUALITY CONDITIONS
A	Implementation efforts are complete and are in full compliance with the Water Quality Standards.
B	Majority of Implementation efforts are complete and interim compliance is being met.
C	Some Implementation efforts are underway and interim compliance is being met.
D	Implementation Plan developed but not implemented. Negligible improvements in water quality.
F	No efforts underway for impaired waterbody.



recommendations

As discussed previously, projects already underway provide a solid start on improving water quality, but more Total Maximum Daily Loads will require additional projects and funding. Proposition O has proven to be a step in the right direction. However, the Stormwater Pollution Abatement Charge that is dedicated to provide for flood protection and pollution abatement cannot even generate adequate revenues for flood protection, let alone the revenues needed for maintaining Total Maximum Daily Load compliance. Unlike other infrastructures that have been in place for decades, the infrastructure needed to improve urban runoff water quality has yet to be constructed.

Possible funding sources may include, but are not limited to:

- Increasing the City's Stormwater Pollution Abatement Charge,
- Partner with the Los Angeles County Department of Public Works to assess County wide Stormwater fees, and
- Seek major amendments to the Clean Water Act to procure massive federal funding, similar to the 1970s program that established 80% federal and 20% local funding for the expansion of the City's wastewater treatment plants.

Given the timetable for compliance is more than several years, it is unfeasible for the City to attain an "A" grade. At a minimum, in order for the City to maintain compliance with the Total Maximum Daily Loads, an improvement from a "D" to a "C" is needed. A Summary of the funding needed to improve the urban runoff infrastructure from a "D" to a "C" is as follows:

URBAN RUNOFF
10-YEAR CAPITAL IMPROVEMENT EXPENDITURE PROGRAM

EXPENDITURE	TOTAL COST $ in Millions	SECURED FUNDING $ in Millions	FUNDING NEEDED $ in Millions
Current MS4 Permit Requirements	$ 350	$ 250	$ 100
Operation & Maintenance of Prop O Projects	$ 175	$ 0	$ 175
New MS4 Permit Requirements	$ 250	$ 0	$ 250
Flood Protection	$ 75	$ 30	$ 45
Total Maximum Daily Loads Projects	$ 2,650	$ 0	$ 2,650
TOTAL EXPENDITURE	**$ 3,500**	**$ 280**	**$ 3,220**

WASTEWATER COLLECTION

overview

The Bureau of Sanitation owns and operates one of the largest wastewater collection system in the country. Before the late 1800s, the City's primary means of sewage disposal included direct on-land irrigation for farms and sewer diversions, such as cesspools or privy vaults. Rapid growth in the 1920s led to the immediate relief of sewers and other infrastructure improvements. Dockweiler Sewer was built during that period, becoming the first outfall sewer in the City. As capacity needs increased, the East Central Interceptor Sewer and North Outfall Sewer were built in the past decade.

Today, the current network consists of over 6,700 miles of public sewers that serves over 4 million people and 29 contract agencies. To meet the growing demand while maintaining a high quality of service, the Bureau of Sanitation continuously assesses and improves the condition of its wastewater collection and conveyance system through the use of planning and infrastructure studies.

Based on the 2003 City's Blue Ribbon Task Force Report, in order to fully fund the Wastewater Capital Improvement Program through the Sewer Construction and Maintenance Fund, a total of $1.8 billion over 10 years (2003-2013) was required. The Sewer Construction and Maintenance Fund operates as an enterprise fund. Revenues generated from the City's sewer service charge as well as revenues from other agencies fully fund its operations, maintenance, and capital programs. In the report, an estimated 500 miles of sewer were identified as C and D pipe lines. Due to the urgency of the project, the identified sewers may not be included in the current Wastewater Capital Improvement Program, but will be added in the future. Based on the Wastewater Capital Improvement Program, of the 468 miles of sewers listed, approximately 206 miles have been rehabilitated.

Through these studies, deficiencies in the system are identified to be addressed. Many of the most severe deficiencies are being or have been repaired. As deficiencies are identified, their respective conditions are used to define and prioritize the necessary improvement projects for inclusion in the Wastewater Capital Improvement Program. In the current 2009-2018 Wastewater Capital Improvement Program, $989 million is needed over the next 10 years to maintain and rehabilitate the current condition of the wastewater collection system.

description

The Bureau of Sanitation provides wastewater collection, treatment, and disposal services for approximately 4 million residents within a 600-square-mile service area, including 29 contract agencies outside the City. The Bureau of Sanitation's more than 6,700 miles of public sewers that can convey about 500 million gallons per day of flow to the Bureau of Sanitation's four wastewater treatment and water reclamation plants.

The wastewater collection system is separated into two networks. The larger Hyperion System serves approximately 95% of the population and conveys wastewater to the Hyperion Treatment Plant. The Terminal Island system conveys wastewater to the Terminal Island Treatment Plant.

The Bureau of Sanitation's sewer system is broken down into primary sewers (16-inches and larger in diameter) and secondary sewers (less than 16-inches in diameter). Secondary sewers serve the local neighborhoods and make up about 90% of the Bureau of Sanitation's wastewater collection system network. The flows from the secondary sewers feed into the primary sewer lines. Primary sewers are represented by the trunk, interceptor, and outfall portion of the system and convey wastewater to the treatment plants. There are approximately 710 miles of primary sewers which make up more than 10% of the length of the entire system. This represents the greatest potential liability to the City in the event of a failure since the primary sewers carry all the flow.

The wastewater collection system also includes 44 wastewater pumping plants. Wastewater pumping plants are used throughout the City to convey sewage from lower elevations to higher elevations for optimal gravity flow. The various pumping plant capacities in the Bureau of Sanitation's collection system ranges from 30 gallons per minute to 27,000 gallons per minute.

assessment

The wastewater collection grading system is comparable to the American Society of Civil Engineers scoring system for evaluating public infrastructure. The assessment is prioritized based on the greatest potential risk and adverse impact on the community. The sewer system was assessed for physical condition and hydraulic capacity. The physical condition is assessed with closed circuit television cameras that have been deployed throughout a significant portion of the system. These results were then extrapolated to achieve a system-wide assessment. Age, pipe material, and size were key attributes to determine the grade for the structural assessment. A second assessment was based on the hydraulic

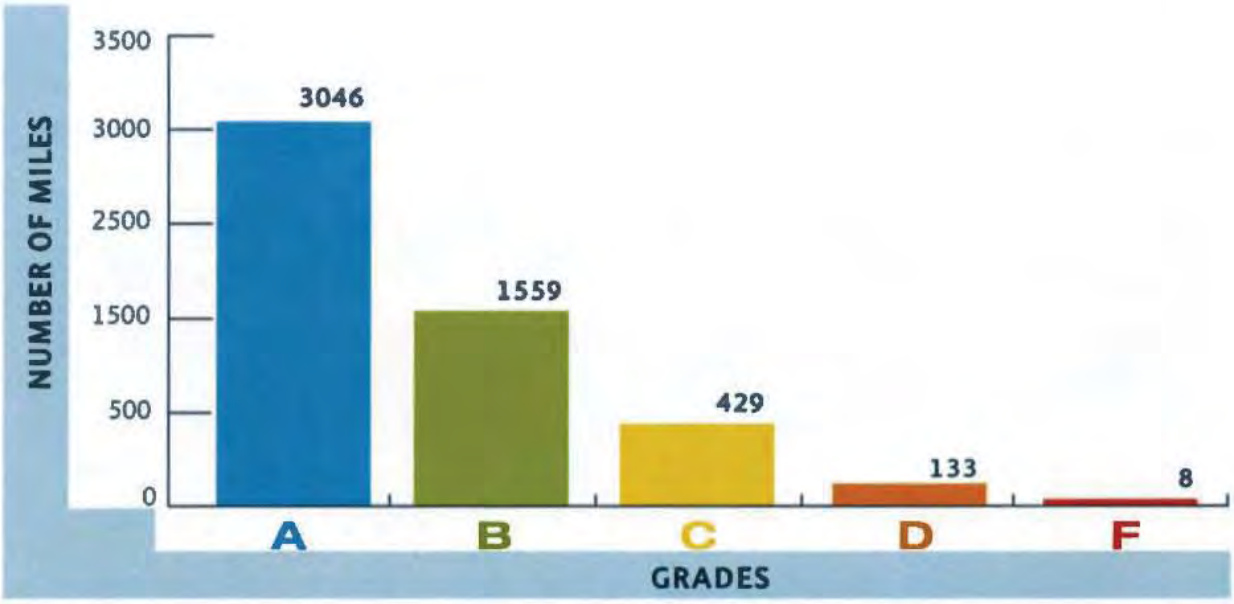
capacity of the wastewater collection system components, including the sewers, pumping plants, interceptors, and outfall sewers. Both assessments reported the condition in a manner similar to a collegiate system from A to F with A being the best and F the poorest. The current average overall sewer system condition rating is a B-. Nevertheless, there are still about 571 miles of sewers with less than B ratings that should be rehabilitated based on the urgency of the project. Currently, 20% of the entire collection system has not been assessed yet.

For a complete listing of the wastewater collection system and their assessment, see the 2009 Infrastructure Report – Wastewater Collection System.

grades

WASTEWATER COLLECTION
current grade: B-
recommended grade: B+

GRADE	DESCRIPTION
A	Condition is almost like a new sewer pipe. Sufficient capacity to accommodate future growth and wet weather flows. No annual cleaning maintenance required to remove roots or other debris.
B	No immediate repairs required. Sewer pipe has limited hairline cracks, corrosion, and roots. Sufficient capacity to accommodate future growth and wet weather flows. Routine maintenance and inspection required.
C	Sewer repairs required within the next 10 years. Moderate cracks/fractures, continuous corrosion, infiltration, and roots. Missing grout/mortar or damage in liner. Only sufficient capacity to handle current flows; limited wet weather capacity. Multiple cleaning required each year to remove roots and other debris.
D	Sewer repairs required within 5 years. Significant fractures, corrosion, infiltration/ roots. Missing bricks or ceramic tiles. Broken pipes with holes, joint separation, or reinforcement exposure. Only sufficient capacity to handle current flows; no wet weather capacity. Multiple cleaning required each year.
F	Immediate repairs required. Collapsed pipe/street, dirt pipe, missing crown of pipe, void in backfill, or full flow obstruction/blockage with threat of overflow. Insufficient capacity; unable to support current flows.



recommendations

According to the Wastewater Capital Improvement Program, 468 miles of sewers are listed to be rehabilitated; approximately 207 miles have been completed. Based on the existing and projected assessment, 571 miles of sewer have been identified as less than B ratings sewers, which will be added into the upcoming Wastewater Capital Improvement Programs based on the urgency of the project. In addition, the remaining 262 miles of sewers currently listed in the Wastewater Capital Improvement Program will also be completed within the next ten years.

In order to improve the wastewater collection system condition to "B+", constant repair and renewal of the system is required. The renewal is essential to the protection of the public health and safety, reduction of avoidable sewer overflows and reducing the City's exposure to liability from regulatory penalties and third party lawsuits. But, most importantly, renewing the sewers that are in a worse than B condition is critical to the City's efforts to improve the quality of life in its neighborhoods and protect our water resources, while allowing for the economic and social revitalization of the City.

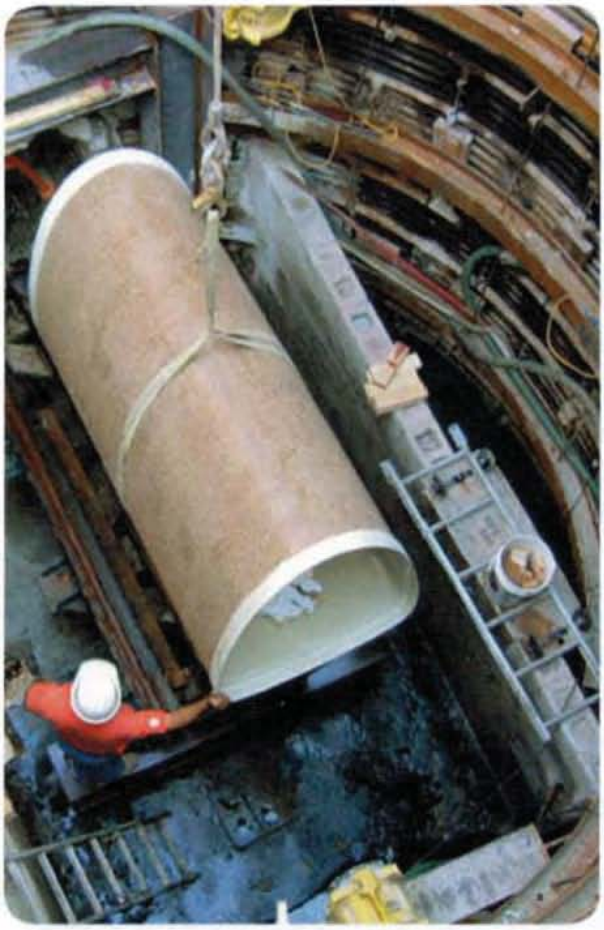
It is estimated that the allocation of $989 million through the various funding sources should be obtained. A summary of the funding needed to maintain the Wastewater Collection System infrastructure is as follows:

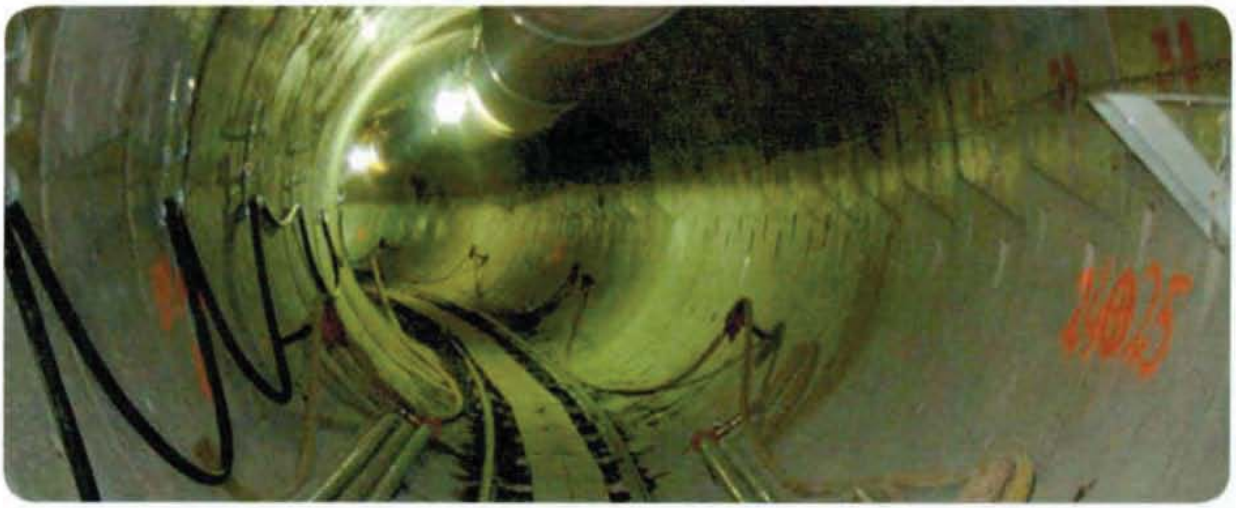
WASTEWATER COLLECTION
10-YEAR CAPITAL IMPROVEMENT EXPENDITURE PROGRAM

EXPENDITURE	TOTAL COST $ in Millions	SECURED FUNDING $ in Millions	FUNDING NEEDED $ in Millions	FUNDING NEEDED
Emergency Repairs	$ 131	$ 131	$ 0	SCM
Primary Sewers	$ 292	$ 67	$ 225	SCM
Secondary Sewers	$ 312	$ 87	$ 225	SCM
Pumping Stations*	$ 73	$ 4	$ 69	SCM
Other Sewers (Interceptors, Outfall, etc)	$ 165	$ 75	$ 90	SCM
Master Planning (BOE and BOS)*	$ 16	$ 7	$ 9	SCM
TOTAL EXPENDITURES	**$ 989**	**$ 371**	**$ 618**	---

* Pumping stations only include wastewater conveyance only. Assumed no rate increases for the next 10 years.
* BOE stands for the Bureau of Engineering and BOS designates for the Bureau of Sanitation.

Based on the table, under the existing rate structure, funding is only secured for Fiscal Year 2010-2011 and Fiscal Year 2011-2012. Funding is required for the next 8 years through the Sewer Construction and Maintenance Fund, thus a rate increase may be required in order to maintain the current conditions in the Wastewater Collection System.

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WASTEWATER TREATMENT

overview

The Bureau of Sanitation owns and operates the City's wastewater treatment system, with the history of the City's wastewater treatment service dating back to 1894, when the first wastewater collection facility, the predecessor of modern Hyperion Treatment Plant was built on Santa Monica Bay. In 1935, the Terminal Island Water Reclamation Plant came into operation to provide service to the Harbor Area. In 1976, the Los Angeles-Glendale Water Reclamation Plant came into operation. In 1985, the Donald C. Tillman Water Reclamation Plant was built in San Fernando Valley. In the 1990s, Hyperion Treatment Plant received a major upgrade to full secondary treatment.

In the previous assessment in 2003, the infrastructure of wastewater treatment plants received an overall grade of "B". Between 2003 and 2010, approximately 370 million construction dollars have been spent on more than 162 capital improvement projects. Today, the overall infrastructure of wastewater treatment plants is "B-".

The primary source of funding for the Bureau of Sanitation's wastewater treatment program comes from the user fees. The Bureau of Sanitation is responsible for the operation and maintenance of the wastewater treatment plants. The Bureau of Engineering manages the design and construction projects for this infrastructure system.

The 2003 City's Blue Ribbon Task Force Report addressed the condition assessment of the Bureau of Sanitation's infrastructure for wastewater treatment plants. A goal had been set in 2003 to maintain the overall grade of "B" for the wastewater treatments plants program.

description

The Bureau of Sanitation's wastewater treatment plants treat residential and commercial wastewater generated within its 600 square mile service area. Treatment facilities range from secondary to advanced tertiary with effluents being discharged into reclaimed water systems or the environment.

The Bureau of Sanitation owns and operates four wastewater treatment facilities. The largest of these is the 450 million gallons per day Hyperion Treatment Plant. Over two-thirds of Los Angeles' wastewater, primarily from the central and western sections of the City, is treated at Hyperion Treatment Plant. The Donald C. Tillman Water Reclamation Plant, with a capacity of 80 million gallons per day, treats flows from the San Fernando Valley. The 20 million gallons per day Los Angeles-Glendale Water Reclamation Plant serves the area around Griffith Park, including the Glendale and Burbank communities. The 30 million gallons per day Terminal Island Wastewater Treatment Plant in San Pedro serves the communities surrounding the Los Angeles Harbor.

More detailed information about the City of Los Angeles' wastewater treatment facilities is available at: http://www.lasewers.org/treatment_plants/about/index.htm

assessments

The Bureau of Engineering conducts an assessment of wastewater treatment plant processes every three to five years. The assessment is largely based on the existing records (Capital Improvement Projects listing, Project Schedules, and Plant Drawings) and interviews of the key on-site personnel. The physical condition and capacity of the wastewater treatment plants were identified and the entire infrastructure was graded from "A" to "F". Other elements of consideration included performance and funding needs.

The grading system was established by a Board of Public Works Report titled "Infrastructure Condition Assessment Summaries" and was adopted on January 10, 2000. This grading system is used to determine the overall grade of "B-" for the wastewater treatment program.

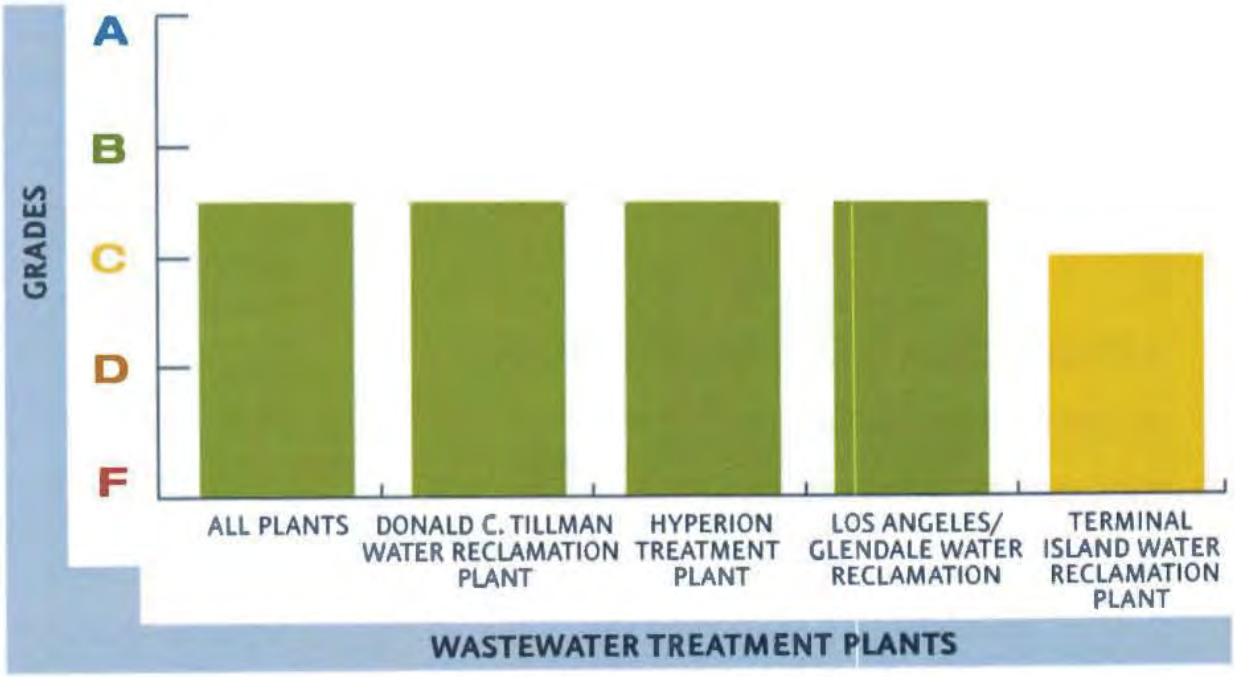
grades

WASTEWATER TREATMENT

current grade: **B-**

recommended grade: **B**

GRADE	DESCRIPTION
A	In very good physical condition. Has the capacity to meet the future demand. No action required.
B	In good to fair physical condition. Has the capacity to meet current demand. No immediate action required.
C	In fair to poor physical condition. Has the capacity to handle current and future dry weather flow. Requires routine action.
D	In very poor physical condition. Has the capacity to meet only the current dry weather flow. Requires significant action.
F	Requires emergency action.



recommendations

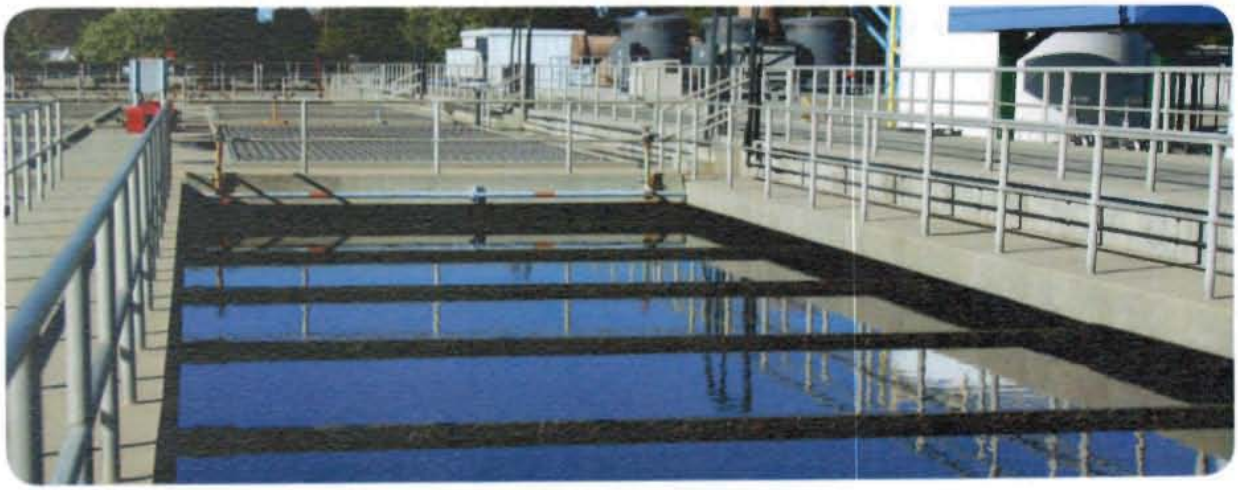
Currently, three wastewater treatment and water reclamation facilities are assigned a "B-" rating. One treatment plant is at the grade "C". It is recommended that the wastewater treatment and water reclamation facilities of the Bureau of Sanitation be improved to a minimum overall operating condition of "B" or better with no individual treatment process being lower than "C". The City should also seek to bring improvements to the system where opportunities exist in order to meet projected increase in flows, enhance efficiencies, and continue to protect the public and the environment.

For the wastewater treatment plants, the 10-year planned expenditures for the Wastewater Capital Improvement Program is estimated at $640 million. Due to the reduction in the City's budget caused by the recent economic downturn, many projects in the wastewater treatment program have either been canceled or rescheduled to later fiscal years to balance with the projected available funding. These delays may reduce the facilities' grades below the levels recommended above.

WASTEWATER TREATMENT PLANTS
10-YEAR CAPITAL IMPROVEMENT EXPENDITURE PROGRAM

PLANT	EXPENDITURES $ in Millions
Donald C. Tillman Water Reclamation Plant	$ 52
Hyperion Treatment Plant	$ 475
Los Angeles/Glendale Water Reclamation Plant	$ 40
Terminal Island Water Reclamation Plant	$ 73
TOTAL WASTEWATER CAPITAL IMPROVEMENT PROGRAM 2010-11 THROUGH 2019-2020	**$ 640**

Detailed procedures and policies are outlined in manuals to ensure that projects meet the standards set by the City of Los Angeles.



Acknowledgements

The preparation of the 2010 Department of Public Works Infrastructure Report Card (IRC) benefited from the assistance and expertise of the following employees who participated wholeheartedly in this process.

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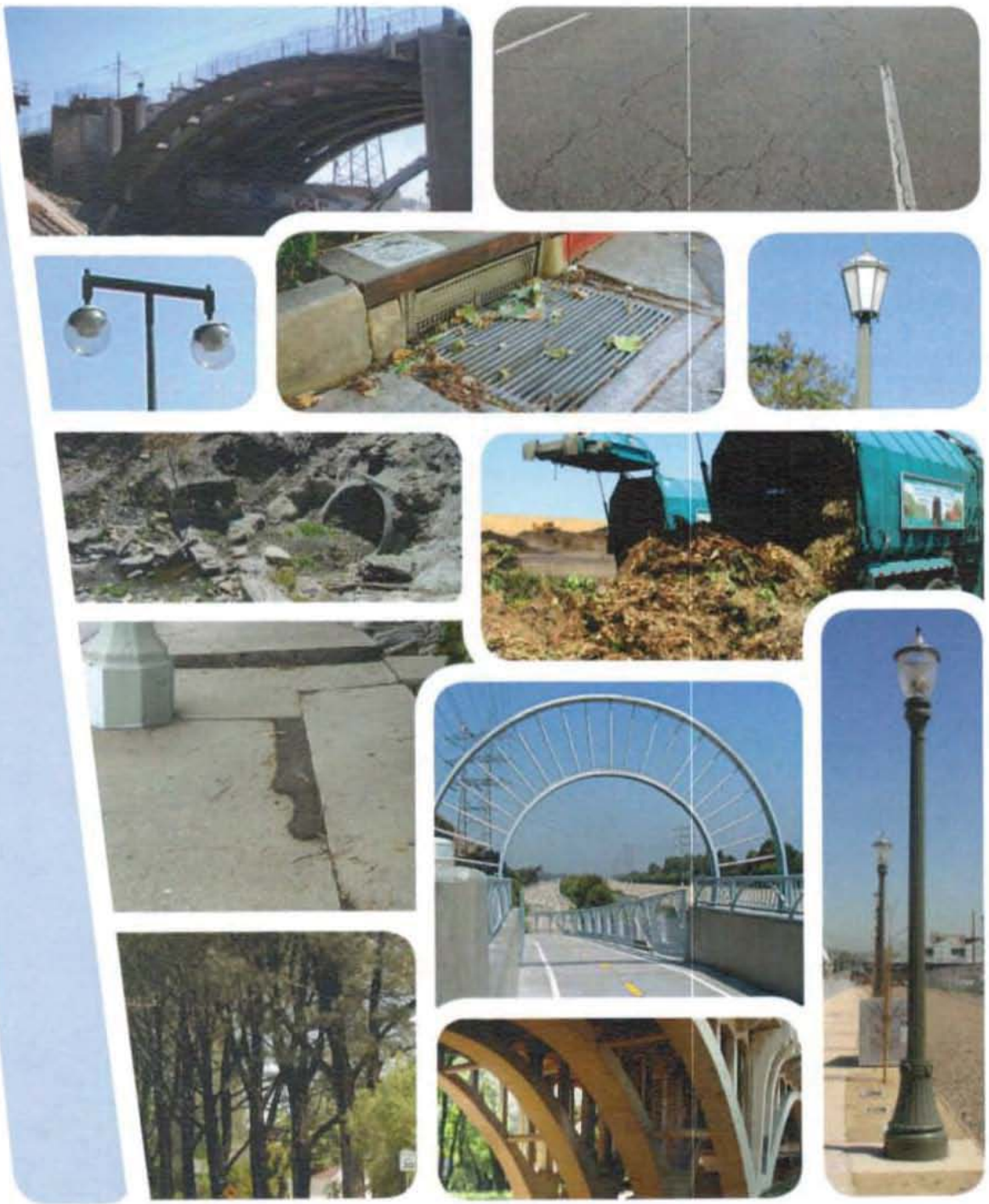
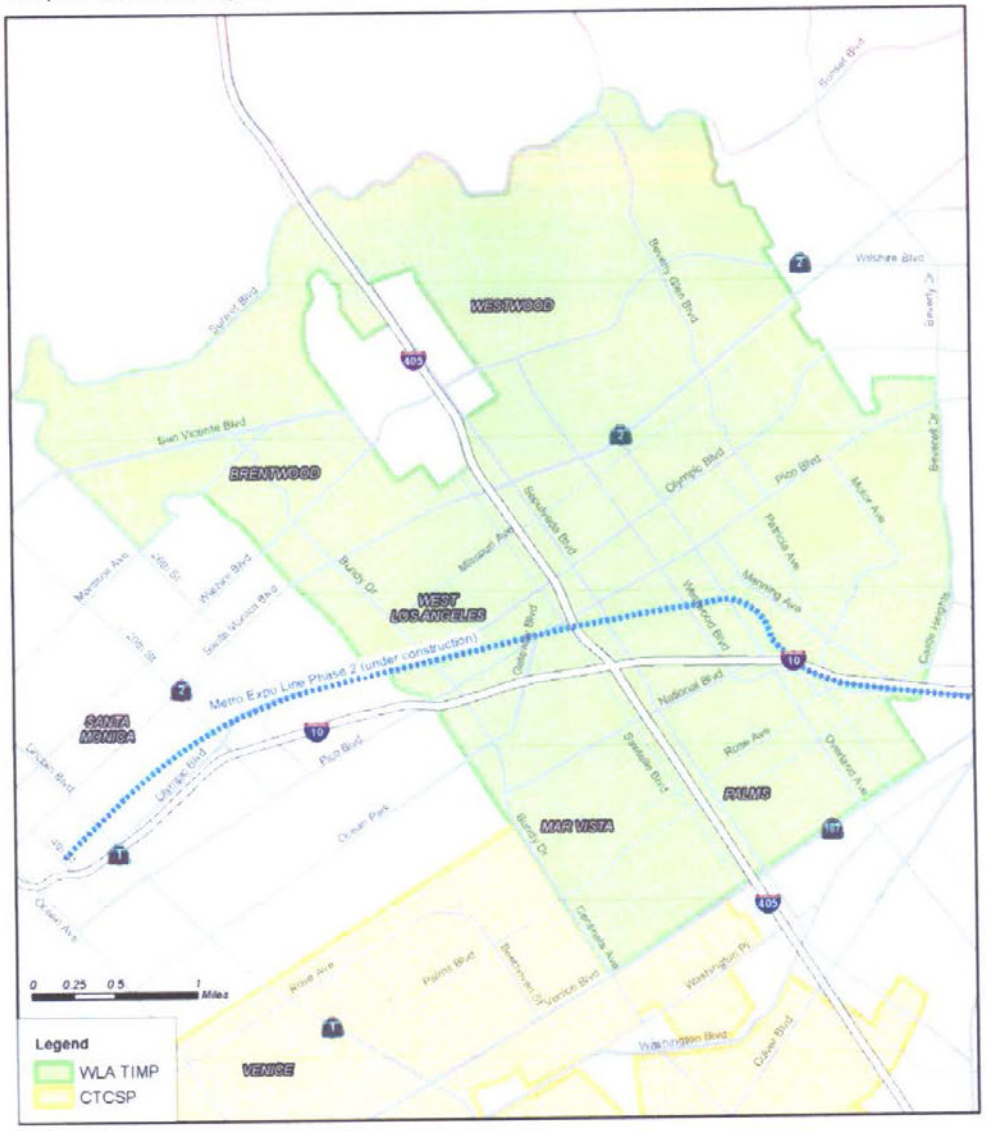


Comment Letter PC3 Attachments

EXHIBIT 1
WLA TIMP BOUNDARIES

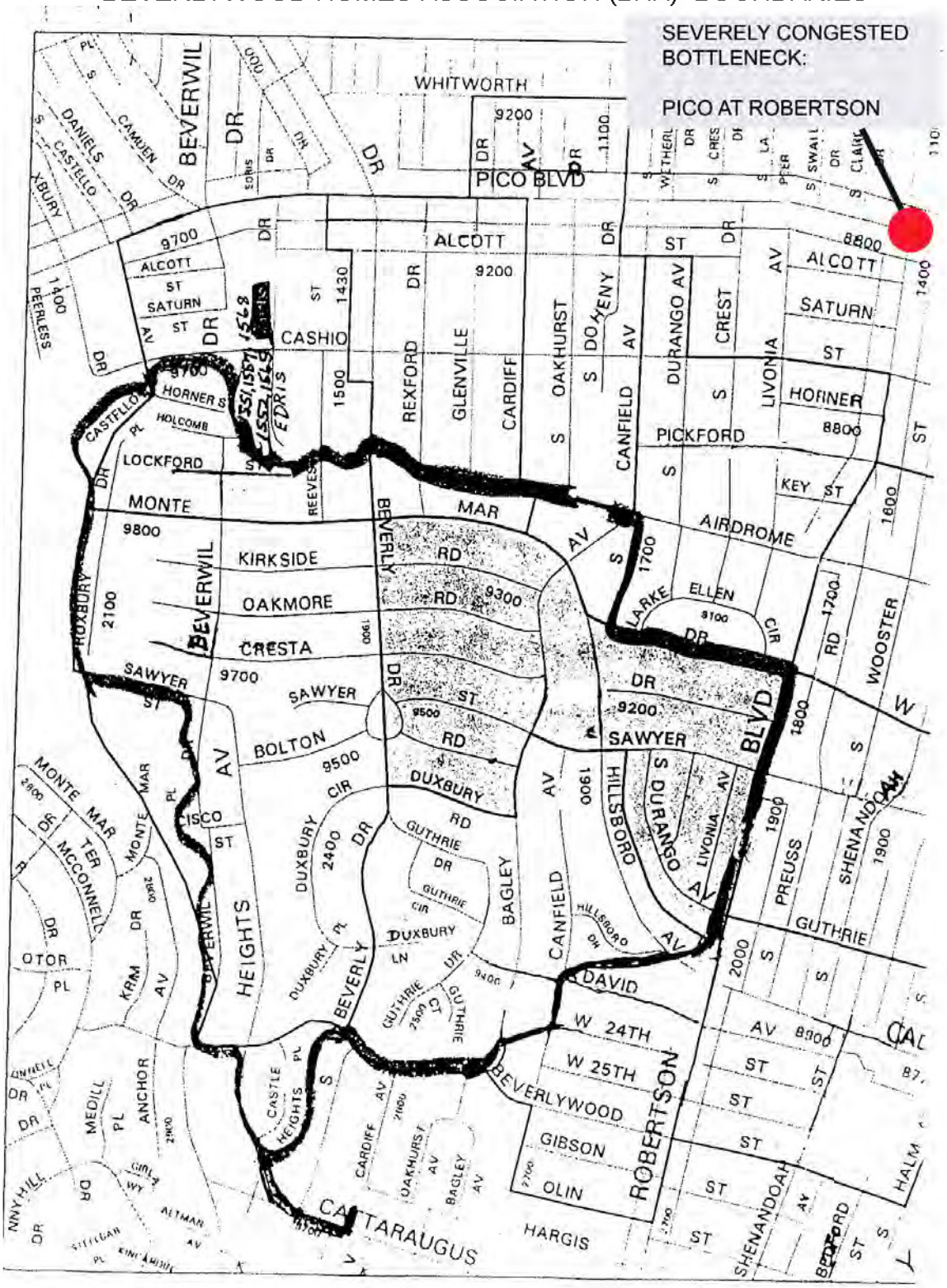
Map 1. West Los Angeles Transportation Improvement and Mitigation Specific Plan Area



Source: U.S. Census Bureau, Geography Division. 2010

EXHIBIT 2

BEVERLYWOOD HOMES ASSOCIATION (BHA) BOUNDARIES



Comment Letter PC5 Attachments

The Fix The City Lawsuit

Background, Goals and Implications

The Real Reason L.A.'s Infrastructure is Failing and Critical Services Are Being Slashed

Executive Summary

Infrastructure is a prerequisite for economic success of a city[1]. The prosperity of cities depends upon their livability: Good schools, safe parks, properly staffed police and fire, gridlock-free streets, clean air and sufficient water. In Los Angeles these vital public services are suffering in large part because the City of Los Angeles ("City"), with over 4 million people and growing, has failed to monitor and invest in its crumbling infrastructure and has allowed development to outpace and exceed its capacity to provide essential services. It did not have to be this way- at least according to the City.

> *"What became clear was that a crucial feature of dealing with growth impacts was contained in the General Plan Framework – its program for timing allowable development with available infrastructure…"*
> *- L.A. City Attorney's Office – May, 1998*

Facing criticism from the U.S. Environmental Protection Agency and state agencies, the City sought to write a new General Plan in the early 90's. Their goal was to put in place some mechanism to ensure that essential City services were not overwhelmed by over-development. Their solution was quite elegant: Allow development based on the capacity of the infrastructure to sustain that development. In this way, the General Plan could "react" to changes such as earthquakes, financial stress or inaccurate growth projections by simply monitoring, reporting on and then reacting to changes in the infrastructure of the City, its services and its financial condition. If the capacity of the infrastructure or the City's ability to fund/expand the infrastructure changed, so too would the amount of allowable development.

> *"The policy requires that type, amount, and location of development be correlated with the provision of adequate supporting infrastructure and services."*
> *– City of L.A. General Plan*

The City Council approved the new General Plan in 1996 (re-adopted in 2001) including the implementation of its "crucial" new super-mitigation that would be able to mitigate the potential significant impacts of the new General Plan. That mitigation, called the Infrastructure Mitigation throughout this document, involved combining monitoring data, city and non-city databases and the city's ability to fund improvements into an "Annual Report on Growth and Infrastructure." That Report forms the basis of the City's ability to implement the required mitigation of adding new infrastructure or implementing building controls if infrastructure becomes threatened. They said:

> "Policies 3.3.2… contained in the General Plan Framework represent measures that would serve to lessen impacts relative to fire/EMS. Policy 3.3.2 directs monitoring of infrastructure and public service capacities to determine need within each CPA for improvements based upon planning standards. This policy also directs determinations of the level of growth that should correlate with the level of capital, facility, or service improvement that are necessary to accommodate that level of growth. In addition, the policy directs the establishment of programs for infrastructure and public service improvements to accommodate development in areas the General Plan Framework targets for growth. Lastly, the policy requires that type, amount, and location of development be correlated with the provision of adequate supporting infrastructure and services."

As testimony to the importance of this key feature, the City Council found that all other proposed alternatives to the adopted General Plan were infeasible because they did not contain the essential feedback mechanism – the Infrastructure Mitigation as informed by the Annual Report on Growth and Infrastructure. Once the City adopted the Infrastructure Mitigation via the Annual Report on Growth and Infrastructure as a mitigation measure, it became obligated by law to use it as described[2]. It further cannot simply choose to stop abiding by the mitigation nor can it remove the obligation without new environmental review and proof that the mitigation is no longer needed.

[1] http://citiesspeak.org/2011/03/18/state-of-the-cities-in-2011-infrastructure-a-prerequisite-for-economic-success/

[2] *(Public Resources Code §21081.6), AB3170*

When the City was sued on the validity of its new General Plan and its mitigations, it cited the Infrastructure Mitigation as the reason the General Plan was adopted properly. That lawsuit ended in 2001 (the City won based on its reliance on the Infrastructure Mitigation).

Right after winning the case in 2001, the Director of the Planning Department, Con Howe decided without any public outreach or authorization from the City Council, and in violation of the law(See footnotes 1-3), to terminate the Annual Report which enables the Infrastructure Mitigation requirement. This unilateral decision to strip the General Plan of the key method by which the City knows it can sustain more development set us down the road to where we find ourselves today: Furloughed firefighters, closed engine companies, gridlocked traffic, cash-strapped schools, water rationing, decreased park and library access and deteriorating water pipes, sidewalks and streets. (Con Howe now works for CityView, a major L.A. developer.)

While blindly approving project after project in the name of much-needed developer fees, the City chose to ignore a report by its own controller that stated that the cost of adding and maintaining infrastructure consumed by development exceeded the fees being collected. In other words, the City was losing money on every sale and trying to make it up in volume. This pyramid-scheme worked for a while, as pyramid schemes usually do. Unfortunately, the current down economy and sheer volume of deferred infrastructure maintenance has come home to roost, and Los Angeles residents and businesses are now all paying the price.

As a direct result of the City's failure to adhere to the law and the resulting infrastructure chaos, community leaders across the City have mounted an intervention for its development-addicted government. They filed lawsuits demanding that the City prepare and use the Infrastructure Report as required.

Infrastructure is critical. It means:

- **Police** can respond when there is crime and can patrol to prevent crime.
- **Fire** fighters and paramedics are properly funded and can respond in time to save lives.
- **Schools** have the resources to teach our kids.
- There is sufficient **water** for the residents of the City.
- **Parks and Libraries** can stay open more hours.
- **Streets** and **sidewalks** aren't allowed to deteriorate.
- **Traffic** isn't allowed to degenerate into gridlock.
- The City has the resources to handle natural disasters such as **earthquakes.**

Los Angeles has talked the urban planning talk, but it has not walked the implementation walk. It is running on empty and on the verge of bankruptcy. Fiscal and physical crises have merged to create the perfect municipal storm. The costs of deferred infrastructure maintenance are staggering: It will now require billions to bring the crumbling infrastructure up to date.

If the Mayor and the City Council had implemented the key mitigation of Los Angeles' General Plan which requires an Infrastructure Mitigation relying on the Annual Report for its data, this City would be in far better shape. The Infrastructure Mitigation was to direct the Planning Commission and City Council to trigger adjustments in development at the Community Plan level. That would mean saying "no" to some projects until investment in the City's infrastructure, including public safety, was assured. Unfortunately, "no" is not something that well-connected developers, lobbyists and consultants hear from the City.

Only proper planning, monitoring and action on the part of the City can ensure that the public receives adequate services and a livable City. By refusing to prepare and use the Infrastructure Report it had promised, the Mayor and City Council have betrayed the public trust and put its citizenry in harm's way.

The Fix The City lawsuit will force the City to obey the law and return the emphasis back to the needs of the current residents and businesses. This will be accomplished through implementation of required tracking and mitigation of burgeoning growth, and ensuring that the infrastructure necessary, including streets, sewers, storm drains, firefighters, police, libraries, parks and other City services, is available.

This position paper discusses the specifics of the lawsuits, the General Plan and the essential mitigation called the Infrastructure Mitigation as informed by the "Annual Report on Growth and Infrastructure."

Introduction

"What became clear was that a crucial feature of dealing with growth impacts was contained in the General Plan Framework – its program for timing allowable development with available infrastructure…" *L.A. City Attorney Brief defending the General Plan Process and its now-abandoned policy.*

"We have the worst cut-through traffic of any area of the City. It's due to the fact that development has continued without proper infrastructure."
John Fisher, LADOT - WNC meeting: July, 2008

If only that "crucial feature" was still clear to the City, there would be no need for the current lawsuit. It was certainly clearer many years back when then-California Assemblyman Antonio Villaraigosa voiced concern about the General Plan process stating that "a root cause of the "disconnect" that exists between the government, the development community and the general public is the public's feeling that it does not have a meaningful role in the process." He then stated that this leads to a "politicization of the planning and permitting process" which leads to the "kind of erratic, project-based planning that aggravates everybody involved." We wonder where that Antonio Villaraigosa went.

When asked, the City will tell you the only reason our roads are crumbling, police hiring has been frozen, fire services have been cut, and water is being rationed is because of budgetary constraints as a result of the poor economy and Proposition 13.

In reality, the City' infrastructure problems are in large part the direct result of the City failing to put promised controls on development if sufficient infrastructure did not exist to support new development.

In Los Angeles, development approvals are used (misguidedly) to generate revenue with little consideration for protecting public health and safety and maintaining the livability of the City for its residents. In Los Angeles, the City constantly declares that major projects will have no significant impacts despite all evidence to the contrary. In fact, unlike any other business, the City allows developers to only state the (often theoretical) income that development will bring without discuss the other side of the ledger – the cost of supporting that growth. That failed approach is now bearing bitter fruit.

It wasn't supposed to be this way. Had development been based on the availability of infrastructure rather than the ability of some developers to game the approval process, we would not be facing the severe degradation in City services we now face. Instead, a ponzi-scheme dependence upon inadequate development fees has driven the City to exceed its capacity to protect public health and safety.

In order to control serious environmental impacts of projected growth and deteriorating infrastructure, the City installed a monitoring and mitigation program to track its growth and the impacts of that growth on the City infrastructure. The City went a step further with a policy that established a mechanism to inform City officials and the public on the impact of growth and mandated that building controls would be put into effect if the infrastructure was "threatened," not merely overburdened.

The mechanism designed by the City to prevent precisely the types of failures we are now seeing is called the Infrastructure Mitigation which was to be enabled and informed by the Annual Report on Growth and Infrastructure

(ARGI). That report has never truly been created and the mitigation mechanism was never used as promised. Water main breaks, cuts in fire services, gridlocked traffic, water rationing, deteriorating streets and a freeze on hiring new police officers is testimony to both the wisdom of planners in 1996 and the shortsightedness of all those who have ignored the requirements set forth in the General Plan since.

Statement of the problem

As stated by John Fisher of LADOT at a Westside Neighborhood Council meeting in July, 2008, we have problems because "*development has continued without proper infrastructure*."

The General Plan sought to solve this problem through a simple mechanism: Development controls should be put in place unless there is adequate infrastructure OR the City has the resources to construct adequate infrastructure within 12 months. This simple and effective mitigation was to be informed through something the City called the "Annual Report on Growth and Infrastructure." (ARGI)

> *"…if this monitoring finds that population in the Plan area is occurring faster than projected; and, that infrastructure resource capacities are threatened, particularly critical ones such as water and sewerage; and, that there is not a clear commitment to at least begin the necessary improvements within twelve months; then building controls should be put into effect, for all or portions of the West Los Angeles Community, until land use designations for the Community Plan and corresponding zoning are revised to limit development."*
> **Various Community Plans – West L.A. Shown**

Instead of implementing its required mitigation, the City has decided to overburden itself with new development that does not pay its way (See Laura Chick Audit, March 23, 2009). The audit states:

> *"City departments do not consistently track, plan or budget for maintenance of public improvements installed as a result of conditions of approval for development projects. In addition, some City departments do not collect sufficient fee revenues to cover the costs of maintaining public improvements.*

Essentially, the City loses money on every sale but is trying to make it up in volume. In this Ponzi-scheme method of planning, more and more new projects are required to pay for the excesses of previous projects.

Unfortunately, as with any Ponzi-scheme, when new suckers can't be found, the scheme collapses. Just as with the Madoff scheme, when the economy faltered it exposed the City's scheme. When new projects don't come in to cover the costs of previous projects, budgets dry up and services are cut.

If, however, development was only allowed when infrastructure existed to support it, and if the City charged developers the actual costs to replace and maintain the infrastructure they consume, we would not be seeing the same level of police and fire budgets slashed, roads crumbling and crushing levels of traffic.

Development and growth consume infrastructure. Time creates the need for maintenance. Only proper planning, monitoring and action on the part of the City can make sure that the public receives adequate services and a livable City.

Brief history of the suit

One local community member was researching a project and sought to understand how the City makes its decisions on the regional impacts of a project (such as water consumption). He did research and found references in his community plan to the "Annual Report on Growth and Infrastructure."

His community plan stated:

> *"…if this monitoring finds that population in the Plan area is occurring faster than projected; and, that infrastructure resource capacities are threatened, particularly critical ones such as water and sewerage; and, that there is not a clear commitment to at least begin the necessary improvements within twelve months; then building controls should be put into effect, for all or portions of the West Los Angeles Community, until land use designations for the Community Plan and corresponding zoning are revised to limit development."*

Fascinated, he went to the City's website and looked for the most recent version. The latest one he found: 1998. And that report didn't even contain the required information required to implement the Infrastructure Mitigation.

He then went to Gail Goldberg, then Director of Planning for the City, and asked about the Infrastructure Report and where he could find it. Her response? "Please don't sue me."

A group of community members, homeowner associations and neighborhood councils then asked the City to comply with the General Plan requirement. The City simultaneously refused to provide information and also stated that it had no such requirement to do the Infrastructure Report despite clear evidence to the contrary. The evidence submitted by the community was extensive, though no more clear evidence is required other than the unambiguous statement provided by the City itself – in its (incomplete) Infrastructure Reports.

They said: *"The preparation of this report fulfills a requirement of the General Plan Framework Element to monitor growth and to report on the adequacy of supporting public services and infrastructure."*

Faced with an intransigent City unwilling to follow the law and keep its promises, a group of community members from across Los Angeles filed suit as Fix The City.

A brief history of the Infrastructure Report and its purpose

The City's prior General Plan (the "Centers Concept") was a failure because it did not link goals and policies to actual programs for their implementation. This resulted in unrestrained and misdirected growth in the 1980's which created a strain on the City's ability to maintain infrastructure and avoid significant environmental impacts.

In an effort to learn from its earlier mistakes and change the course of direction, in the 1990's the City embarked upon a three year effort to develop a better General Plan -- culminating in the Framework Element in 1996. Yet after three years of public participation and refining and presumably expenditure of millions of taxpayer dollars[3], the City now declares Planning Department staff persons may internally and unilaterally make fundamental changes to and even deletion of required mitigations, and that they may do so with unbridled discretion and without any public review, input or consideration.

Besides this prospect being a waste of taxpayer dollars invested, this is not a legally tenable position as the Infrastructure Mitigation as informed by the Annual Report is the mainstay mitigation of the General Plan and the key mechanism by which the City will ensure that growth does not degrade the environment or strain City infrastructure and services beyond capacity.

The purpose of the Infrastructure Mitigation is to provide the means to meter growth based on availability of infrastructure. Actually, the City stated it best when it said the Infrastructure Report is to be used "so that allowable increases in density … would not occur until infrastructure and its funding was available." (General Plan EIR, 1998)

This clear, unambiguous statement is essential to the proper functioning of the City: You can't allow new development if you don't have the infrastructure necessary to support the new development and can't pay to improve it.

The City was to accomplish this essential check-and-balance by monitoring actual growth and infrastructure capacity, comparing monitored data to projections and necessary infrastructure levels, and then by implementing building controls if any infrastructure element was threatened. The determination of "threat" would be based on trend lines and other data including the financial health of the City.

[3] Framework Element put together as a result of over one hundred one-on-one interviews with community leaders, followed by eight community workshops, followed by 38 neighborhood workshops, followed by a Citywide Visions workshop, followed by an intensive Framework Project Team working session and a Gallery Walk in City Hall Forecourt to present and obtain feedback from the public, followed by another 16 workshops, followed by the Citywide Options Event and finally presentation to the public and decision makers for adoption and approval…

The Infrastructure Report is not just some document created to sit on a shelf to gather dust (or virtual dust on the internet) and be ignored by everyone. It provided the basis for implementation of the active, key mitigation that protected the City against the impacts of over-development and its predictable adverse impacts.

How do we know this? First, we know this because the City deemed other alternatives to the adopted General Plan infeasible precisely because they did not contain the Infrastructure Mitigation. Second, we know this from the City as it sought to defend its new General Plan during the environmental review process in the mid-1990's and also in court in 2001.

Some relevant quotes from the City in its General Plan EIR and related documents:

> The Framework Element includes an on-going monitoring program to update the demographic forecasts that underpin the plan and its Environmental Impact Report (EIR). The monitoring system will result in the issuance of an Annual Report on Growth and Infrastructure which will be used to modify plan and EIR assumptions and serve as the basis for evaluating the effectiveness of the Framework Element's objectives, policies, programs, and mitigation measures.

> Based on these considerations, it is the intent of the General Plan Framework to: establish a short-term estimate of population growth that can rationally be used for the planning and funding of infrastructure and services; to support growth and encourage patterns of development which reduce potential environmental impacts such as traffic congestion and air emissions; and to improve the quality of life for the City's residents. Recognizing that the demands and impacts of growth may vary due to changing characteristics of the population and technologies, it is the intent of the Framework to set in place a system to monitor and annually report growth demands and impacts as the basis for the implementation of strategies for their accommodation.

As stated above, the City specifically made the finding that all other General Plan alternatives were infeasible precisely because the other alternatives did not "include policies for managing growth and development in relationship to infrastructure capacity."

They were right. In fact, they stated that if this mitigation did not exist, "the greater amounts of permitted population, employment, and housing would result in more significant adverse environmental impacts." Guess what happened.

To be exceptionally clear: The Infrastructure Report was a specific mitigation the City must follow. In its approval of the General Plan, the City stated: *"The policy requires that type, amount, and location of development be correlated with the provision of adequate supporting infrastructure and services."*

How strongly did the City feel about this mitigation? It was their key argument to the courts in the late 1990s on why the General Plan process was legally defensible.

The Hillside Federation had challenged the General Plan, saying that transportation mitigations were speculative as funding was uncertain. In response, the City argued that the Infrastructure Report and its "triggering mechanism" represented a mitigation that was not speculative and was under the City's control.

The City touted the Report and its mitigating effects in its briefs. The Hillside Federation won the first round of the legal process, but the City prevailed in the appellate court in 2001 based on their reliance on the Infrastructure Report.

Note that the City coincidentally stopped doing anything called the Infrastructure Report right after they won the appellate case. Ironically, the precise impacts predicted by the Hillside Federation have come to pass specifically because the City failed to implement the mitigation that was to have mitigated the impacts.

What did the City argue in its case against Hillside Federation? They stated: "*Other alternatives were rejected because there weren't land use distribution policies or triggering mechanisms to time growth to infrastructure*." They also stated

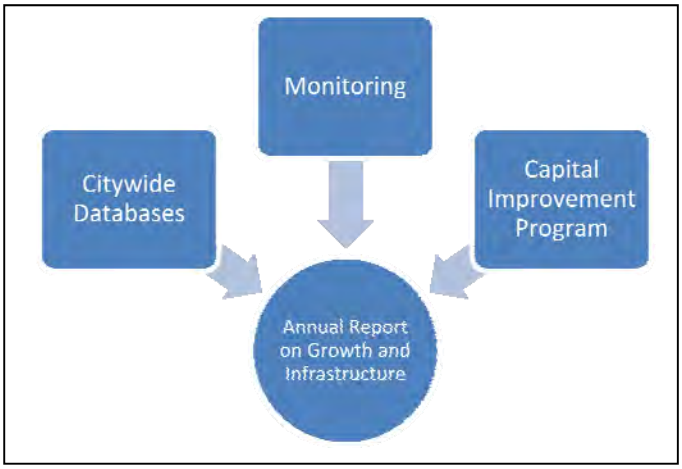
that the alternative ultimately selected was particularly helpful because it informed the City that a triggering mechanism should be included so that increases in density "*would not occur until infrastructure and its funding was available*."

Finally, they made the case that the City's use of the Infrastructure Report was critical. They said "*What became clear was that a crucial feature of dealing with growth impacts was contained in the General Plan – its program for timing allowable development with available infrastructure…*"

We are where we are now, with crumbling water pipes, depleted fire service and crushing traffic because the City did not heed its own advice and keep its own promises

The Infrastructure Mitigation – What is it?

The Infrastructure Mitigation was designed to be the mitigation that protected the City from developing beyond its means. The Annual Report was the document that City officials and the public use to determine if development should or should not be controlled.



The Annual Report is supposed to synthesize data from City and other non-City databases, monitoring programs, growth, population and resource availability into an easily accessible and understandable tool to determine whether or not the infrastructure can withstand more development.

Ultimately, the public's quality of life, the City's livability and the City's ability to provide basic public safety functions depend on whether or not the City can afford to put more demands on its infrastructure.

The Report is supposed to synthesize vast amounts of raw data into policy-level analysis and actionable findings. Based on the City's own statements and community plans, the Infrastructure Report is to determine whether any infrastructure element is threatened. This process includes determining triggers or thresholds which indicate an infrastructure element is threatened and then comparing actual conditions to the trigger levels.

As described by the City, it is a:

> "…mechanism for ' ... regulating the type, location, and/or timing of development, when ... additional infrastructure and services have been provided, and there remains inadequate public infrastructure or service to support land use development (Policy 3.3.2[d]).' to respond to such impacts."

What it is not: As the Fix The City lawsuits have progressed, the City has tried to confuse the courts by claiming that over 60 distinct websites containing over 15,000 pages of raw data from disparate Citywide databases, capital improvement budgets and monitoring data is the required Infrastructure Report[4]. They couldn't be more clearly wrong – and they know it.

First, simply acquiring raw data has no mitigating effect. Similarly, issuing findings without then acting on those findings has no mitigating effect. That's just simple logic. However, some might want to see the proof in writing.

[4] . The City presented the court with 60 website links (some broken) to over 15000 pages of raw data and claimed that it represented the Infrastructure Report.

Fortunately, the City has provided that proof. They clearly listed four elements as separate and distinct. Those elements are a 1) monitoring program, 2) a Citywide environmental database, 3) capital improvement programs and 4) the Infrastructure Report.

The description of the Infrastructure Report provided by the City clearly indicates that the Infrastructure Report contains data FROM the monitoring program and therefore is not the same as the monitoring program.

The Infrastructure Mitigation is NOT a discretionary policy that can be ignored. We know this because the City said so. In response to a question about the City's commitment to implementing the mitigation(by a different City agency – the Bureau of Engineering), the City revised the EIR to state:

> "The Mitigation Measures defined by this EIR in many instances encompass the policies contained in the proposed General Plan Framework. This fulfills the legislative intent for general plans and the CEQA process stipulating that 'mitigation measures developed through the environmental review process can and should serve as the basis for policies and implementation measures: **The inclusion of policies as environmental mitigation measures acknowledge the role that has been defined by the State specifying that a general plan's policies represent a 'clear commitment of the local legislative body for implementation**: For these reasons; **the policies defined as mitigation measures are assumed by the DEIR to be fully implemented**. In the event that budget limitations or other factors prevent their full implementation, the failure to effectuate the policy and corresponding implementation program(s) may represent a significant impact. The proposed project establishes a potential mechanism for ' ... regulating the type, location, and/or timing of development, when ... additional infrastructure and services have been provided, and there remains inadequate public infrastructure or service to support land use development (Policy 3.3.2[d]).' to respond to such impacts."

The Infrastructure Mitigation – How is it to be used/How is it supposed to work?

The Infrastructure Mitigation is to be used as the mitigation/check and balance on development and the infrastructure.

Numerous community plans spell out the very precise way the Infrastructure Mitigation is supposed to function.

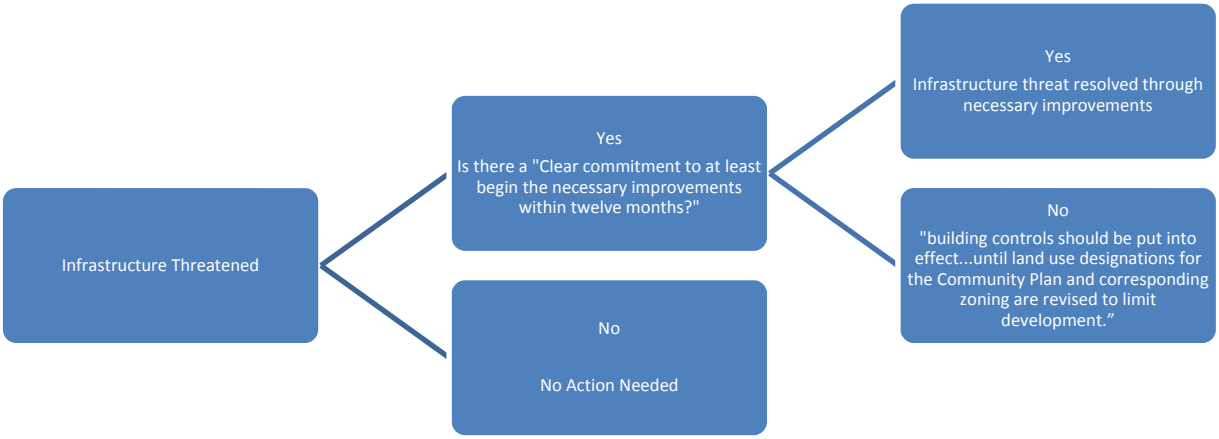
A determination is made if any infrastructure element is threatened through the Annual Report on Growth and Infrastructure.

Pursuant to Public Resources Code §21081.6, the general plan must incorporate the approved mitigation measures identified in the EIR into its policies and plan proposals.

If it is, the City has a choice: Confirm that the resources exist to eliminate the threat within 12 months or put building controls in place. It's that simple. The actual language from the City is:

> *"…if this monitoring finds that population in the Plan area is occurring faster than projected; and, that infrastructure resource capacities are threatened, particularly critical ones such as water and sewerage; and, that there is not a clear commitment to at least begin the necessary improvements within twelve months; then building controls should be put into effect, for all or portions of the West Los Angeles Community, until land use designations for the Community Plan and corresponding zoning are revised to limit development."*

The Infrastructure Report Mitigation Process



One of the best ways to explain how the Infrastructure Report is supposed to function is by way of an example.

Assume you are driving in a car. Are you breaking the speed limit? You can't know as your speed and the limit are not known.

Now you are told you are going 55 mph. Are you breaking the speed limit? You can't be sure. Though you are monitoring your speed, you do not know the limit.

Now you are told the limit is 35 MPH. Are you breaking the speed limit? Yes. Your monitoring is providing you with your current speed. The speed limit provides a trigger level which result in a conclusion that you are breaking the speed limit.

Does this knowledge constitute mitigation of the violation? No. Only tapping the brake and/or easing off of the accelerator will bring you into compliance with the limit.

Now assume you are going 35 MPH. Are you at risk of violating the speed limit? You can't know as there is no trend line data to inform you.

Now you are told you happen to be going down a hill and your previous speeds over the last minute were 20, then 25, then 35. The trend line and knowledge of the context of your situation would indicate that you are at risk of exceeding the limit and that action is necessary to mitigate the risk/threat. This is the precise mechanism the City approved as its mitigation.

This is what the Infrastructure Mitigation is supposed to do for the City. If development is outpacing the infrastructure, then the City is supposed to hit the brakes. Unfortunately, in the absence of the Infrastructure Report, the City doesn't know how fast its going, doesn't know the speed limit, has no context or trend line and doesn't even own a brake pedal.

Reliance on the Infrastructure Report /Interdependency of General Plan Elements

How important is the Infrastructure Report to the planning process? The best answer is to see how many other planning policies and key documents rely on the Infrastructure Report for its mitigating effect. The Infrastructure Report is specifically cited by virtually every element in the General Plan, including the Fire/EMS section and even the newly adopted Housing Element.

The Housing Element, updated in 2008, depends heavily on the Infrastructure Report. It states:

> *The Mitigation Monitoring Program was adopted by the City Council on December 11, 1996, in conjunction with the adoption of the Los Angeles General Plan Framework Element, its accompanying Final Environmental Impact Report (FEIR No.199407 1030) and Statement of Overriding Considerations. The Mitigation Monitoring Program is required by Section 21081.6 of the California Public Resources Code.*
>
> *Pursuant to Government Code Section 65103(c), local officials must implement the adopted plan and the policies and programs it contains. The Mitigation Monitoring Plan consists of two annual reports to the City Council.*
>
> *COMPONENT 1. The first component is the Annual Report on Growth and Infrastructure which presents the amount and distribution of actual growth of population and residential, commercial, and industrial land uses; growth in households; growth in jobs to the extent that this information is available; the actual capital investment funds allocated to infrastructure projects; and other factors directly related to growth. This allows the City to compare actual growth in the City with projections and to identify trends and the need for updated projections and/or estimates for population, land use, jobs, and housing units.*

The Transportation Element clearly cites the Infrastructure Report as the means by which it will communicate progress. It states that the Transportation Element evaluation report will be prepared by the City Planning Department every two years for inclusion in the Framework Annual Report on Growth and Infrastructure.

The Land Use Element/Community Plans rely heavily on the Infrastructure Report to provide the essential triggering mechanism for when building controls should be put into place. Multiple community plans have this language:

> *"…if this monitoring finds that population in the Plan area is occurring faster than projected; and, that infrastructure resource capacities are threatened, particularly critical ones such as water and sewerage; and, that there is not a clear commitment to at least begin the necessary improvements within twelve months; then building controls should be put into effect, for all or portions of the West Los Angeles Community, until land use designations for the Community Plan and corresponding zoning are revised to limit development."*

The City even cited the Infrastructure Report in seeking federal money[5] *($168M through the CDD this year)*

> City of Los Angeles, Consolidated Annual Performance and Evaluation Report, Program 2003-2004
>
> **SECTION VIII OTHER ACTIONS *continued***
>
> **ENSURING COMPLIANCE WITH PROGRAM AND COMPREHENSIVE PLANNING REQUIREMENTS**
>
> A system for the annual monitoring of growth, infrastructure, and services, used as the basis to guide future capital investments and development decisions, will also be used as a mechanism to gauge the appropriateness of the estimates and provide for their modification over time.
>
> - Prepare and submit to the City Council an Annual Report on Growth and Infrastructure, based on information compiled by the monitoring program;
> - Establish procedures for City agencies to coordinate the provision of services and infrastructure to support growth;

Accurate monitoring and reporting also played a large part in the City's ability to avoid legal action by the U.S. EPA. In its case for preparing the new General Plan, the City stated: "*Furthering the need to prepare a new plan is the mandate of the United States Environmental Protection Agency (EPA) which requires the City of Los Angeles to update its General Plan to make it consistent with the Regional Air Quality Management Plan."*

It is critical to note that the City's current argument that the Infrastructure Report is not required is not only inconsistent with past arguments, but would place the entire General Plan in a state of inconsistency as other General Plan elements rely on the Infrastructure Report to inform the Infrastructure Mitigation process. General Plan elements that rely on the Infrastructure Mitigation for as their mitigation would impermissibly be relying on a contingent mitigation lacking a "clear commitment" on the part of the City to implement the mitigation.

[5] http://cdd.laCity.org/pdfs/caper/VIII_ensure.pdf

An inconsistent General Plan is contrary to State law. In fact, the City stated requirements for consistency in its General Plan. It says:

> *"According to State Government Code (Sec. 65300.5), all elements of the general plan must be consistent with each other. This internal consistency requirement has several important implications for the structure and content of the General Plan. First, it establishes that all elements of the General Plan have equal legal status. "*

Goal of the suit

The goal of Fix The City's lawsuits: We are seeking no more or less than promised and required by law.

The City cannot be fixed if developer-driven planning is allowed to deplete City infrastructure and services. Further, in the absence of a clear and objective means to measure Citywide cumulative environmental impacts of projects, each developer is free to establish their own self-serving impact thresholds.

In one of the most forthright evaluations of how the City of Los Angeles really works, from Playa Vista to Staples to the La Brea Gateway and beyond, Los Angeles County Supervisor Yaroslavsky made the following observations:

> "*Planning is not being done by the City but by the developer interests."* and
> *"The development community believes they can get anything they want."*

It wasn't supposed to be this way. This is not what the City promised during its General Plan revision process, nor is it what the City is legally committed to do with regard to the Infrastructure Mitigation. Development Approvals should be based on the City's ability to provide the necessary infrastructure and services to its citizens, not on developer's ability to get what they want.

Fix The City Goal - Implement the Infrastructure Mitigation by:

- Establishing minimum service thresholds for each infrastructure element;
- Establishing objective criteria for when an infrastructure element is threatened. For example, the City would need to take into account the time it takes to train new firefighters or police officers to make sure they have enough when they need them;
- Performing uniform and regular monitoring;
- Consolidating the data to establish current levels of infrastructure capacity;
- Comparing actual findings to trigger levels and threat criteria;
- Making a finding that it can or cannot make a clear commitment to begin necessary improvements to eliminate the threat to the infrastructure;
- Preparing an Annual Report on Growth and Infrastructure that includes the above; and then
- Implementing building controls if the infrastructure is threatened AND the City does not have the resources to eliminate the threat.

Importance to the Community

The importance of Fix The City lawsuit cannot be overstated. If the City is forced to implement the promised and required mitigation the community will have an objective process for deciding when, where and if development should occur. The community will also be able to cite the Infrastructure Report(s) should the City attempt to put in place density-increasing or infrastructure-depleting ordinances or policies. Most importantly, it will provide consistency and certainty for all involved by creating an objective set of criteria for development tied to actual infrastructure capacity.

Fix The City is represented by Doug Carstens of Chatten-Brown & Carstens. Information requests should be sent to Info@FixTheCity.Org.

For updates on the Fix The City, go to www.InfrastructureCoaltion.Org.

Exhibits/References

Letter from then Assemblyman Antonio Villaraigosa….

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Assembly
California Legislature

ANTONIO VILLARAIGOSA
ASSEMBLYMEMBER, FORTY-FIFTH DISTRICT

BD

April 25, 1995

Ann Siracusa
Principal Planner
Citywide Planning Division
Department of City Planning
221 South Figueroa St., Rm 410
Los Angeles, CA 90012

Dear Ms. Siracusa:

RE: CPC 94-0354; Draft General Plan Framework Element

I'm writing to offer my comments on the Draft General Plan Framework Element currently in circulation.

Overall, I am impressed with the level of detail and specificity written into this document. However, I question whether the Framework realistically deals with the major land use issues facing our city. I also question whether it reflects the nature of the public input gathered at community meetings and charrettes in 1992 and 1993. My observations tell me it does not.

This latter point is important because a root cause of the "disconnect" that exists between the government, the development community and the general public is the public's feeling that it does not have a meaningful role in the process. This leads to a politicization of the planning and permitting process. That, in turn, leads to the kind of erratic, project-based planning that aggravates everybody involved. Projects are invariably fought out through a series of hearings, with a few then going to court. The bold effort the City is making to reduce the number of hearings will only serve to enflame the situation if the public is not comfortable with the land use plans and regulations upon which projects are based. BD-1

There clearly has been a change of land use philosophy in City Hall since the Framework process began, and it shows in the draft plan. I do not believe the this document includes much of the public input you gathered. Rather, the Economic Development element has become the driving force of the plan. The political and environmental aftermath from the city's economic development-oriented land use experiences in the '70s and '80s should remind us of the need to be cautious regarding such an approach.

I have some basic concerns:

1. **Mobility and Economic Development:** As a former Metropolitan Transportation Authority boardmember, I am acutely aware of the relationship between land use patterns and mobility. As a city, we seem to be incapable of seriously addressing our mobility problems, despite the rhetoric and the dollars spent. Our highly developed neighborhoods are very congested and even the substantial investment we are making in rail transit will not change that.

The Framework's effort to create "Community Centers" throughout the city opens the door to more congestion. This is especially true if these Centers are not fine-tuned so as to ensure that a full mix of housing is included in any future development which takes advantage of the allowable height and density. BD-2

There is language in the Economic Development section encouraging the development of revenue generating uses and a drive toward simplifying the permit process. This suggests a real possibility of further over-concentrations of commercial development. This will have negative mobility and environmental consequences. At the same time, it does not guarantee any kind of systematic, sustainable economic benefit. Instead, it's simply back to "business-as-usual." That didn't lead to workable development patterns or a stable economic or ecological environment in the past and I doubt it will do so in the future. BD-3

2. **Housing Affordability and Density:** With regard to the housing section, I am relieved to see an acknowledgement of the need for appropriate, affordable housing for the city's changing population. However, I find the affordable housing incentives offered to be vague. I understand that the General Plan Housing Element, the Comprehensive Housing Affordability Strategy and the community plans are the most likely repositories for the specifics. BD-4

I urge the Department to develop aggressive strategies to generate affordable units in a variety of contexts in every neighborhood. This should include incentives requiring affordable units in both mixed-use commercial and residential projects receiving density bonuses. For example, I do not believe projects in Community Centers should be permitted to be more than four stories high unless they feature a substantial affordable component.

3. **Community Center Heights:** As noted above, I am concerned about the height allowances in the Community Center designation. I believe this proposal will, in general, permit out-of-scale development in many of the neighborhoods in which it is proposed to be applied. In the 45th Assembly District, which I represent, the two Community Center designations along North Figueroa in Highland BD-5

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Park are problematic. They also threaten a number of historic buildings by providing a major economic incentive for random redevelopment on a lot-by-lot basis.

Department staff has informed me that the provisions of the draft Northeast Community Plan, if ultimately adopted, will prevail over Framework recommendations. That is reassuring because I believe that Plan more closely reflects the desires of the people who live and work in the community. This relationship should be replicated with regard to all community and district plans as they relate to the Framework. BD-5

4. Floor-Area Ratio: I note that the Framework calls for noteworthy increases in allowable floor-area ratio (FAR) in many locations. This is in direct conflict with Proposition U, resoundingly approved by the voters a few years ago. The erosion of Proposition U's 1.5:1 FAR for most commercial properties is perhaps the Framework's most objectionable provision. BD-6

Keep in mind that the average built FAR in Los Angeles is very low, possibly below .5:1. The idea that we can accommodate even the tripling of density already permitted by 1.5:1 FAR is far-fetched. For the Framework to go even further is quite unrealistic and bad public policy.

I plan to continue monitoring the progress of the Framework as it continues through the City's approval process and look forward to further opportunities to comment on its contents.

Very Truly Yours,

ANTONIO R. VILLARAIGOSA
Assemblymember, 45th District

ARV/jb

cc: Hon. Hal Bernson
Hon. Richard Alatorre
Hon. John Ferraro
Hon. Jackie Goldberg
Hon. Mike Hernandez

General Plan – Executive Summary – Page 2 (000008)

At the same time, the population and employment estimates do not represent maximum or minimum levels of growth to be permitted. A system for the annual monitoring of growth, infrastructure, and services, used as the basis to guide future capital investments and development decisions, will also be used as a mechanism to gauge the appropriateness of the estimates and provide for their modification over time.

General Plan – Executive Summary – Page 7 (000013)

For each of the public services and infrastructure systems, four basic policies are defined by the Framework Element: Monitor levels of demand and the abilities of the service/infrastructure system to support demands. Use these demands to forecast future needs and improvements.

General Plan – Executive Summary – Page 7 (000013)

Implementation Programs
A diversity of programs are specified to implement the General Plan Framework Element's policies. Their timing is contingent on the availability of adequate funding. Key programs include the following: Establish a program to monitor growth and public service and infrastructure demands and capacities. Prepare and submit to the City Council an Annual Report on Growth and Infrastructure, based on information compiled by the monitoring program. • Amend the community plans and the zoning ordinance (Municipal Code), guided by the Framework Element's policies and standards. • Formulate master and financing plans for public services and infrastructure that are correlated with forecast population and employment growth.

General Plan – Page 1-2 (000017)

Implementation is made more effective through citywide monitoring of growth trends and infrastructure capacity. Public participation will ensure the responsiveness and relevance of the community plans that, over time, will be updated as a strategy for implementing the Framework Element. An annual report to the City will provide an opportunity to make policy adjustments as necessary in light of changing circumstances.

General Plan – Page 1-3 (000018)

Changes to the law over the past twenty years have vastly boosted the importance of the general plan to land use decision-making. A general plan may not be a "wish list" or a vague view of the future but rather must provide a concrete direction. In essence, the general plan is a "constitution for development," the foundation upon which all land use decisions in a city or county are to be based. It expresses community development goals and embodies public policy relative to the distribution of future land use, both public and private.

General Plan – Page 1-6 (000021)

The Framework Element sets forth a conceptual relationship between land use and transportation on a citywide basis and defines new land use categories which better describe the character and function of the City as it has evolved over time. In addition, it sets forth an estimate of population and employment growth for a 15 to 20 year time period that can be used to guide the planning of infrastructure and public services. This, however, does not represent a limit on growth or a mandated level of growth in the City or its community plan areas. Traditionally, such "end-state" limits have proven ineffective in guiding growth and public infrastructure and service investments and in responding to the changing needs of a city's residents and its economy. In its place, the Framework Element establishes a program to annually monitor growth, its impacts, and infrastructure and service needs that will be documented in a report to the City Council and pertinent service departments and agencies. This will provide decision makers and planners with the information that is essential in shaping growth in a manner that can mitigate its impacts, minimize development costs, conserve natural resources, and enhance the quality of life in the City.

General Plan – Page 1-6 (000021)

MONITORING AND REPORTING

The Department of City Planning will develop and implement a growth Monitoring System and annually prepare a Report on Growth and Infrastructure to the Mayor, City Council, and the City Planning Commission. The Annual Report on Growth and Infrastructure will include policy and program recommendations and summary information generated by the Monitoring System on the City's changing circumstances, needs, and trends.

General Plan – Page 1-7 (000022)

INTERNAL GENERAL PLAN

According to California State Government Code Section 65300.5, a general plan must be and internally consistent, both among the elements and within each element. Elements adopted by the City as well as the mandatory elements. The internal consistency requirement also applies to the community plans which collectively comprise the City's Land Use Element. All principles, goals, objectives, policies, and plan proposals set forth in the general plan must be internally consistent. All adopted elements have equal status and no element may be made subordinate to another.

General Plan – Page 1-9 (000024)

8. Annual Review

The Department of City Planning shall annually review the need to comprehensively update the citywide elements, including the Framework Element and the community plans. The results of this annual review shall be reported to the City Planning Commission, the City Council, and the Mayor through the Annual Report on Growth and Infrastructure. This report shall recommend which citywide element or community plan should be updated and why. These recommendations shall be based on an evaluation of changing circumstances, and other information provided by the Monitoring System.

General Plan – Page 1-9 (000024)

9. General Plan Preparation, Revision, and Update Program

The Department of City Planning has established a program to comprehensively update general plan elements and community plans to implement the goals, policies, and objectives established in the Citywide General Plan of funding, all comprehensive updates of the citywide elements and the community plans for the purpose of implementing the Framework Element shall be initiated within five years of adoption of the Framework Element. Phasing of such updates may be made in accordance with Objective 3.3. and Policies 3.3.1 and 3.3.2 based on the monitoring of population, development, and infrastructure and service capacities as recommended through the Annual Report on Growth and Infrastructure.

General Plan – Page 2-1 (000026)

The estimates are not intended to represent maximum or minimum levels of development to be permitted. Rather, they will be monitored annually as a basis for the implementation of infrastructure and services to support growth. Based on the monitoring, the "horizon" may be adjusted to reflect the actual levels of growth and their impacts and demands on infrastructure and public services. At a minimum, the "horizon" must be reviewed and updated as the population and employment forecasts and/or 2010 are approached.

General Plan – Page 2-3 (000028)

GROWTH MONITORING

After the Framework Element is adopted, the City will establish a growth monitoring program that will provide important information regarding the accuracy of future growth estimates and the distribution of that new development by community plan area. This monitoring program will annually document what has actually happened to the City's population levels, housing construction, employment levels, and the availability of public infrastructure and public services. Information on environmental conditions will also be monitored on a yearly

basis to maintain and update an environmental database, which will be used to facilitate but not replace, environmental review for subsequent programs and projects in accordance with CEQA.

General Plan – Page 2-3 (000028)

The information from such a monitoring system will be presented to the City Council in the form of an Annual Report on Growth and infrastructure, which can be used as the basis for revision of policies as needed to meet the goals of the Framework Element. The status of environmental mitigation requirements can also be determined and policies can be changed if desired results are not being obtained. Information on amounts and location of growth can be provided and policies influencing this growth can be revised if needed. In this fashion, the Framework Element can be continually updated to meet changing conditions, and the implementation mechanisms revised or altered to achieve the desired goals. SCAG will require monitoring in all its subregions in a similar manner.

General Plan – Page 2-3 (000028)

Should population and employment growth be greater than the levels anticipated by the Framework Element, policy stipulates that studies be undertaken to correlate with the necessary supporting capital, facility, or service improvements and/or demand reduction programs. At the same time, the impacts of the additional level of growth must be found to be consistent with the findings of the Environmental Impact Report regarding their level of significance. Should additional potential impacts be identified, these would be subject to further environmental review in accordance with the CEQA. This would be facilitated by the implementation of a program to monitor the characteristics and impacts of growth and availability of infrastructure and public services (the "Monitoring Program") and annual reporting of this information to the City Council (the "Annual Report on Growth and Infrastructure") as a basis for the planning and funding of necessary improvements.

General Plan – Page 3-1 (000032)

To facilitate growth in those areas in which it is desired, the Land Use Policies provide for the (1) establishment of a process to expedite the review and approval of development applications that are consistent with the Framework Element and community plans, (2) the implementation of infrastructure and public service investment strategies, and (3) a program to monitor growth and infrastructure and public service capacity and report their status annually to the City Council.

General Plan – Page 3-15 (000046)

3.3.2 Monitor population, development, and infrastructure and service capacities within the City and each community plan area, or other pertinent service area. The results of this monitoring effort will be annually reported to the City Council and shall be used in part as a basis to:

a. Determine the need and establish programs for infrastructure and public service investments to accommodate development in areas in which economic development is desired and for which growth is focused by the General Plan Framework Element.

b. Change or increase the development forecast within the City and/or community plan area as specified in Table 2-2 (see Chapter 2: *Growth and Capacity*) when it can be demonstrated that (1) transportation improvements have been implemented or funded that increase capacity and maintain the level of service, (2) demand management or behavioral changes have reduced traffic volumes and maintained or improved levels of service, and (3) the community character will not be significantly impacted by such increases.

Such modifications shall be considered as amendments to Table 2-2 and depicted on the community plans.

c. Initiate a study to consider whether additional growth should be accommodated, when 75 percent of the forecast of any one or more category listed in Table 2-2 (see Chapter 2: *Growth and Capacity*) is attained within a community plan area. If a study is necessary, determine the level of growth that should be accommodated and correlate that level with the capital, facility, or service improvements and/or transportation demand reduction programs that are necessary to accommodate that level.

d. Consider regulating the type, location, and/or timing of development, when all of the preceding steps have been completed, additional infrastructure and services have been provided, and there remains inadequate public infrastructure or service to support land use development.

(P42, P43)

General Plan – Page 9-6 (000129)

2. *How will the City identify where, when, and how many improvements are needed for infrastructure and public service systems?* Los Angeles needs consistent information concerning its infrastructure and public service systems, for effective capital investing. The City therefore needs to maintain up-to-date inventories of all its systems; computer models capable of evaluating the impacts of proposed projects on City-owned infrastructure; regular forecasts of each infrastructure system's needs, which can be used to guide capital improvement decisions; trigger mechanisms that can warn decision makers when and where future needs will occur; and reporting systems that enable the City to update its models. All of this information should be compiled in a Annual Report on Growth and Infrastructure, which will provide City staff, the City Council, and service providers with information that can facilitate the programming and funding of improvements or making decisions when to take other actions.

General Plan – Page 10-1 (000146)

While in excess of 60 programs are described, the following summarizes the principal programs that are essential in carrying out the policy direction of the Framework Element:

A program to monitor the status of development activity, capabilities of infrastructure and public services to provide adequate levels of service, and environmental impacts (e.g., air emissions), identifying critical constraints, deficiencies and planned improvements (where appropriate) (P42). • An Annual Report on Growth and Infrastructure that documents the results of the annual monitoring program (P43).

General Plan – Page 10-18 (000163)

P42 Establish a Monitoring Program to accomplish the following:
a. Assess the status of development activity and supporting infrastructure and public services within the City of Los Angeles. The data that are compiled can function as indicators of (a) the rate of population growth, development activity, and other factors that result in demands for transportation, infrastructure, and services; (b) location and type of infrastructure investments and improvements; and (c) changes to the citywide environmental conditions and impacts documented in the Framework Element environmental database and the Environmental Impact Report.

b. Assess transportation conditions and determine the City's progress toward attainment of citywide transportation objectives.

c. Determine the progress of the Los Angeles County Sanitation District 2010 Master Facilities Program and any other capital improvement projects which could affect their ability to collect City wastewater and provide full secondary treatment for that wastewater.

d. Identify existing or potential constraints or deficiencies of other infrastructure in meeting existing and projected demand.

e. Identify, based on consultation with the LAUSD, the surplus and/or deficit of classroom seats.

Responsibility: Department of City Planning, LADWP, Public Works, Fire and Police
Funding Source: General Fund, Power Revenue Fund, development fees, Sewer Constructionl Maintenance (SCM), Federal funds and other funding sources
Schedule: Within one year of Framework Element adoption

P43 Prepare an Annual Report on Growth and Infrastructure based on the results of the Monitoring Program, which will be published at the end of each fiscal year and shall include information such as population estimates and an inventory of new development. This report is intended to provide City staff, the City Council, and service providers with information that can facilitate the programming and funding of capital improvements and services. Additionally, this report will inform the general plan amendment process. Information shall be documented by relevant geographic boundaries, such as service areas, Community Plan Areas, or City Council Districts.
Responsibility: Department of City Planning in consultation with City departments
Funding Source: General Fund and other appropriate sources
Schedule: At the end of the fiscal year

Major Projects Sketch Plan – DCP, January 1993 (000180)

Product - Growth Monitoring

The recommended system will work to the extent that a monitoring program is developed that provides comprehensive and reliable information on where growth is occurring and where infrastructure capacity exists so that action can be taken in the form of a phased program of public investments. Changes in the physical condition of the City must be recorded and tracked. The objective here is to create a procedure that enables the City of Los Angeles to link its General Plan policies with the process used to make decisions concerning the location and type of capital improvements.

Opposition brief of COLA Case#BS042964 (000194)

The Notice of Completion, the GPF and DEIR described seven programs to implement the GPF subsequent to its adoption: a Monitoring Program, an Annual Report on Growth and Infrastructure, a Capital Improvement Program, a Transportation Improvement and Mitigation Program (TIMP), a Community Plan Update Program, Planning and Zoning Code Amendments, and a program of new and amended Plan Elements. (Pub.Res.Code Section 21081.6 also requires monitoring program, which was adopted at the time of GPF approval. (1 AR 26).

Opposition brief of COLA Case#BS042964 (000199)

A crucial part of the GPF is its on-going monitoring program to update the data and assumptions underlying the policies and programs in the GPF. (2 AR 284-285). It is a "program to monitor the status of development activity, capabilities of infrastructure and public services to provide adequate levels of service, and environmental impacts (e.g., air emissions), identifying critical constraints and deficiencies and planned improvements (where appropriate) (P42)" (2 AR 285 [summary]; 2 AR 303-304 [GPF required contents of program]). This monitoring calls for an Annual Report on Growth and Infrastructure (2 AR 285)which will be used to modify GPF and EIR assumptions and serve as the basis for evaluating the effectiveness of the GPF objectives, policies, programs, and mitigation measures. (2

Opposition brief of COLA Case#BS042964 (000206)

Fifth, even if all parts of the TIMP implementing program were dependent upon funding, and even if funding was the sole determinate of feasibility, the GPF and DEIR called for many implementing programs and mitigation measures other than those in the TIMP. A crucial aspect of the entire GPF was (1) its monitoring program which provides the methods by which substantive decisions on how and when to adjust densities based on updated information and progress reports reporting past performance and current status, and (2) its intent to modify the location and arrangement of different land uses to effectuate its various policies.

Opposition brief of COLA Case#BS042964 (000210)

Finally, petitioners attack as "infeasible by definition" (POB 12:1) the fifth alternative - the long range build out of the GPF use categories without the triggering mechanisms to tie infrastructure to new development. (If this was "infeasible by definition", then the inclusion of this definition in the DEIR which was circulated for four months in early 1995 should have triggered some sort of written objection during the public comment period from petitioners or others, for that matter.) This alternative was particularly helpful because it informed the City that a triggering mechanism should be included in the GPF so that allowable increases in density through community plan amendments would not occur until infrastructure and its funding was available.

Opposition brief of COLA Case#BS042964 (000211)

What became clear was that a crucial feature of dealing with growth impacts was contained in the GPF - its program for timing allowable development with available infrastructure and frequent updating of its data along with a formal monitoring program. For this reason, the City concluded that the GPF was the environmentally desirable alternative, because it had the best combination of land use policies tied to mitigation measures tied to annual reporting and selective amendments of community plans only when consistent with the GPF policies. (1 AR 77-78 [findings adopted by City Council explaining why GPF was environmentally superior alternative]).

General Plan Monitoring and Mitigation Program (000245)

THE GENERAL PLAN FRAMEWORK ELEMENT
MITIGATION MONITORING PROGRAM

May 7, 1996

In compliance with Section 2181.6 of the California Public Resources Code, public agencies approving projects which have the potential to cause significant environmental impact must adopt a Reporting and Monitoring Program or require changes to the proposed project which mitigate or avoid the significant impacts. While the General Plan Framework Element the City's General Plan incorporates policies and programs to mitigate most environmental impacts, Environmental Impact Report # 94071030 identifies some cases in which proposed policies and programs does not sufficiently mitigate significant environmental impacts, should the city's population continue to increase as forecast. In those cases, additional mitigation measures were recommended and those adopted are included in this action. Pursuant to Government Code Section 65103(c), local officials must implement the adopted plan and the policies and programs it contains. The Mitigation Monitoring Plan consists of two annual reports to the City Council.

COMPONENT 1. The first component is the *Annual Report on Growth and Infrastructure* which presents the amount and distribution of actual growth of population and residential, commercial, and industrial land uses; growth in households; growth in jobs to the extent that this information is available; the actual capital investment funds allocated to infrastructure projects; and other factors directly related to growth. This allows the City to compare actual growth in the City with projections and to identify trends and the need for updated projections and/or estimates for population, land use, jobs, and housing units.

COMPONENT 2. The second component is an *Annual Report on Status of the General Plan Implementation Programs*. This report will be compiled by monitoring and evaluating the status of each implementation program and additional mitigation measure, and comparing this information with component one. If appropriate, the status report will recommend any modifications that appear necessary to adjust the Framework Element (or any of the programs) in order to achieve the results desired.

General Plan EIR Page 1-2 (000262)

Based on these considerations, it is the intent of the General Plan Framework to: Establish a short-term estimate of population growth that can rationally be used for the planning and funding of infrastructure and services; to support growth and encourage patterns of development which reduce potential environmental impacts such as traffic congestion and air emissions; and to improve the quality of life for the City's residents. Recognizing that the demands and impacts of growth may vary due to changing characteristics of the population and technologies, it is the intent of the Framework to set in place a system to monitor and annually report growth demands and impacts as the basis for the implementation of strategies for their accommodation.

General Plan EIR Page 1-3 (000262)

The Department of City Planning will develop and implement a growth Monitoring System and annually prepare a Report on Growth and Infrastructure to the Mayor, City Council, and City Planning Commission. The Annual Report will be generated by the Monitoring System regarding the characteristics, impacts, and needs of growth.

General Plan EIR Page 1-7 (000266)

3. A comprehensive planning and implementation program, including:
   a. Planning Processes and Reporting
      (1) Monitoring Program

      Assessment of the status of development activity within and outside of the Framework's targeted growth areas. Data will function as an indicator of the (1) rate of population growth, development activity, and other factors affecting infrastructure demands, (2) location and type of new infrastructure investments, and (3) changes to the citywide environmental data base and CEQA-related cumulative impact information.

      (2) Annual Report on Growth and Infrastructure

      This report will document (1) the amount of growth during the previous year, (2) its effects on the capacities of Los Angeles' public infrastructure and services, as measured by the Monitoring Program, and (3) estimates of future near-term population growth. It is the intent of the Report to provide City staff, the City Council, and service providers with information that can facilitate the programming and funding of improvements and/or serve as the basis for the management of growth when deficiencies occur.

      (3) Citywide Environmental Data Base

      Information regarding the status of environmental resources, infrastructure, and services, as documented in the Framework Technical Background Report (Volumes II, IIIA, and IIIB) and impacts defined by the Environmental Impact Report.

      (4) Capital Improvement Program

      Continued implementation of a five year CIP that is updated annually. It would use information derived from the Monitoring Program to aid in the determination of projects that should be included; including consideration of the prioritization of improvements in areas in which growth is targeted by the Framework.

General Plan FEIR/Proposed Statement of Overriding Considerations Page 5 (000273)

The Framework Element includes an on-going monitoring program to update the demographic forecasts that underpin the plan and its Environmental Impact Report (EIR). The monitoring system will result in the issuance of an Annual Report on Growth and Infrastructure which will be used to modify plan and EIR assumptions and serve as the basis for evaluating the effectiveness of the Framework Element's objectives, policies, programs, and mitigation measures.

General Plan FEIR/Proposed Statement of Overriding Considerations Page 19 (000287)

J. POLICE

1. Impacts

The amount of population, employment, and housing growth that the Framework Element permits by policy could result in a significant increase in the demand for police protective services as compared to existing baseline levels (1990). Based on the planning ratio standard used to determine the adequacy of the supply of sworn officers, a total of 17,673 officers would be needed to adequately accommodate the City's 2010 average day/night population. This is in comparison to the 8,817 sworn officers that were on the force as of 1990.

These impacts are potentially significant.

2. Mitigation Measures

The Framework Element's economic development policy targets an employment base that exceeds SCAG's jobs forecast to maintain the City's 1990 jobs/housing ratio through the year 2010. This increased economic base will provide additional revenue necessary to pay for added police protective services. Additionally, the Framework Element includes a policy that requires the City to correlate the type, amount, and location of development with the provision of adequate supporting infrastructure and public services.

General Plan FEIR/Proposed Statement of Overriding Considerations Page 38 (000306)

Proposed Revised Findings and Statement of Overriding Considerations

The Theoretical Buildout Alternative assumes buildout of the Framework Element without land use and managed development policies linking growth with infrastructure capacity. Under this alternative, there would be no trigger mechanisms available to generate additional review when infrastructure improvements are not able to keep up with the demands placed on them by new development.

General Plan FEIR/Proposed Statement of Overriding Considerations Page 38 (000307)

4. None of the alternatives fulfill the central objectives of the Framework Element. The No Project and Theoretical Buildout Alternatives permit development to exceed adequate infrastructure levels, contributing to reduced air quality and transportation impacts, in an automobile-oriented land use and urban form pattern that disperses development, thus endangering the character of low-density residential neighborhoods. These alternatives further lack policies that encourage quality development, walking, and transit use. The No Growth Alternative perpetuates a negative existing automobile-oriented pattern of land use and urban form, while reducing employment opportunities needed to revitalize economically disinvested neighborhoods and the revenue needed to provide adequate infrastructure. The 2010 Market Alternative also perpetuates a negative existing automobile-oriented pattern of land use and urban form, and provides inadequate employment opportunities given the level of projected population and housing.

General Plan FEIR/Proposed Statement of Overriding Considerations Page 41 (000309)

K. The Framework Element promotes the goal of adequate infrastructure systems and public services through a policy that seeks to correlate the type, amount, and location of development with the provision of adequate supporting infrastructure and public services.

San Pedro Community Plan Language Page 11-5 (000314)

PLAN MONITORING

The Plan has a land use capacity greater than the projected development likely to occur during the Plan period. During the life of the plan, growth will be monitored and reported in the City's Annual Report on Growth and Infrastructure which will be submitted to the City Planning Commission, Mayor, and City Council. In the fifth year following Plan adoption (and every five years thereafter), the Director shall report to the Commission on the relationship between population, employment, and housing growth and plan capacities. If growth has occurred faster than projected, a revised environmental analysis will be prepared and appropriate changes recommended to the Community Plan and zoning. These Plan and zoning changes shall be submitted to the Planning Commission, Mayor, and City Council as specified in the Los Angeles Municipal Code (L.A.M.C.).

1996 Annual Report on Growth and Infrastructure (000335)

November, 1996

To Members of the City Planning Commission, the City Council & the Mayor:

"Better public information leads to better public policies and decisions. This simple premise explains our intent in producing this first Annual Report on Growth and Infrastructure and in submitting it to you.

This report provides a snapshot of the City of Los Angeles in terms of demographic, economic, land use, infrastructure, public facilities and capital program data. This objective information has already been available from a wide variety of sources. The contribution of this document is to make that information comprehensive and comprehensible - comprehensive by assembling a wide range of pertinent data, and comprehensible by graphically portraying the data on a series of maps.

1996 Annual Report on Growth and Infrastructure (000338)

Background This and future reports will become part of a growth monitoring system being developed by the Department of City Planning. This effort is undertaken in compliance with the California Environmental Quality Act (CEQA) mitigation monitoring requirements. It is also a major component of the City's new General Plan Framework Element.

The Framework Element (Chapters 2 & 10) commits the Department of City Planning to develop a monitoring system and prepare an annual report on growth and infrastructure for public officials:

> A system for the annual monitoring of growth and infrastructure and services, used as the basis to guide future capital investments and development decisions, will also be used as a mechanism to gauge the appropriateness of the estimates (related to growth levels) and provide for their modification over time.... The Annual Report on Growth and Infrastructure will include policy and program recommendations and summary information generated by the Monitoring System on the City's changing circumstances, needs and trends

1998 Annual Report on Growth and Infrastructure (000448)

Executive Summary

This is the second edition of the Annual Report on Growth and Infrastructure *prepared by the Los Angeles City Planning Department. Based on data for the years 1994-96, the report presents an updated profile of the City's land use and socio-economic characteristics as well as information on public services and infrastructure. The preparation of this report fulfills a requirement of the General Plan Framework Element to monitor growth in population, employment and land use and to report on the adequacy of supporting public services and infrastructure.*

2000 Annual Report on Growth and Infrastructure (000610)

Executive Summary

This is the third edition of the *Annual Report on Growth and Infrastructure* prepared by the Los Angeles City Planning Department. Based on data for the years 1996-1998, the report presents an updated profile of information on public services and infrastructure. Specific information is also presented for each community in addition to the citywide data summaries. The preparation of this report fulfills a requirement of the General Plan Framework Element to monitor growth and to report on the adequacy of supporting public services and infrastructure.

2008 Housing Element Adoption

NOW, THEREFORE, BE IT RESOLVED, that the Housing Element (2006-2014) be adopted to replace the 1998-2005 Housing Element of the General Plan and that it be submitted to the California Department of Housing and Community Development for a determination of compliance with State law.

BE IT FURTHER RESOLVED, that the City Council:

1. Has considered the information in the Framework Element FEIR including comments received during the review period and responses to those comments;

2. Finds the Framework Element FEIR is adequate for the Housing Element (2006-2014);

3. Finds that none of the conditions described in CEQA Guidelines section 15162 to require a subsequent or supplement EIR to the Framework Element FEIR apply;

4. (a) Certifies that the Framework Element FEIR for the Housing Element (2006-2014) has been completed in compliance with CEQA; (b) Has reviewed and considered the information in the Framework Element FEIR for the Housing Element (2006-2014); and (c) Finds that the Framework Element FEIR for the Housing Element (2006-2014) reflects the City Council's independent judgment and analysis;

5. Finds that mitigation measures have been incorporated through the re-adoption of the Framework Element's Mitigation Monitoring and Reporting Program that avoid or substantially lessen the significant environmental effects identified in the Framework FEIR as specified in the Framework FEIR;

2008 Housing Element Mitigation Findings

The Mitigation Monitoring Program was adopted by the City Council on December 11, 1996, in conjunction with the adoption of the Los Angeles General Plan Framework Element, its accompanying Final Environmental Impact Report (FEIR No.199407 1030) and Statement of Overriding Considerations. The Mitigation Monitoring Program is required by Section 21081.6 of the California Public Resources Code.

Pursuant to Government Code Section 65103(c), local officials must implement the adopted plan and the policies and programs it contains. The Mitigation Monitoring Plan consists of two annual reports to the City Council.

COMPONENT 1. The first component is the Annual Report on Growth and Infrastructure which presents the amount and distribution of actual growth of population and residential, commercial, and industrial land uses; growth in households; growth in jobs to the extent that this information is available; the actual capital investment funds allocated to infrastructure projects; and other factors directly related to growth. This allows the City to compare actual growth in the City with projections and to identify trends and the need for updated projections and/or estimates for population, land use, jobs, and housing units.

Letter from Con Howe dated May 25, 1995 & City Response (General Plan FEIR)

— More Details About Measures Now In Development. We are aware that several key implementation measures, such as a new mixed-use development ordinance and the annual monitoring plan, are now in preparation, but are not available for public review. It is important to us, for example, that the proposed annual monitoring plan track progress on the degree to which the Framework is successful in achieving impact mitigation, and not be limited to reporting annual changes in City population, housing, employment and infrastructure capacity. The details of such measures must be made available now so that the public and decision makers can assess the reasonableness and feasibility of these measures for helping to mitigate environmental impacts.

BE-4

BF-3 The City is in full agreement with the authors of this comment. That is why a substantial monitoring program is proposed. All facets of the Framework's mitigation plan will be monitored carefully. A detailed monitoring plan will be approved as part of the Final EIR. The monitoring program will be updated annually to respond to events as they occur.

Segment from the Hillside Federation Case

Filed 9/28/00

CERTIFIED FOR PUBLICATION

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA

SECOND APPELLATE DISTRICT

DIVISION THREE

FEDERATION OF HILLSIDE AND CANYON ASSOCIATIONS et al., Plaintiffs and Appellants, v. CITY OF LOS ANGELES et al., Defendants and Appellants.	B126659 (Los Angeles County Super. Ct. No. BS042964)

The GPF stated that the city would "accommodate [the] projected population and employment growth" (Policy 3.3.1) and would monitor growth and its effects on infrastructure and service capacities annually in order to "consider regulating" development if the infrastructure remains inadequate (Policy 3.3.2(d)). It also stated that the city would increase the GPF's growth projections if and when transportation improvements and other effective mitigation measures are implemented. (Policy

March 2009 "Performance Audit of the City of Los Angeles' Process for Planning Conditions for Development

Conclusions

City departments do not consistently track, plan or budget for public improvements installed as a result of conditions of approval imposed by City Planning decision makers for development projects. Although project applicants pay the costs of installing public improvements, only some departments track and recover maintenance costs for these improvements. Other departments do not track these costs separately or recover ongoing costs. No departments systematically track requirements for new development projects imposed by City Planning decision makers as part of their fiscal planning process.

Some City departments do not collect sufficient fee revenues to cover the costs of maintaining public improvements imposed as conditions of approval for development projects. Specifically, the Urban Forestry Division of the Bureau of Street Services, the Bureau of Street Lighting, and in the Bureau of Sanitation maintenance fee revenues are not sufficient to recover the costs of maintaining public improvements.

SCAG Letter April 6, 1995 in General Plan EIR

A salient feature of the Framework is the proposed monitoring and reporting system. The City is proposing to develop and implement a growth monitoring system and annually prepare a Report on Growth and Infrastructure to the Mayor, City Council and the City Planning Commission. This report is intended to contain policy and program recommendations and summary information generated by the monitoring system on the City's changing circumstances, needs, and trends.

General Plan Page 2.10-15

2.10.5 *Mitigation Measures*

2.10.5.1 Mitigation through Framework Policy

Policies 3.3.2, 7.10.1, 9.17.1, 9.18.1 through **9.18.4, 9.19.1, 9.20.1** through **9.20.3** contained in the General Plan Framework represent measures that would serve to lessen impacts relative to fire/EMS.

Policy 3.3.2 directs monitoring of infrastructure and public service capacities to determine need within each CPA for improvements based upon planning standards. This policy also directs determinations of the level of growth that should correlate with the level of capital, facility, or service improvement that are necessary to accommodate that level of growth. In addition, the policy directs the establishment of programs for infrastructure and public service improvements to accommodate development in areas the General Plan Framework targets for growth. Lastly, the policy requires that type, amount, and location of development be correlated with the provision of adequate supporting infrastructure and services. **Policy 7.10.1** focuses available implementation resources in targeted areas or "communities in need." **Policy 9.17.1** addresses the monitoring and forecasting of demand for existing and future fire facilities and service for the purpose of assuring that every neighborhood would have the necessary level of fire protection service and infrastructure.

General Plan FEIR - Proposed Revised Findings and Statement of Overriding Considerations Page 38 (000306)

F. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Among the six alternatives considered, the Framework Element is the environmentally superior alternative for the following reasons:

1. The No Project, Theoretical Buildout, and Transit Buildout (A1) Alternatives all permit greater levels of population, employment, and housing than the Framework Element, and furthermore do not include policies for managing growth and development in relationship to infrastructure capacity. The greater amounts of permitted population, employment, and housing would result in more significant adverse environmental impacts than the Framework Element.

L.A. Fire Department blames budget cuts for delayed response times

In recent emergency medical cases, three of them fatal, minutes were lost because closer fire trucks had been shuttered because of cutbacks, officials say.

December 23, 2009|By Robert J. Lopez

Critical minutes were lost in two recent emergency medical calls, including one in which a woman died, because nearby Los Angeles Fire Department engines had been taken out of service because of budget cuts, according to fire officials. In both cases, units from farther away responded to the calls.

Since August, at least three people have died -- including a 3-year-old boy and a 65-year-old woman -- in incidents in which a closer fire truck had been shuttered because of cutbacks imposed by the Fire Department.

Fire officials said there is no way to tell if the outcomes in those cases would have been different had the closer units been available, but they acknowledged that time is crucial during emergency responses.

"Time counts," said Capt. Steve Ruda, a department spokesman. "The faster we can get to people in need, the more effective we can become."

Each day, the department takes 15 fire engines and nine ambulances out of service on a rotating basis to help close a $56.5-million budget shortfall. Other departments across the city have also been forced to slash their budgets in the face of a growing deficit.

On Sunday, a 22-year-old woman suffered cardiac arrest in the Harvard Park area of South Los Angeles. She was later pronounced dead at a hospital, the Fire Department said.

Normally, the closest paramedic-staffed engine would have been a half-mile away. However, that engine had been shut down and a unit 1.7 miles away responded instead, arriving four minutes after the alarm was sounded, according to fire officials. An ambulance with two paramedics took eight minutes to get to the scene.

The department's goal is to have the first unit arrive within five minutes 90% of the time, said Battalion Chief Ronnie Villanueva.

In emergencies involving patients in cardiac arrest, he said, irreversible brain damage occurs within four to six minutes. "That's why we try to get our response times under five minutes," he said.

On Friday, a 55-year-old woman suffered, but survived, an apparent stroke at the Chatsworth Metrolink station.

One of the paramedic-staffed fire units usually on duty had been shuttered, while the two other units at that station had been sent to a rescue call minutes earlier, officials said. The firehouse is about a half-mile from the train depot.

It took the next closest fire engine seven minutes to arrive after traveling 3.4 miles, officials said. The closest available paramedic ambulance had to travel 3.2 miles and took 11 minutes to get to the scene, according to the department.

"There will be increased response times," Ruda said of the Chatsworth incident. "That's part of the sacrifice in order to meet the monetary budget."

robert.lopez@latimes.com

Los Angeles Fire Department Protests Budget Cuts

Dozens of firefighters from the Los Angeles City Fire Department (LAFD) arrived at city hall, signs in hand for an informational picket to oppose budget cuts scheduled to begin tomorrow. Firefighters then sat quietly in city council chambers to show the council their concern for public and firefighter safety. According to firefighters, the cutbacks may save money but will put lives at risk by increasing response time.

"I don't think the normal person understands the lack of coverage they're going to get because of these brownouts. The level of service decreases exponentially because of this," LAFD Capt. Greg Malais told ABC 7.

Starting tomorrow morning, the city plans to start the "Modified Coverage Plan" proposed by Fire Chief Douglas Barry. The plan eliminates 15 fire engines and 9 ambulances every day on a rotating basis in order to reduce spending by $39 million.

"Just last week at Fire Station 15, we had a structure fire in our first end district where if our truck company had not of been there, instead of having one structure on fire we would have had three," LAFD Capt. Arthur Burgess said to ABC 7.

Chief Barry acknowledges that response times and workload will increase, but all city fire stations will stay open with at least one active fire truck and ambulance.

The United Firefighters of Los Angeles City Local 112, who organized the public information campaign today in front of city hall, accuses the city of using the cutbacks as a negotiating tool in contract talks, according to ABC 7.

Los Angles City Councilwoman Janice Hahn explains, "They're willing to give up their sick pay payout, they're willing to give up their uniform allowance for a year and they think that'll save about $4 million which would keep, for the month of August, all of the stations fully operational." The Councilwoman has a plan in motion to try to work out that arrangement.

Brownouts are still slated to start tomorrow morning where firefighters normally assigned to the units will be shifted to fill vacancies on other trucks and ambulances, saving overtime pay.

State of the Cities in 2011: Infrastructure a Prerequisite for Economic Success

March 18, 2011
by Caitlin Geary

This is the fifth in a seven-part series about mayors' 2011 State of the City speeches.

In difficult economic times, the need to invest in city infrastructure—transportation, public works and technology—does not decline. Rather, residents still expect usable roads, transit options, clean water and technological advances. And as cities struggle to maintain economic competitiveness, mayors recognize that city infrastructure is the necessary shell that allows cities to develop their economies and attract new investment.

In their State of the City addresses, mayors routinely stressed the importance of infrastructure investment as a way, not only to increase quality of life, but to create jobs and spur development. Their focus is on the future of their cities.

For instance, Mayor Benjamin of Columbia, S.C., declared that "if we're going to lead on job creation, we must first lead on transportation." His intention is to promote public transportation in an entirely different way than the city has in the past, which includes energy efficient buses, regional transportation hubs and inter-modal options. "This is about a new vision that sees public transportation not as a burden to be carried but a boon that can carry us into a bright new future together," he said.

In addition, one major aspect of Mayor Jim Suttle's speech of Omaha, Neb., was the city's recent efforts to develop a Transportation Master Plan in order to ensure the mobility of residents now and into the future. "Transportation connects our community and we want to see policies providing choices in mobility to the citizens of Omaha. The goal is to determine the most effective and efficient choices for moving people throughout our city," he said.

Even smaller cities like Greenville, Miss., that rely heavily on investment from small businesses, realize the connection between infrastructure development and the ability to attract businesses and create jobs. That is why Mayor Hudson declared that the city is working to deliver broadband internet throughout the city so that businesses are able to interact with suppliers and customers. "We must be able to deliver the goods of our local businesses to the world that awaits and that is willing to buy," she said.

Mayors attributed their infrastructure successes to the productive use of available sources of funding. In Bowie, Md., Mayor Frederick Robinson declared that the city had been successful in obtaining almost $2 million in federal, state and foundation grants for capital projects. And in West Palm Beach, Fla., Mayor Frankel stressed the importance of federal and state funding for infrastructure projects, which have in turn improved the lives of residents and created hundreds of jobs.

Cities are already seeing the positive economic effects of their infrastructure investments, and mayors have no plans to curtail infrastructure advances that will play a major role in local economic recovery. Rather, cities like Bowie, Md. and Syracuse, N.Y., plan to be even more proactive about seeking federal funding to support city operations and work with their city councils to make the process for obtaining federal Community Development Block Grant (CDBG) funds more professional, transparent and results-oriented.

Echoing NLC's recent call for continued CDBG funding at the local level, Joe Scarborough, the Tuesday afternoon general session speaker at the NLC Congressional City Conference put partisan politics aside for the session to voice his concern for the federal government's apparent lack of concern for "domestic development," as he termed it. The emphasis on infrastructure investment in the 2011 State of the City speeches is on-the-ground evidence that this "domestic development," and the resources required to fund it, are necessary prerequisites for local economic success.

CALIFORNIA

DEPARTMENT OF TRAFFIC
ROOM 1200, CITY HALL
LOS ANGELES, CALIF. 90012
485-2255

CITY TRAFFIC ENGI
S. E. (SAM) TAY

IN REPLY PLEASE
OUR REFERENC

TOM BRADLEY
MAYOR

December 4, 1975

CWP 75-381
Century City

Mr. Calvin S. Hamilton, Director
Department of City Planning
Room 561C, City Hall
Los Angeles, CA 90012

Attention Mr. Bob Rogers

Dear Mr. Hamilton:

Century City Specific Plan

The attached report is in response to your request for a traffic analysis to be used in the preparation of a specific plan for Century City (including the Twentieth Century-Fox property).

Briefly, the report concludes that the street system now serving Century City and the surrounding area does not meet the needs of the area, nor will it in the future. As a consequence, it is recommended that further intensification of land use in Century City and the surrounding area be halted or that alternate uses be found that do not add to the existing peak-hour congestion.

Very truly yours,

H. M. Gilman
Traffic Engineer
City-Wide Planning Coordination Section

APPROVED BY:

L. L. Clearwater
Senior Traffic Engineer
Program Development Division

WFC:dk

cc w/attach:

Councilman Zev Yaroslavsky
Western District Office
Mr. G. W. Skiles
Mr. M. F. Huber

EXHIBIT B

PROGRAM DEVELOPMENT DIVISION
City-Wide Planning Coordination Section

STAFF REPORT
December 3, 1975

Century City Area Traffic Study

Approved by:

S. S. (Sam) TAYLOR
General Manager

Table I

Land Use Facts - Existing and Under Construction

Building	Office Area	Retail Area	Other
Welton Becket	130,000		
Gateway West	270,000		
Gateway East	270,000		
1900 Avenue of Stars	527,000		
1901 Avenue of Stars	450,000		
Century City North	527,000		
Northrop	225,000		
Property Research	306,000		
Shareholders	472,000		
Century Park Plaza	308,000		
NCR	47,000		
Auto Club	26,000		
Prudential Savings	46,000		
Century City Hospital			165,000
Century City Medical (198 beds)			222,000
ABC Entertainment Center	200,000	300,000	3,000 seat
Theme Towers	2,072,000		
Century Square		500,000	
Bullocks[1]		130,000	
Century Plaza Hotel			800 room
Misc. (Sr. Pico, etc.)		40,000	
Total Gross footage	5,876,000	970,000	387,000
Total Net leasable (85% gross)	5,000,000	825,000	323,000

[1]Under construction

Table II

Potential 24-Hour Trips Generated by Century City Development

Land Use	Trip Generation Factor (Trips/Unit)	1975 Trips[3]			1976 Trips[4]			1990 Trips		
		Units[1]	Partially Occupied[2]	Fully Occupied	Units[1]	Partially Occupied[2]	Fully Occupied	Units[1]	Partially Occupied[2]	Fully Occupied
Comm. Office	12	3,233	29,900	38,800	5,000	46,200	60,000	13,274	123,200	160,000
Med. Office	43	187	6,500	8,400	187	6,500	8,400	187	6,500	8,400
Retail	45	714	28,900	32,100	825	33,400	37,100	935	37,800	42,000
Hotel	9	800 rooms	6,500	7,200	800 rooms	6,500	7,200	1,500 rooms	12,200	13,500
Hospital	26	136	2,700	3,500	136	2,700	3,500	136,000	3,500	3,500
Apartments	7	706 units	4,000	5,500	706 units	4,000	5,500	6,500	33,200	45,500
Industrial	32	76 acres	2,200	2,400	76 acres	2,400	2,400	-0-	-0-	-0-
			80,700	97,900		99,300	124,100		216,400	272,900

[1]Net Square footage in thousands, except where otherwise noted.

[2]All office, residential, and hospital space 77% occupied; other uses 90% occupied.

[3]Excludes Theme Towers and Bullocks

[4]Includes Theme Towers and Bullocks

There are differences between the values noted by the Planning Department and those used in this report. Those differences are the result of separating the medically-oriented facilities from the commercial office use, as well as apportioning the uses contained in the ABC Entertainment Center instead of designating the building entirely as retail use.

All land uses considered in this report are as follows:

Use	1975	1976	1990
Commercial Office	3,233,000	5,000,000	13,274,000
Medical Office	187,000	187,000	187,000
Retail	714,000	825,000	935,000
Hotel	800 rooms	800 rooms	1,500 rooms
Hospital	136,000	136,000	136,000
Apartments	786 units	786 units	6,500 units
Industrial (Fox)	76 acres	76 acres	-0-

Trip Generation

The following trip generation factors are used in this report:

Land Use	Factor (trips per day)
Commercial Office	12 trips per 10^3 net leasable sq. ft.[1]
Medical Office	43 trips per 10^3 net leasable sq. ft.[2]
Retail	45 trips per 10^3 net leasable sq. ft.[1]
Hotel (w/convention facility)	9 trips per room[3]
Hospital	26 trips per 10^3 net sq. ft.[4]
Apartments	7 trips per dwelling unit[3]
Industrial (Fox property)	32 trips per gross acre[3]

[1]Source: Century City Traffic Circulation and Parking Study, De Leuw Cather and Company, April, 1963.

[2]Source: Sixth Progress Report on Trip Ends Generation Research Counts, State of California, Division of Highways, District 04, December, 1970.

[3]Source: Trip Generation by Land Use, Maricopa Association of Governments, Maricopa County, Arizona, April, 1974.

[4]Source: Third Progress Report on Traffic Generators, State of California, Department of Transportation, District 11, December, 1973.

Applying these factors to the land uses previously noted, the estimated traffic generated by existing and future Century City development is as shown in Table II.

The "Partially Occupied" column in this table represents the existing 77 per cent occupancy rate for Century City office space[1] applied to the office, residential, and medical uses. The remainder of the uses in this column were considered to be occupied to 90 per cent of the net leasable space.

Existing Century City Traffic

Table III compares the ADT (Average Daily Traffic)[2] crossing the four screenlines immediately surrounding the Century City area (see Figure 1). The location of these screenlines is such that all traffic entering, leaving, and/or passing through the Century City is counted. From this table, it can be seen that traffic in the area around Century City has been growing at an average rate of 4 per cent per year since 1966.

The cordon around Century City is currently crossed by 277,000 vehicles per day. Generation estimates for this area (within the cordon) account for 81,000 trips per day. This indicates that 55 per cent of the traffic inside the Century City cordon is actually through traffic with origins and destinations outside the area. Similarly, if a cordon including Wilshire Boulevard is examined, the portion of total traffic which is through traffic increases to 64 per cent.

It is important to note that were the existing land uses "fully occupied" as noted in Table II, approximately 17,000 additional trips would be crossing the screenlines noted in Table III. This would be the same volume increase as the increase in Century City traffic experienced between 1973 and 1975, or would be equal to the total daily trips now on the south roadway of Santa Monica Boulevard near Century City (see Table III).

Peak Hour Characteristics

From the 24-hour automatic counts used to compile the 1975 ADT's shown in Table III, peak-hour factors as a percentage of the ADT, are as shown in Table IV.

---

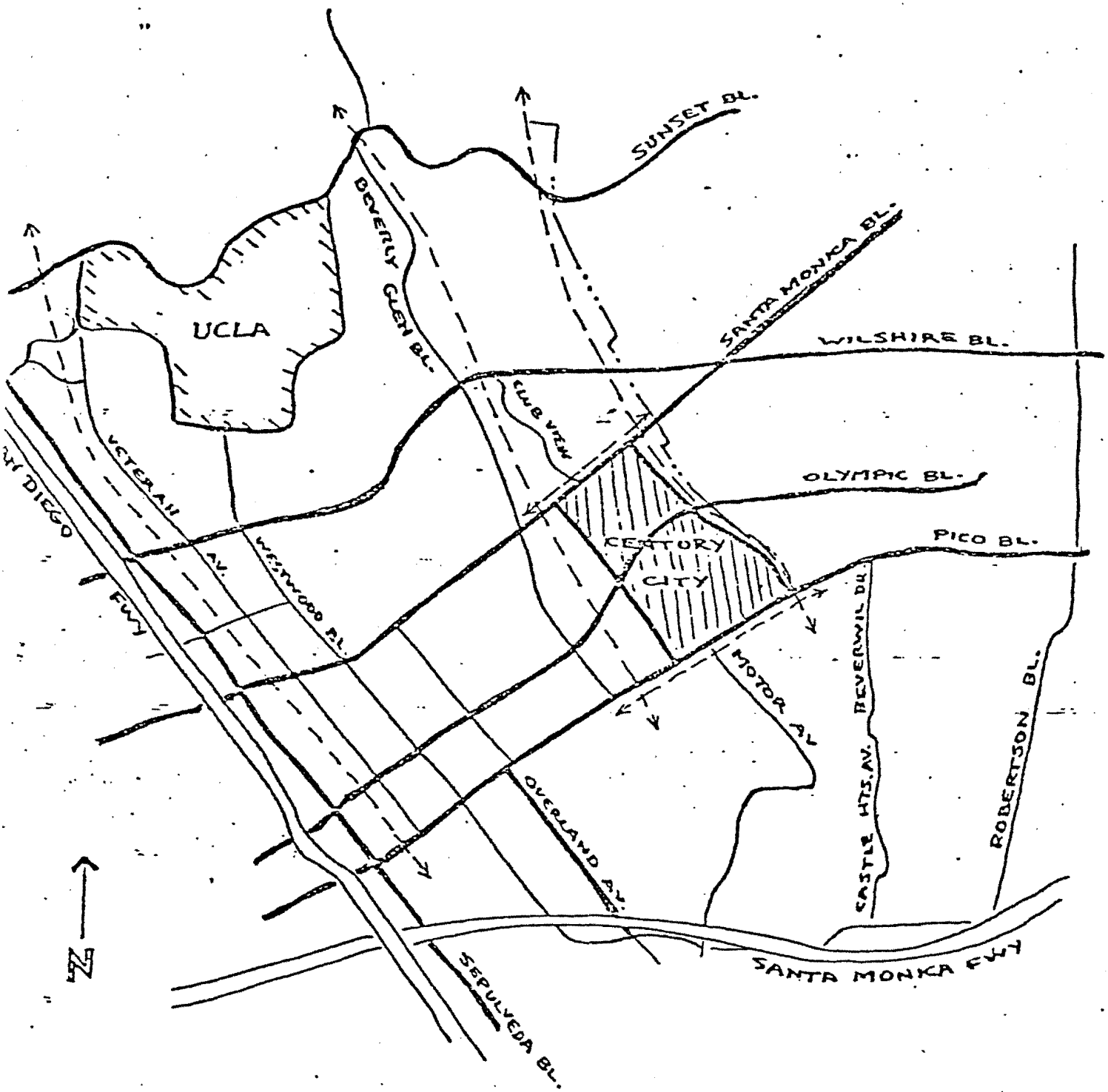
[1]Proposed Environmental Impact Report for A Proposed Specific Plan and Zone Change on the Twentieth Century-Fox Studio Property, Department of City Planning, City of Los Angeles, Page 196, May 8, 1974.

[2]For this report, available typical weekday traffic volumes for earlier years have been assumed to represent ADT.

Table III

Existing Century City Area Traffic Volume Trends

Screenline/Street	1966 ADT	1970 ADT	1973 ADT	1975 ADT	1995 ADT	Avg. Annual Change 66-75	73-75	75-95
East-West Travel								
1. N-S Screenline E/O Century Park East								
Santa Monica Bl. (N- Rdwy)	28,000	36,000	35,000	36,000	52,000	3	0	2
Santa Monica Bl. (S-Rdwy)	11,000	14,000	19,000	17,000	23,000	6	-5	2
Olympic Bl.	32,000	38,000	41,000	44,000	57,000	4	4	2
Pico Bl.	25,000	27,000	29,000	32,000	44,000	3	5	2
Total	96,000	115,000	125,000	129,000	176,000	4	2	2
2. N-S Screenline W/O Century Park West								
Santa Monica Bl. (N-Rdwy)	27,000	31,000	34,000	36,000	51,000	4	3	2
Santa Monica Bl. (S-Rdwy)	12,000	13,000	14,000	17,000	22,000	5	11	1
Olympic Bl.	28,000	37,000	36,000	42,000	55,000	6	8	2
Pico Bl.	24,000	25,000	28,000	30,000	48,000	3	4	3
Total	91,000	106,000	112,000	125,000	176,000	4	6	2
North-South Travel								
1. E-W Screenline N/O Santa Monica Bl.								
Club View Dr.	2,000	3,000	3,000	4,000	8,000	11	16	5
2. E-W Screenline S/O Pico Bl.								
Motor Ave.	12,000	16,000	18,000	19,000	27,000	7	3	2
Total All Screenlines	201,000	240,000	258,000	277,000	387,000	4	4	2



LEGEND:

FREEWAY ═══

MAJOR HIWAY ———

SCREENLINE ←——→

CITY LIMIT ——·——

CENTURY CITY AREA

FIGURE 1.

Table IV
Peak-Hour Factors For Century City Generated Traffic
As a Percentage of 24-Hour Volume

Location	AM Peak Hour		PM Peak Hour	
	N- or E-bnd	S- or W-bnd	N- or E-nd	S- or W-bnd
W/O Century Park West				
Santa Monica Bl. (N-Rdwy)	4.3	2.5	2.5	4.6
Santa Monica Bl. (S-Rdwy)	7.1	1.5	2.3	7.1
Olympic Bl.	7.5	2.5	3.1	6.7
Pico Bl.	5.4	2.7	3.5	6.2
Avg.	6.1	2.3	2.9	6.2
E/O Century Park East				
Santa Monica Bl. (N-Rdwy)	3.1	4.0	3.9	4.2
Santa Monica Bl. (S-Rdwy)	4.0	2.2	4.3	4.1
Olympic Bl.	5.8	2.5	4.1	6.1
Pico Bl.	4.8	3.5	4.3	5.3
Avg.	4.4	3.1	4.2	4.9
Motor Ave.	7.9	2.1	3.6	6.6
Club View Dr.	2.4	9.6	9.5	4.0

Generally, the morning peak hour at Century City starts at 8:15 and the evening peak hour starts at 5:00. Most factors shown above are in accord with established metropolitan average values except for Olympic Boulevard, Motor Avenue, and Club View Drive and the south roadway of Santa Monica Boulevard, which carry an unusually high percentage of traffic during both peak hours.

Area-Wide Traffic

Table V presents a comparison of traffic growth trends across the screenlines shown in Figure 1 for the principal east-west routes along the corridor serving Century City and the West Los Angeles area. This corridor is generally the same as that intended to be served by the now deleted Beverly Hills (Route 2) Freeway. As with the smaller Century City area, traffic between Veteran Avenue and the Beverly Hills City Limits in this corridor has experienced an average annual increase of nearly 4 per cent (3.8 per cent) since 1966.

Intra-Area Circulation System

Quantative data relative to the roadway system internal to Century City was not available for this report. However, observations have indicated that except for occasional congestion at local driveways, the internal roadway system is adequate for the existing development.

It is anticipated that the opening of new streets or improvement of existing streets within Century City will be accomplished when applicable as part

Existing and Future Area East-West Traffic Volume Trends
(Volume to Nearest Thousand)

Screenline/Street	1966 ADT	1973 ADT	1975 ADT	1995 ADT	Avg. Annual Change 66-75	73-75	75-95
1. N-S Screenline E/O Century Park East							
Sunset Bl.	22,000	28,000	29,000	45,000	3.5	1.8	2.8
Wilshire Bl.	35,000	43,000	44,000	63,000	2.9	1.2	3.8
Santa Monica Bl. (N-Rdwy)	28,000	36,000	36,000	52,000	3.1	0	2.2
Santa Monica Bl. (S-Rdwy)	11,000	19,000	17,000	23,000	3.9	-5.3	1.8
Olympic Bl.	32,000	41,000	44,000	57,000	4.2	3.7	1.5
Pico Bl.	25,000	29,000	32,000	44,000	3.1	5.2	1.9
Total	153,000	196,000	202,000	284,000	3.6	1.5	2.0
2. N-S Screenline E/O Beverly Glen Bl.							
Sunset Bl.	23,000	35,000	40,000	57,000	8.2	6.3	2.2
Wilshire Bl.	36,000	48,000	44,000	66,000	2.5	-4.2	2.5
Santa Monica Bl. (N-Rdwy)	27,000	34,000	36,000	51,000	3.7	2.9	2.1
Santa Monica Bl. (S-Rdwy)	12,000	13,000	17,000	22,000	4.6	15.4	1.5
Olympic Bl.	27,000	36,000	41,000	55,000	5.8	6.9	1.7
Pico Bl.	24,000	29,000	30,000	43,000	2.8	1.7	3.0
Total	149,000	195,000	208,000	299,000	4.4	3.3	2.2
3. N-S Screenline W/O Veteran Ave.							
Sunset Bl.	27,000	33,000	31,000	52,000	1.7	-3.0	3.4
Montana Ave.	10,000*	13,000	13,000	20,000	3.3	0	2.7
Levering Ave.	3,000*	4,000	4,000	7,000	3.7	0	3.8
Wilshire Bl.	64,000	77,000	96,000	103,000	5.6	12.3	3.6
Ohio Ave.	10,000*	14,000	19,000	22,000	4.4	17.9	0.8
Santa Monica Bl. (N-Rdwy)	30,000	37,000	34,000	50,000	1.5	-4.1	2.4
Santa Monica Bl. (S-Rdwy)	8,000	4,000	10,000	13,000	2.8	7.5	1.5
Olympic Bl.	28,000	35,000	38,000	49,000	4.0	4.3	1.5
Pico Bl.	24,000	29,000	28,000	43,000	1.9	0	2.7
Total	204,000	245,000	273,000	359,000	3.8	5.7	1.6

*Estimated

of the normal tract map or zone change approval process and that these improvements will be sufficient to maintain the adequacy of the internal circulation system.

Internal-External Circulation System Interface

For this study, it was assumed that Century Park West will eventually be extended from Olympic Boulevard southerly to Pico Boulevard. Presumably this would occur as part of the redevelopment of the Twentieth Century-Fox property.

While this is desirable with respect to internal traffic, the junctions at Pico and Olympic Boulevards can be expected to reduce the capacity of these streets by approximately 10 per cent if the currently proposed designs are implemented. These designs are (1) an at-grade intersection at Olympic Boulevard, and (2) an at-grade tee intersection at Pico Boulevard.

The Department has long pointed out the drawback of these designs and again recommends, this time as part of the Century City Specific Plan, that the future extension of Century Park West require grade separation at Olympic Boulevard and that the opening at Pico Boulevard be aligned with Motor Avenue.

Highway Improvements and Deficiencies

Probable improvements to the streets serving Century City are restricted, by the West Los Angeles District Plan, to Santa Monica and Pico Boulevards. As shown in Table VI, these improvements would provide capacity for about 1,300 directional peak-hour trips.

Similarly, the 100,000-plus daily trips that were to have been accommodated by the Beverly Hills Freeway are equal to the daily trips now carried by both roadways of Santa Monica Boulevard and Olympic Boulevard combined. Or, put another way, the total estimated growth to 1995 across the screenlines surrounding Century City (see Table III) could have been accommodated by the freeway. Now, virtually all this growth must be accommodated by the existing streets with corresponding increase in peak-hour congestion.

Transit and Other Travel Modes

Like the Beverly Hills Freeway, rapid transit was advocated to provide a transportation alternate for Century City. Like the Beverly Hills Freeway, transit for Century City, at least for the time period under discussion, is now defunct; there are no serious proposals for a transit line west of La Brea Avenue. Consequently, the Department considers any discussion of rapid transit relative to Century City to be delusive.

Historically, as shown below, the single passenger auto is the overwhelming mode of travel used by employees working in Century City and the surrounding communities:

Table VI

Route 2 Corridor East-West Travel Demand-Capacity Comparison

Screenline[1]	Peak Hour Directional Volume (vph)[2]	Existing Capacity		Planned Capacity[4]	
		Capacity (vph)[3]	Deficiency (%)	Capacity (vph)[3]	Deficiency (%)
1. EXISTING TRAFFIC					
N-S E/O Century Park East	9,700	8,700	12	8,700	12
N-S E/O Beverly Glen Bl.	11,000	9,300	18	10,300	None
N-S W/O Veteran Ave.	14,100	11,100	27	11,400	None
2. 1995 TRAFFIC					
N-S E/O Century Park East	136,000	8,700	56	8,700	56
N-S E/O Beverly Glen Bl.	15,500	9,300	67	10,300	50
N-S W/O Veteran Ave.	18,300	11,100	65	11,400	61

[1]Screenline limits are Sunset Boulevard to Pico Boulevard.

[2]1995 peak-hour projections obtained by using existing peak hour-to-ADT ratio for total screenline and applying to 1995 screenline totals shown in Table IV.

[3]Capacity estimated by assuming 700 vehicles per hour for Olympic Boulevard and Improved Santa Monica Boulevard; 600 vehicles per lane per hour for remaining roadways.

[4]Planned capacity assumes future improvement of Pico Boulevard and Santa Monica Boulevard only. Santa Monica Boulevard improvement per draft of Route 2 Cooperative Transportation Study, California Department of Transportation, June, 1975.

Employee Mode of Travel	1966[1]	Per Cent 1968[1]	1972[2]
Auto Driver	81.5	90.0	88.5
Auto Passenger	10.0	4.0	4.8
Bus	5.6	3.0	4.0
Walk & Other	2.9	3.0	2.7
Total	100.0	100.0	100.0

In 1972 an average vehicle occupancy of 1.1 persons per auto was noted for Century City[2], compared with an average occupancy of 1.36 in 1972 and 1.37 in 1974 for autos entering Downtown Los Angeles[3].

Although data concerning mode-of-travel and vehicle occupancy are not available for this year, there is no indication of any significant change in the characteristics of employee travel.

Summary of Findings and Conclusions

The results of this analysis are as follows:

1. Primary access to Century City is via three major east-west surface streets. Existing peak-hour directional capacity of these streets is already deficient, varying from 12 to 27 per cent depending upon location.

2. Century City traffic has been growing at an average annual rate of 4 per cent since 1966.

3. Future growth at a 2 per cent annual average rate is expected until 1995.

4. Future traffic growth, even with the street improvements permitted by the approved West Los Angeles District Plan, will result in the capacity of these streets being exceeded by 56 to 61 per cent by 1995.

5. North-south access to Century City is limited to two local residential streets.

---

[1]Source: Century City Traffic Circulation and Parking Study, De Leuw Cather and Company, April, 1968.

[2]Source: Century City Traffic Study Report, Linscott Associates, September, 1972.

[3]Source: May, 1974 Downtown Los Angeles Cordon Count, Department of Traffic City of Los Angeles.

6. There are no plans to improve these streets, nor is there a realistic alternate north-south route (i.e., Robertson Boulevard is so out-of-route as to be unattractive to drivers between Century City and the Santa Monica Freeway).

7. The planned-for adjuncts to the surface street system are no longer extant; that is, the Beverly Hills Freeway and rapid transit. Without the planned-for transportation system, the original level of development for the entire area, including Century City, can no longer be accommodated.

8. Not only will additional development burden the street system, but simply an increase in the occupancy rate in the existing development would be equivalent to up to the past two years' traffic growth in the Century City area.

9. From the above, it can be concluded that the street system serving the Century City area is now and will remain deficient in capacity, and that planned improvements to this system will not remedy the situation.

10. The existing level of service of the street system also serving adjacent communities is no better, and in some cases worse, than in the Century City area. Westbound Wilshire and Santa Monica Boulevards in Beverly Hills, westbound Wilshire Boulevard in Westwood, and westbound Santa Monica Boulevard at the Santa Monica Freeway in West Los Angeles during the evening peak hour are examples of even poorer service than that found in the Century City area at the same time.

From these, it would appear that further development in the entire area, including Century City, would be contrary to objectives stated in the Concept, City-Wide, and District plans. Each of these proposes, in essence, that a transportation system, coordinated with land use, should adequately accommodate the area's travel needs and that land should not be developed if the traffic generated exceeds the capacity of the system.

Recommendations

Based on the above findings, the Department can only recommend that either (1) no further development be permitted in the entire area, including Century City, or that (2) the area's street system be improved in accordance with the Department's recommendations relative to the West Los Angeles District Plan.[1] The following were included in the Traffic Department recommendations but did not appear in that Plan: the retention of Motor Avenue as a designated secondary highway, the improvement of Overland Avenue between Pico and Olympic Boulevards, and the construction of a new north-south route utilizing Beverwil Drive.

---

[1]Update of West Los Angeles District Plan Traffic Analysis, Department of Traffic Staff Report, December 5, 1973.

With respect to the internal roadway system the Department recommends that when and if Century Park West is opened between Pico and Olympic Boulevards, a grade separation be required at Olympic Boulevard and that the roadway be aligned with Motor Avenue at Pico Boulevard. These steps are required to minimize the further reduction of capacity on Olympic and Pico Boulevards.

PROGRAM DEVELOPMENT DIVISION: L. L. Clearwater, Senior Traffic Engineer

CITY-WIDE PLANNING COORDINATION SECTION: H. M. Gilman, Traffic Engineer

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TOWN HALL

LOS ANGELES

The Los Angeles Traffic and Transit Problem

A REPORT BY

THE REGIONAL PLANNING AND DEVELOPMENT SECTION

ARTHUR B. GALLION, *Chairman*

FEBRUARY, 1947

The Los Angeles Traffic and Transit Problem

THE LOS ANGELES traffic and transit problem has become so acute that one cannot enter the downtown district or drive on a major thoroughfare without wondering, "Why doesn't someone do something?" Comfort can be taken from the fact that the problem is common to all the large cities of the nation. Hope and determination, as well as comfort, should arise from the fact that Los Angeles has a better opportunity than most cities to tackle the problem effectively. But delay will destroy our present advantage; as population density rises and open areas are built up, the possibilities of effective action will diminish and the cost of necessary action will increase.

An effective attack upon the problem is possible, but a final solution is not to be expected. A permanent solution is no more possible than is a permanent fit in the shoes of a growing boy; each improvement in traffic facilities invites an increase in the traffic burden. To the degree that we can move more people from where they are to where they want to go, and do so with a minimum of cost, delay, and irritation, we can say that we have effectively attacked the problem. Until Los Angeles stops growing and changing, we cannot expect a final solution.

The traffic and transit problem has many elements. These include: freeways, and—since freeways can't be built overnight—the best use of existing streets, mass rapid transit, off-street parking facilities, and the financing of whatever plans are agreed upon. The purpose of the present report is to provide a broad perspective of these various elements for the average citizen, rather than to duplicate the many technical and engineering reports available for examination by the specialized student.

EFFECTIVE USE OF PRESENT STREETS

SINCE the construction of even the initial phase of the proposed freeway system will require several years, early alleviation of traffic congestion requires the most effective use of present street facilities. Much can be done, and fortunately much is being done.

Among the suggested, planned, or already accomplished steps for improving the use made of present street facilities are: eliminating on-street parking in downtown areas, making certain streets into one-way streets, moving the dividing line on congested boulevards during peak traffic hours, eliminating left-hand turns at some intersections, installing better traffic signals at important intersections, rerouting some transit lines, and staggering work hours to flatten out the morning and evening traffic peak.

Wise application of such measures depends upon adequate traffic engineering. The problems remain the same in principle but change, often rapidly, in detail. The office of the City Traffic Engineer should be equipped with such staff as may from time to time be necessary for surveying the problems in detail and making recommendations which, based upon demonstrable fact, can be protected against attack by adversely affected special interests.

The elimination of on-street parking in the downtown district offers an example of conflicts of interest which arise when new regulations are proposed. Parking on both sides of a six-lane street reduces to four the number of lanes usable for traffic flow; backing into and moving out of curb parking spaces cause delays in the flow of traffic in two of the remaining traffic lanes. For this reason, the City Traffic Engineer and others have proposed that on-street parking be entirely prohibited on downtown streets. Such parking has already been sharply curtailed, particularly during rush hours, and fines imposed on violators have been substantially increased, a step necessary to enforcement.

The elimination of on-street parking is affected by the availability of off-street parking facilities, a problem discussed below. Whether elimination of off-street parking can be carried further now or may have already been carried too far is a question raised by a traffic court judge, who says he wants to see the streets "given back to the people," and who claims that congestion is caused by cars lining up in the streets while they wait to get into parking lots. To what extent on-street parking should be allowed at the expense of traffic flow is a question which should be settled not by slogans but by engineering study through which each factor can be weighed in relation to others.

Problems of conflict between one factor or interest and others arise in connection with the creation of one-way streets, the elimination of

turns, etc. It is not within the scope of this report to make recommendations upon the desirability of any one of these steps on any particular street or at any selected intersection. It is important that our present streets be used at maximum efficiency; as to particular steps for reaching this goal, decisions should be based upon careful, adequate, and continuously up-to-date traffic engineering studies.

OFF-STREET PARKING

THE FINEST possible system of freeways from shoreline to mountains would be to an extent wasted if the freeway user who wished to do business in the downtown district could not find a place to park when he got there. Off-street parking is a problem of other built-up areas as well as of the central business district. In the latter area, the problem is more acute and is of greater general concern to the whole metropolitan area of which it forms the hub.

At present, there is a conservatively estimated deficiency of ten to twelve thousand off-street parking spaces in the downtown area. As the population of the metropolitan area grows, still more parking spaces will be needed, while at the same time an attendant increase in land values would make retention of present parking lots more difficult.

The inter-relation of all aspects of the traffic problem is illustrated by the question of off-street parking. If all people now entering the downtown district on business came by private automobile, assuming the present average number of passengers per car, the area of parking space required to accommodate their cars would be greater than the total area of the district, including land now used by streets and occupied by buildings. It is apparent that increased travel in streetcars and busses (the mass transit phase of the total problem) rather than in private automobiles has an important bearing upon the need for off-street parking facilities.

To provide additional parking space and to prevent present parking space from being diverted to other uses, it would be possible for the city to condemn needed land. For two reasons, this seems a last rather than a first resort. It would add a new function to an already complex city government structure. The direct cost of condemning the land and the indirect cost of removing land from the tax rolls would be borne by all of the taxpayers, not solely by those who would benefit from the condemnations.

The creation of a Parking District Authority is also legally possible. If the problem cannot be dealt with by private efforts, this may prove necessary and desirable.

The line of attack now being prepared against the off-street parking problem is a private corporation, sponsored by downtown property owners and business interests. Leaving the problem of parking in the area north of Second Street to the Civic Center authorities, the aim of this corporation is to aid in providing ten thousand additional parking spaces in the area south of Second Street. The corporation may buy, or lease, and operate parking lots, and may build and operate garages. The lack of unimproved land in the downtown district indicates that parking vertically, in garages, will be necessary. Of the ten thousand additional parking spaces, it is contemplated that three thousand would be open air, forty-five hundred would be in garages, and the remaining twenty-five hundred in a garage to be built under Pershing Square.

The Pershing Square garage, patterned after the garage built just before the war under San Francisco's Union Square, will presumably be built and operated by a separate corporation. Assuming that construction and operating costs can be brought into line with prospective revenues, second mortgage money is expected from interested merchants and property owners, first mortgage money from banks and other financial institutions. Operation of the garage will require one-way streets on Fifth and Sixth Streets, already planned, and discontinuance of the use of Pershing Square as a bus terminal. As in San Francisco, the park above the underground garage can be preserved.

The Zoning Ordinance of 1946 contains requirements that new buildings provide minimum parking areas. These requirements will assist in keeping parking facilities abreast of the need for them as new areas are more intensively developed. It is important that these requirements be maintained and enforced.

FREEWAYS

THE FREEWAY program for the Los Angeles metropolitan area has the agreement and support of all who are affected by the program and have studied it, particularly the county, the City of Los Angeles, and the suburban cities. Long-term plans call for 613 miles of freeways, with a projected cost of a billion dollars or more. Priorities in an initial

ten-year program have been given to 165 miles of freeways to cost $300,000,000. Routes have been agreed upon and on several routes acquisition of right of way has been substantially completed.

An important feature of this initial phase of the freeway program is the system of by-passes around the central downtown area. Surveys show that about half of the cars entering the downtown district have no destination within it but are going from one side of the metropolitan area to another. The proposed by-pass system would enable such cars to go around the downtown district. Remaining on the freeways, they would gain time and would avoid becoming involved in and adding to the congestion of downtown streets.

The main features of the freeway program having been agreed upon, questions remaining include the question of combining bus and train operation with the freeway program and the question of financing.

MASS TRANSPORTATION

UNLESS the freeway program is paralleled by a program for the improvement of mass transportation facilities it will create a problem almost as big as the one it solves. Downtown streets and parking facilities can never be made adequate to the situation which would exist if everyone came to the downtown district by private automobile. The building of express highways, unaccompanied by improved mass transportation facilities, tends to bring about just this situation; the proportion of people using private automobiles for their daily travel, already 50% here as compared with 15% in New York, will increase still further. Better and faster mass transit must go along with better and faster express highways.

It is estimated that an addition of about fifteen per cent to the cost of the freeway program would provide right of way necessary for rail lines in the dividing strip of those freeways where rail lines are appropriate. It is also believed that incorporating this feature in the freeway program would approximately double the program's effectiveness. The value to motorists of having adequate mass transit facilities, since they alleviate traffic congestion, is demonstrable although not easily measured. Yet, under present legal restrictions, gasoline taxes could not be used to buy such right of way (excepting to the extent to which a dividing strip of the required width is necessary as

a highway safety feature). Nor have other methods of financing been found. Unless such other methods of financing are found, a relaxation of present legal restrictions on the use of gas tax money for this purpose appears both desirable and justified. A large part of sums devoted to such use could in any case be recovered from franchise fees, etc. Planning agencies have, in some instances, failed to emphasize the importance of developing mass transportation facilities as a part of the freeway program. It is believed that this development is essential and merits more positive consideration.

Certain other improvements in mass transportation as an adjunct of the freeway program are necessary and are in the process of study and development. Limitations on the possible extent and use of street space along with the desirability of increasing use of mass transit vehicles dictate the probable necessity of one or more subways for both rapid transit and urban transit use in the downtown area, with connections from these subways to the proposed center malls or rights of way on the most important freeways approaching this area. Transportation engineers have recommended a four-lane subway under Broadway and studies as to the feasibility of four-lane or two-lane subways are continuing. Also, the conversion of certain streets into one-way streets dictates the necessity of replacing existing streetcar lines by rerouting motor coach or trolley coach lines, particularly on 5th and 6th Streets and 8th and 9th Streets, since these streets have been designated for one-way use leading to and from the proposed by-pass system of the freeways. In conjunction with proposed reroutings and substitution of motor coach and trolley coach lines for streetcar lines, elimination of traffic hindrances created by left-hand turns is being considered and carried out.

FINANCING OF FREEWAYS

THE PROPOSED freeway program including the 165 miles of freeways for this area has been the matter of an extensive investigation covering a two-year period by a Joint Fact-Finding Committee on Highways, Streets, and Bridges of the California Legislature. This committee was created by Senate Concurrent Resolution No. 27 of the 56th Legislature and was directed to study and analyze all facts relating to public highways, roads, streets, and bridges of California and to report to the 57th Legislative Session which convened in Sacramento on the

first Monday of January of this year. The reports of this committee and their recommendations indicate the necessity of added financing to present highway revenues if the construction program is to be carried out. These reports suggest possibilities of increasing revenues for this purpose by means of increasing gasoline taxes, registration fees, user taxes, and ad valorem taxes. The Governor of the State of California has indicated the importance of the subject by calling a special session of the Legislature to run concurrently with the 57th regular session for the principal purpose of considering the matter.

Our consideration of this subject has indicated both the necessity and reasonableness of the proposed freeway program in this area. It is probable that savings in the cost of present motor vehicle operations and reduction in losses resulting from accidents would more than balance the cost of the freeway program. As one student of the problem has said, "We are already paying for freeways without having them."

The proper method for raising necessary added revenues is a very complex and involved subject, to be determined only after giving adequate consideration to all of its state-wide phases. We believe that the proceeds of any added taxes for this purpose should be earmarked solely for the proposed program and should be imposed for a limited number of years. To assure expenditure of the proceeds in the metropolitan areas whose automobile owners are paying the largest part of the tax and where the major need exists, provision should be made for allocation of the proceeds within counties in proportion to their automobile registrations. It is believed that there should be modification of present restrictions against use of funds for necessary mass transportation facilities.

SUMMARY

THE TRAFFIC and transit problem is organic in character. Rather than remaining fixed, it is constantly growing and changing; its various aspects are closely inter-related. To keep abreast of the problem and to keep traffic congestion from strangling the movement and business of the city, adequate and continuous traffic engineering is necessary.

City government must be supported in its regulations to speed the flow of traffic, elimination of turns, restriction of on-street parking, etc.

Off-street parking in the downtown district can probably be provided by the co-operation of private interests, without city condemnation and ownership of parking lots or the creation of new governmental agency in the form of a Parking District Authority. Public approval should be given the proposed Pershing Square underground garage, assuming that it is made subject to fair and appropriate agreements and controls.

The construction of the freeways, upon which affected interests in the metropolitan community appear to be in agreement, will be a major contribution to better traffic conditions. These freeways are necessary and reasonable, and adequate financing should be provided for their accomplishment.

Mass transportation facilities, part rail and part bus, must be developed along with the freeway program. The integration of rapid transit and local rail and motor coach service improvements with the freeway design and construction is essential and can be accomplished now with proper planning. A part of this integration will require subways for mass transit use and conversion of present facilities in order to make possible one-way traffic routing on various streets.

REGIONAL PLANNING AND DEVELOPMENT SECTION

The Section's Meeting Record During This Study

MARCH 13, 1946—*Speaker:* J. E. Havenner, Traffic Engineer, Public Safety Department, Automobile Club of Southern California. *Subject:* "We Can Solve Our Traffic Problem. WILL WE?"

APRIL 19, 1946—*Speaker:* K. Charles Bean, Chief Engineer and General Manager, Board of Public Utilities, City of Los Angeles. *Subject:* "The Importance of Mass Transportation in Solving Our Traffic Problem."

MAY 3, 1946—*Speaker:* Carl Bush, Assistant General Manager, Downtown Businessmen's Association. *Subject:* "The Problem of Parking Space—Traffic's Downtown Bottleneck."

MAY 24, 1946—*Speaker:* Ralph T. Dorsey, City Traffic Engineer, Los Angeles. *Subject:* "Making the Most Effective Use of Our Present Traffic Facilities."

JUNE 13, 1946—*Speaker:* Lloyd Aldrich, City Engineer, Los Angeles. *Subject:* "The Freeway Program and Its Relation to the Traffic Problem."

JULY 16, 1946—*Subject:* "Lifstream of the City"—A General Electric film on the traffic problem, supplemented by comment by Stanley H. Lanham, General Consultant and Traffic Manager, Los Angeles Transit Company.

AUGUST 1, 1946—*Speaker:* Harrison R. Baker, Member, State Highway Commission; President, Pasadena City Planning Commission. *Subject:* "The State Highway Department and the Metropolitan Traffic and Transit Problem."

OCTOBER 23, 1946—*Speaker:* Milton Breivogel, Principal City Planner. *Subject:* "Summary of Section's Information on Traffic and Transit Problem; Discussion of Section's Future Agenda."

NOVEMBER 13, 1946—*Speaker:* E. E. East, Chief Engineer, Automobile Club of Southern California. *Subject:* "Recommendations of the Collier Committee's Consultants on California's Highway Problem."

DECEMBER 11, 1946—*Subject:* "The Section's Report on the Traffic and Transit Problem."

JANUARY 8, 1947—*Speaker:* John M. Peirce, Economist, Western Oil and Gas Association. *Subject:* "Financing Freeways."

JANUARY 22, 1947—*Subject:* "Reconsideration of the Section's Report on the Traffic and Transit Problem."

MEMBERS WHO ATTENDED ONE OR MORE MEETINGS OF REGIONAL PLANNING AND DEVELOPMENT SECTION DURING STUDY PERIOD

Arthur B. Gallion, *Chairman*

Alexander, Robert E.
Apter, David
Arkush, J. Robert
Baer, Herman L.
Barnard, Archer F.
Barrett, Vernon
Belknap, Raymond H.
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Bennett, Charles
Benson, George C. S.
Bernard, Robert J.
Berzer, Maurice
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Collins, D. J.
Eliot, Charles W.
FitzGerald, C. Grattan
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Harrell, Harrell J.
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Hofeller, Eugene D.
Hubon, I. A.
Huntley, Earl W.
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Johnson, Reginald D.
Jones, Alfred
Ketcham, Ronald M.
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Mann, J. A.
Manning, P. R.
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Moreland, Watt S.
Mowder, Fred L.
Palmer, Edwin O.
Pattee, Howard
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Ruck, W. F.
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Snyder, C. C.
Stebbings, A. E.
Story, Harold H.
Utt, Max Eddy
Vandenburgh, John
Van Wart, Roy M.
Verleger, P. K.
Wall, Henry V.
Weinhold, H. B.
Wigmore, George T.
Woods, D. W.
Zahn, Otto J.

How the Members Voted

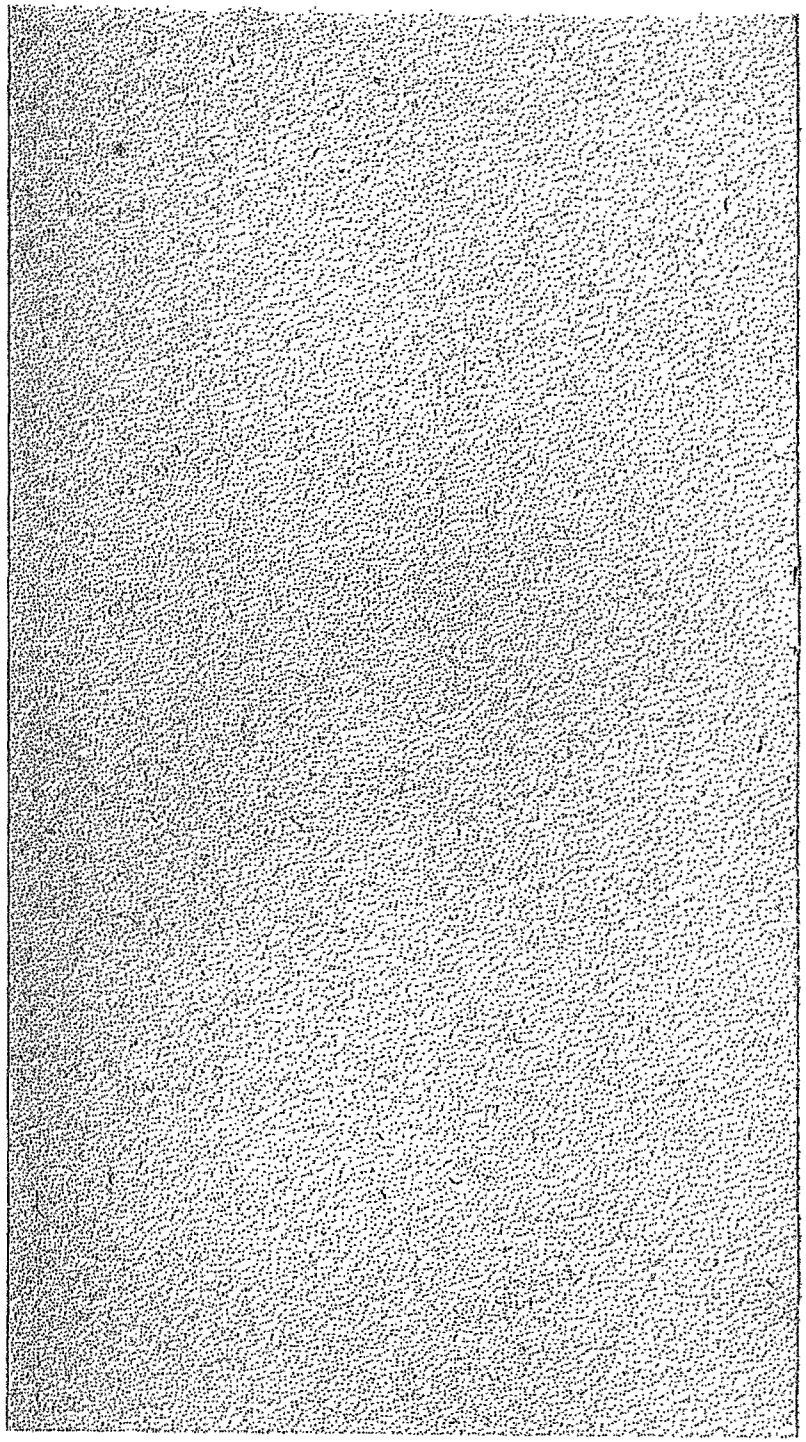
Members' Ballot on the Report:
"The Los Angeles Traffic and Transit Problem"

I approve the report	Yes 438	No 7
I favor continuous and adequate traffic engineering study	Yes 453	No 2
I favor handling the downtown parking problem through:		
(a) private efforts	Yes 339	No 35
(b) city condemnation of parking space	Yes 84	No 190
(c) creation of a Parking District Authority	Yes 257	No 76
I approve in principle of the underground garage at Pershing Square	Yes 439	No 23
I favor an extensive freeway program	Yes 441	No 7
To be financed in part by:		
(a) added tax on gasoline	Yes 396	No 38
(b) increased tax on trucks	Yes 381	No 33
I favor bus and/or rail transit operation in conjunction with freeways	Yes 429	No 20
I favor use of gas tax money to finance added right of way for such operation, authorized by constitutional amendment if necessary	Yes 411	No 41

TOWN HALL

Los Angeles
December, 1954

The Traffic and Transit Problem of the Los Angeles Metropolitan Area



The Traffic and Transit Problem of the Los Angeles Metropolitan Area

A REPORT OF
THE REGIONAL PLANNING
AND DEVELOPMENT
SECTION

Samuel E. Lunden, CHAIRMAN

TOWN HALL

LOS ANGELES, DECEMBER, 1954

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Traffic and transit is the most important problem of the Los Angeles Metropolitan Area. The longer a solution is delayed, the more the development of the area will be handicapped. This report explains why the following are urgent needs: (1) an adequately financed, comprehensive study of the problem, to develop (2) a long-range master plan for traffic and transit, which must have (3) the understanding and support of the broad body of citizens in all parts of the community.

Samuel E. Lunden, Chairman,
REGIONAL PLANNING
AND DEVELOPMENT SECTION

Introduction

THE AVERAGE CITIZEN, exposed to the ever-increasing congestion of freeways and highways and to the frustrations of trying to travel by bus or trolley, is well aware that moving people within the Los Angeles Metropolitan Area is an acute community problem.

In spite of numerous studies and reports on various aspects of traffic and transit, there is little real understanding of the problem. The man in the street feels that "something must be done," but has no idea what; he is inclined to hope for a single, quick solution, but has no means of judging the merits of the various proposals made from year to year.

The purpose of this report, resulting from a year's study by the Regional Planning & Development Section of Town Hall, is to define the problem in terms of the special characteristics of the Los Angeles Metropolitan Area, to examine the various proposed solutions, and to recommend a renewed attack upon the problem. It is beyond the scope of this report to recommend a detailed traffic and transit plan. Moreover, the report is primarily concerned with the movement of people and does not undertake to cover the related problems of moving goods within the community.

Since the terms "mass transit" and "mass rapid transit" are used frequently in the report, it seems useful to define them at the very start. Mass transit is here used to denote a system of transportation which carries large numbers of passengers along fixed routes. Mass rapid transit is used to denote mass transit operating at high rates of speed, at frequent, short-spaced intervals, generally on special rights of way reserved for their exclusive use.

Why People Travel Within the Community

IT IS POSSIBLE to catalogue only the principal reasons that lead a person in a complex urban society to move from one place to another. Without such movement, however, large communities could not exist.

The average car-owning family may make as many as ten trips per day. The family without a car makes fewer trips on wheels, more on foot.

Few families live within walking distance of the offices and factories

to which their working members must travel; mileage travelled to and from work often exceeds that of other daily trips combined. Efforts to get business, industry and their workers to accept staggered work hours have not been successful. Travel to and from work is the principal cause of traffic congestion at peak hours.

Those persons who use their cars during the day in the conduct of their business or work also contribute to the congestion at peak hours.

Many daily trips are made for shopping purposes. The increased use of the automobile for this purpose has led to the mushroom growth of supermarkets and suburban department stores, where parking facilities often take up more space than the store building themselves.

Americans in general and Southern Californians in particular are devoted to getting away from their homes for recreation. "Wouldn't it be fun to go to the beach?" "Let's go to the movies." "Why not run over to that restaurant in the Valley?" "Let's drop in on the Smiths in Pasadena." These are all reasons for hopping in the car or taking a bus or train.

Although neighborhood communities are more nearly self-contained and offer more diverse attractions than in earlier years, many cultural and recreational activities draw people long distances from their homes. In the Los Angeles area, also, most persons tend to have friends in various parts of the community rather than concentrate in their own neighborhood.

In short, whether for earning or spending money, or merely enjoying the opportunities of life in this large urban community, to live is to travel. To be confined, or to travel only with difficulty and expense, is to have one's life correspondingly curtailed.

If we assume as a goal the highest possible standard of living for the residents of a community, then the community's ability to move its people is an important factor in its economic efficiency. The transport system which undertakes to move these people is in the fullest sense a public service, as most private operators realize, and its costs must be weighed against the cost which the community as a whole must bear if adequate transit is unavailable.

Special Characteristics of the Los Angeles Area

The Los Angeles Metropolitan Area has certain special characteristics which make the solution of its traffic and transit problem particularly difficult. Major among these characteristics are size, low population density, and rapid rate of population growth.

Los Angeles is an area of great distances. In contrast to older Eastern cities, built close around a harbor or waterway, its urban area spreads over 1,233 square miles, with a distance of 65 miles from the Eastern to the Western boundary.

It is not surprising, therefore, that the average population density of the City of Los Angeles, 4,154 persons per square mile, is only a fraction of that of other major cities. Greater New York, by contrast, has an average population density of approximately 25,000 persons per square mile.

In 30 years, the County of Los Angeles has increased its population from 1,250,000 people to 4,900,000. This rapid growth of population has not alleviated the problem presented to transit planners by low population density because the growth has been outwards. The prevalent and quite desirable preference for single-family dwellings indicates that, while population will continue to grow, density may not increase and may even decline. At the same time, progressive development of new communities at the periphery makes for constant evolution and change in the travel patterns of the entire area.

The location of industry in recent years has been based upon the assumption that most, if not all, workers will be able to come to the plant in private automobiles. More recently, city and county planners have been zoning industrial districts near outlying residential centers, such as the San Fernando and East San Gabriel Valleys, in order to bring the job nearer to the worker and to locate plants where a pool of labor is near at hand. This "planned decentralization" is taking place without reference to possible plans for a unified transit system.

One of the most difficult elements of Los Angeles' traffic problem is that of jurisdictional boundaries. Forty-six incorporated cities and the unincorporated areas of Los Angeles County are part of one urban area, and urban development is spilling over into Orange and San Bernardino Counties. Planners have had to cope with this complex jurisdictional situation in dealing with water supply and sewage, smog and other area-wide problems, and it is obvious that no effective transportation plan can ignore it. Within this great urban area, the average citizen's travel requirements take him across political boundaries almost daily.

The jurisdictional problems include: (1) dissimilar local traffic regulations; (2) multiple jurisdictions requiring the approval of several authorities where transit systems cross boundary lines; (3) inadequate coordination of local transit with area-wide systems of transportation; (4) jurisdictional rivalries and pride of office in one jurisdiction as against another.

To these special characteristics must be added the Southern California climate, which favors year-round use of the automobile. Finally, the highly diverse travel pattern—with traffic moving in all directions and not primarily along a North-South or East-West axis—makes it difficult for transit lines to build up a load on any one route or to supply frequent and convenient service over a wide variety of routes; this further increases the use of private automobiles and dependence on them.

History of Mass Transit in Southern California

In its early years, the Pacific Electric Railway provided swift and efficient service between the central business district and outlying areas. In 1900, the PE made the trip from Los Angeles to Long Beach in less time than it takes today. Between the turn of the century and the early 1920's, population growth tended to develop along these rail routes. From the 1920's on, the mass-produced automobile made real estate development and residence location increasingly independent of rail transportation. As roads were built to accommodate the automobile, the PE found its schedules slowed down more and more as its original right of way, with few crossings, was cut by increased crossways, greater auto traffic, and the necessity for more passenger stops. Today the once efficient passenger service of the Pacific Electric rail system is in the final stages of being abandoned.

The numerous narrow gauge trolley lines which supplemented the PE system at the turn of the century were merged into the Los Angeles Railway Company in 1910 by Henry E. Huntington. He further extended these lines into such communities as Huntington Park, Inglewood and Garvanza (now Highland Park) in order to promote his extensive real estate holdings in these areas.

By 1926, the bus was coming into its own as competitor of the trolley. In the years since 1926, trolley and rail lines have been increasingly replaced by busses so that today the Metropolitan Coach Lines (successor to the passenger service of the PE) runs busses on all but six of its 40 lines. Fares, however, have risen steadily. Patronage has fallen even while the community has been growing.

During World War II, the mass transit lines, because of automobile shortages and gas rationing, temporarily gained a new lease on life and proved their ability to move large numbers of people. Dependence on the private auto was so established in this area, however, that the government had to relax restrictions on gasoline and tires in order to enable

workers to get to vital war plants; it took both the private auto and mass transit to meet the requirements of worker transportation. A measure of the scattered travel requirements at that time is the fact that car-occupancy never exceeded 1.75 passengers per auto, despite employer-regulated car pools, appeals to patriotism, and wartime controls.

Postwar relaxation of controls brought an upsurge in private car use, with increased traffic congestion and rising accident tolls. Business decentralization was accelerated, shopping centers sprang up in new residential areas, and, by 1949, the great freeway building program was underway.

After the war, the transit companies made further improvements, modernizing busses and replacing some heavily travelled trolley rail lines with electric trolley coaches. But, in general, the mass transit system failed to provide facilities attractive enough to compete with the increasingly convenient modern automobile. The result has been a further decline in the use of mass transit, a decline which has not yet been reversed.

Existing transit lines, under the management of 21 transit companies, often do not provide transfers and trip diversification. Anyone who has tried to utilize public transit along other than established grooves of travel is witness to this difficulty.

Although our transit is no slower on a miles-per-hour basis than that of other cities, our great distances make the speed of present transit inadequate, particularly if public lines are to compete with the automobile. In addition, many observers believe that the discomfort, especially during rush hours, of present facilities is a major deterrent to greater patronage.

One further development has been the routing of busses on some of the new freeways. Increased speed and efficiency seems to have brought patronage to these routes and, as will be seen, some people now advocate busses-on-freeways as a major contribution to solution of the area's transit problem. To date, however, the trend of the area as a whole has been toward greater, rather than less, dependence on the private automobile.

Although the convenience and other advantages of the private automobile are readily apparent, dependence upon it is not without its disadvantages to the individual motorist and to the community. Most obvious of the disadvantages to the individual is the cost of operation. Major among the disadvantages to the community are the costs of providing freeways, highways and parking facilities and the difficulty and cost of regulating an ever-increasing flow of traffic. The fact that these disadvantages increase as population grows and as the number of automobiles multiplies gives rise to the recurrent demands for a solution to the problem of traffic and transit.

The Penalty for Failure to Provide Adequate Public Transit

A FATALIST MIGHT SAY, "We may not get around as rapidly, cheaply, safely or comfortably as we might like, but we do get around. Why try to do anything about it?"

The answer is simple. Traffic congestion will inevitably grow worse, as more people and more automobiles pour into Los Angeles. In fact, beyond a certain point, the traffic situation is likely to deteriorate in more than direct ratio to the increase in population and automobiles. Once that point has been reached, traffic congestion will become a major deterrent to further community growth. Inadequate transportation facilities will reduce the labor force available to the industrialist and the range of potential customers available to retail stores. People will find Los Angeles a less attractive place in which to live and work, and business establishments will tend to locate elsewhere.

Those cultural, recreational and merchandising activities which can best be conducted at the center of a large urban area will be further handicapped by the continuing deterioration of the central district. People will be forced to travel longer distances. The tendency will be for the traffic and transit problem to become self-perpetuating and self-aggravating.

Efforts of Other Major Areas to Solve the Problem

LOS ANGELES make take some slight comfort from the fact that virtually every other major metropolitan area is having equal or greater difficulty in overcoming its transportation problem. Traffic congestion in older and more concentrated communities has, in some cases, made public transportation other than on private right of way a sort of crawling nightmare. Everywhere, the private auto has tied up roads and hurt mass transit facilities.

A variety of corrective measures are being applied across the country. Most of them appear to favor the use of rapid transit facilities on private rights of way, but high cost and limited demand have obstructed this solution. Millions of dollars are being spent for freeways, grade separated rail facilities, street-widening, parking lots and the like. Often these improvements have merely attracted more vehicles, caused more congestion, and compounded existing problems.

Rail lines in other metropolitan areas, as in Los Angeles, have given way in great part to busses or trolley coaches, and efforts have been made to control rigidly the costs of operation, and to build faster and larger carriers.

Where rapid transit systems are being built or expanded, it is often on established sites or from already begun projects. Philadelphia is completing the Locust Street subway which had been started many years ago. Boston is fulfilling previous commitments in subway and overhead rapid transit, and Chicago is extending some of its lines. Cleveland is laying rail and building overhead-on grade separation structures built some years ago. In many cases, freeways are being planned to serve the same general areas served by transit facilities.

It is perhaps significant that all of the above are government-financed projects. The general feeling in other metropolitan areas is that rapid transit projects cannot be justified to private enterprise on the basis of revenues alone. The disparity between investment and possible revenue, together with increasing competition from the automobile, make private capital unwilling or unable to shoulder the financial burden. No major rapid transit system in the United States has been built by private enterprise since 1907.

Transit Proposals for Los Angeles

OVER THE YEARS, a variety of solutions and partial solutions for the Los Angeles traffic and transit problem have been advocated. Yet there has always been, in the words of the University Presidents' Report of 1950, "a divergence of opinion regarding transportation of such magnitude as to paralyze action."

Much the same situation prevails today. The field is crowded with suggestions, some of which we will examine briefly. Those who believe that bus service can adequately handle growing transit needs argue that the city, because of its nature, cannot support a rail rapid transit system. They approve of an accelerated freeway program, with provision made for busses to utilize the new roads.

Rail advocates agree as to the necessity of mass rapid transit, but are divided between the below-ground and the above-ground schools. Other divisions of opinion cleave the rail rapid transit enthusiasts, at whose extremes are the single-line advocates (such as monorail) and the comprehensive mesh or grid-pattern planners (such as the Babcock subway proposal).

In the light of the difficulties of the Pacific Electric, few advocate increased use of trolley cars on public streets, although some foresee further use of electric trolley coaches, running on pneumatic tires rather than rails.

Arguments For and Against Particular Transit Proposals

EXPRESS BUSSES ON FREEWAYS

The proposal for expanding the use of busses on the freeways contemplates that busses would move at the speed of other traffic, picking up and dropping passengers in service roadways or bus turnouts. At either end of their run busses would leave the freeways and in some cases operate for a distance on surface streets. Outlying freeway bus stops might take on the aspect of suburban transit stations, with riders arriving at and leaving such stops via private automobile or feeder busline, with some provision made for the parking of private cars.

Arguments presented for:

1. In this area of low population density, busses are the most economical type of transit.
2. They can be operated on a profitable basis by privately owned, tax-paying transit companies.
3. To the extent that freeway-users ride in busses rather than in private autos, freeway congestion will be relieved.
4. A minimum of additional taxes will be required.
5. Busses provide the most flexible type of transit since they can be re-routed as required by changing needs and conditions.
6. Busses can swing off the freeway and take passengers closer to their destinations than can a fixed rapid transit system.

Arguments presented against:

1. At the present rate of construction, the contemplated freeway system may not be completed for another quarter of a century.
2. Even after the freeway system has been completed, many areas will not be within a reasonable distance of freeways.
3. Adding bus traffic to auto and truck traffic on the freeways will increase the accident hazard and make more difficult the use of the freeways by those for whom they were primarily built.
4. Freeways alone cannot solve the problem of traffic congestion, particularly in view of anticipated increases in population and in the number of private motor vehicles.
5. Busses on freeways are not as satisfactory as transit vehicles operating on their own rights of way. One auto, stalled on a freeway during a peak traffic period, can seriously disrupt bus schedules. Because of the lack of an assured saving in time, busses on freeways will not attract passengers away from their private automobiles.

RAIL RAPID TRANSIT ON FREEWAYS

The Rapid Transit Action Group, a locally organized committee, recommended in 1948 that rail rapid transit be incorporated in center strips of those freeways where the load would warrant, that bus lines be put on other freeways, and that a subway be constructed under Broadway to serve the downtown area. Although features of other transit plans were included, the key proposal was the rail lines within the freeways.

Estimating the cost of such a system at $310,000,000, the group recommended public financing in the belief that private financing would not be feasible.

Arguments presented for:

1. A rail system would carry more passengers and carry them more rapidly than would a bus system. It would be in a better position to attract passengers away from their private automobiles.
2. It would be less expensive to construct a rail rapid transit system in conjunction with freeways, simply acquiring a wider right of way, than to construct such a system separately.
3. Freeways are planned to coincide with, or closely parallel, the main routes of travel. These are also the most suitable routes for rail rapid transit.

Arguments presented against:

1. The major freeways connecting with the central portion of the city have been built without rail lines; it is now too late to consider this proposal even if it would have been feasible at the time it was first proposed.
2. Rail rapid transit operates at a deficit in cities with much higher population density. It could not possibly pay its way in Los Angeles.
3. The gasoline taxes which finance the freeways can, under present laws, be used, and should be used, only for roads and highways. Land for freeways is acquired and freeways are constructed as funds from the gasoline tax become available. To try to tie in with this acquisition and construction program the program necessary for rail transit would be extremely difficult if not impossible and would greatly handicap and delay the freeway program.

4. The public financing required points to the probability of public ownership and operation, a transit bureaucracy and a transit issue in local politics.

MONORAIL RAPID TRANSIT

Monorail, as its name implies, consists of a single overhead rail, from which are suspended electric trains, capable of fast rates of speed. The rail line can run over freeways, streets, or private rights of way. It can be fed by bus lines at the stations along its route.

In 1951, the State Legislature created a Metropolitan Transit Authority, authorized to study the feasibility of monorail rapid transit along a route to be within a specified eight-mile wide strip running from the San Fernando Valley to Long Beach. The Authority employed the engineering firm of Coverdale and Colpitts, whose report suggested the feasibility of the monorail proposal providing that the financing could be accomplished through tax exempt bonds and providing that the monorail operation would be free of regulation by the State Public Utilities Commission.

The route recommended stretched from Panorama City in the San Fernando Valley through Hollywood, through downtown Los Angeles (partly by subway) and then to Long Beach. There would be 17 stations along the 45.7 mile route. Most stations would be provided with parking lots for 325 cars.

Trains of six cars, each seating 67 passengers, would be operated at an average speed of 41 miles per hour over the length of the line and at three-minute intervals during peak hours. The system is estmated capable of handling 79,000,000 passengers a year. The cost of the system is estimated at $165,000,000.

Arguments presented for:

1. Monorail provides the speed, safety and carrying capacity of a rail rapid transit system operating on its own right of way and at the same time avoids the excessive costs involved in construction of a subway system or in the acquisition of right of way for a surface rail system.
2. Monorail requires a minimum of structure and operates in relative silence; objections to an elevated railroad do not apply.
3. Construction, operating and maintenance costs are low. Because of the unparalleled safety of monorail operation, insurance costs—an important cost factor in the operation of bus and streetcar lines—will also be low.
4. Although this particular monorail proposal does not include a comprehensive system for all parts of the community, half of the

population of Los Angeles County is situated close enough to the proposed route to be served by the line itself, independently or in conjunction with feeder bus lines.

5. The proposed monorail line can be completed in the relatively short period of four years.
6. Special treatment in tax-exempt financing and in exemption of monorail operation from Public Utility Commission regulation is justified by the amount of good that the monorail system will accomplish for the community.

Arguments presented against:

1. This monorail proposal is not a mass transit system, but merely a single line. It would serve only about 15% of present transit patrons in the metropolitan area. It would depend upon surface lines for transfer passengers but there is no demonstration that surface transit operations could be or would be coordinated or that transfer privileges would be feasible. If transfer privileges were not available, a pasenger having to pay a local bus fare at both ends of his monorail trip might well find it less expensive to drive his own car.
2. Monorail might fail to pay its own way and at the same time do great damage to existing transit operations by competing with their more favorable routes.
3. It is doubtful that the factors which make an elevated line damaging to property values can be eliminated in the case of monorail. Cost of construction might be raised to unforeseeable heights by damages accruing to owners of adjacent property.
4. The only existing monorail line was built in Germany around the turn of the century. In the fifty years since no one has found monorail an advantageous answer to a transit problem. Before a commitment to monorail is made, further study should be made as to whether it has in fact any engineering or economic advantages over conventional grade-separated rail transit systems. There is no conclusive engineering opinion that it has such advantages.
5. Granting tax-exemption and exemption from rate-fixing control is too high a price to pay for a monorail system.

SUBWAY GRID PLAN

A system of single-track, one-way loop subways has been proposed by Henry A. Babcock, consulting engineer, for the central part of the Los Angeles Metropolitan area, with surface transit to make connections for outlying communities. A new type of subway system, designed to meet the needs of Los Angeles, would be built in a mesh pattern, instead

of trying to adopt here the radial pattern in such cities as New York.

The stations would be located on one-mile centers, approximately equidistant in all directions, so that no one would have more than a few blocks to walk to a station. Within the squares formed by the intersections of the East-West and the North-South loops, local trains would run in circles. By synchronizing the operation of the local trains with that of the trains on the main loops, it would be possible for a passenger to travel, with not more than two changes, in any direction with equal facility. In the core area, all or almost all public transit could be handled by the subway system. It could be extended outward as conditions warrant; in the interim; the trains could run on the surface or on elevated structure in the outlying areas.

The cost of such a system, covering the 175 square mile area of Los Angeles, would be about a billion dollars.

Arguments presented for:

1. Los Angeles is one of the largest and can be one of the most modern of the world's cities. It must think and plan accordingly. Half-way solutions will only make the present situation worse and irretrievably handicap the city's future.
2. The main requirement of an adequate transit system for this dispersed community is that it permit passengers to go in a reasonably rapid and direct manner from any section of the city to any other section. Neither existing transit lines, other transit proposals nor the private automobile, even after freeway completion, can fulfill this basic requirement.
3. No other transit proposal offers to free the streets of bus and trolley traffic and make them available for those who drive their own cars.
4. The cost is not disproportionate to what would be accomplished.

Arguments presented against:

1. Los Angeles cannot afford to stake its transit future on a blueprint. This is a completely untried proposal and, in the several years since it was first advanced, has failed to attract any significant support.
2. The always high costs of subway construction would be added to in this proposal in that carrying out the pattern required for the proposed type of synchronized operation would mean condemnation of private property.
3. People who have to ride in subways in Eastern cities intensely dislike doing so. Building subways in Los Angeles would be the poorest possible way of attempting to get people to use public transit instead of operating their own automobiles.

Criteria of an Adequate Solution

In judging the foregoing and other proposals for the solution of the traffic and transit problem of our area, it is desirable to have in mind standards for judging their desirability and adequacy. While it may be difficult for any one proposal to meet all of the following suggested criteria, presence or absence of the ability to meet most of them is likely to determine the success or failure of the proposal. The following criteria are suggested:

(A) An adequate solution must be formulated on the basis of impartial findings by a body uncommitted to any particular solution.

(B) It must be acceptable to and supported by the community as a whole.

(C) It must be area-wide, designed to cover and serve all parts of the metropolitan area.

(D) It must consider the movement of goods as well as of people.

(E) It must provide for the coordination of all forms of public transit.

(F) It must be long-range, taking into account probable future growth and changes in the residential and industrial patterns of different areas.

(G) It must be economically sound, weighed in terms not only of the transit facilities, but also of their effect on real estate values and on the future growth and development of Los Angeles.

(H) It must include the basic legislative program necessary for its implementation.

(I) It must include a reasonable timetable for the completion of the program.

(J) The coordinated system must include the following elements:

1. Fast transportation.
2. Safety
3. Convenience
4. Comfort
5. Adequate passenger capacity
6. Trip diversification—ability to get from any point within the traffic pattern to another in a reasonably direct manner.

(K) It must be accompanied by an intensive campaign to encourage the public to use its facilities.

San Francisco Makes a Fresh Start

San Francisco is now making a broad and comprehensive approach to its traffic and transit problem. A Bay Area Transit Commission was created by the State Legislature in 1951. This Commission is composed of 26 members, representing nine Bay Area counties. Its purpose is "to study and investigate rapid transit problems in the Bay Area, to aid the cities and counties in investigating their transit needs, to combine and correlate findings, and to develop a master, coordinated rapid transit plan, including the cost thereof."

The Commission, with its original appropriation of $50,000, held 17 meetings, formed committees and advisory boards, and hired an engineering firm to report on current and estimated 1970 passenger movements, as well as to analyze previous studies on mass transit and highway transportation in the area.

At the end of 1953, the Commission made its preliminary report to the State Legislature and submitted a proposed draft of an Act for creating a Transit Authority.

The preliminary report concluded that a rapid transit system in its own right of way, free of intersecting traffic, was necessary; that $750,000 should be spent over a three-year period in making studies and plans; that it is the joint responsibility of, and to the joint interest of, the State and the Bay Area; and that the Counties should share the cost with the State.

The Legislature thereupon appropriated $400,000 and the Counties appropriated $350,000 for the detailed study and plans. Since then a contract for a study and development of plans for rapid transit facilities until 1990 has been made with a New York firm.

San Francisco was able to approach the Legislature with the kind of internal unity which Los Angeles must achieve before progress can be made. Appropriate legislation and financing could probably be obtained by the Los Angeles area if its 46 cities and the county could coordinate their efforts.

A Proposal for the Los Angeles Area

In 1950, the Board of Supervisors of Los Angeles County asked the Presidents of the California Institute of Technology, the University of California, the University of Southern California, and Stanford University and the Provost of the University of California, Los Angeles, to make recommendation to them of an appropriate approach to a solution to the traffic and transit problem of this area. The University Presidents'

Report recommended a comprehensive, area-wide study which would include investigation of (1) the county's pattern of growth; (2) the relationship of a coordinated rapid transit system to healthy economic development; (3) economic and engineering features of all possible rapid transit systems—busses on freeways, subways, rail on freeways, rail on private property, monorail or other; (4) where rapid transit is needed; (5) how the final plan should be financed and (6) how the system should be owned and operated.

This comprehensive, area-wide study has never been made and we do not yet have the facts on which to base a recommendation of a comprehensive, area-wide solution to our problem.

Conclusions

Our basic recommendation is that a comprehensive study of traffic and transit problems in the Los Angeles Metropolitan Area be undertaken in 1955 under the direction of an Agency appointed for this purpose.

The State Legislature should be asked to enact whatever legislation is required to bring such an Agency into being.

The Legislature should be requested to provide this Agency with an initial appropriation to carry out the survey, with the requirement that the survey be completed in 1957.

A definite time schedule should be established for the entire program. The supporting financial program must be geared to that time schedule. A tentative timetable for an initial program to cover our needs for the next ten years might be as follows:

1955—Legislation authorizing investigation and study

1957—Completion of initial investigation and study; legislation authorizing programming and financing

1959—Completion of initial programming and financing.

Implementation of the program might well be started before 1959 and completion of the basic stages of the program should occur within three to five years after 1959.

The relatively slow progress being made in the Freeway Program, primarily because financing was not realistically geared to needs, can be avoided by proper coordination of the planning, financing, and, if construction is required, the construction aspects of the program.

The proposed Agency should be empowered to appoint such advisory committees as it finds desirable. One of these might well be a Citizens Committee, representative of the different sections of the metropolitan area and including civic, industrial and professional lead-

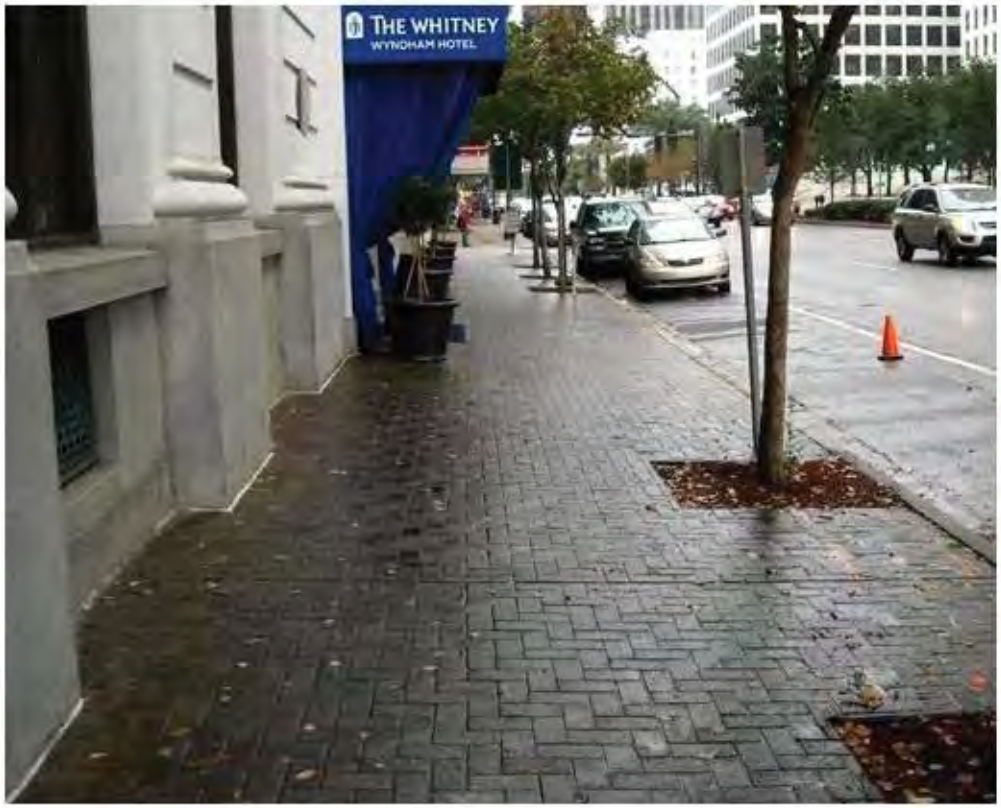
ers. Another might well be a committee of technical advisers, made up of government and private experts in different phases of the problem.

The proposed Agency should have as part of its responsibility the alerting of the community to the needs of the area, to the consequences of failure to act and to the benefits which an appropriate solution would bring. If its recommendations are to result in action, the support of citizens in all parts of the metropolitan area will be required. For the same reason, the Agency must stay on the job until the program is planned, financed, and put into operation. If public support flags, so flags the program.

If a plan for enabling legislation is to be submitted to the Legislature in 1955, the citizens of the Los Angeles Metropolitan Area must join without delay in supporting such a proposal.

Comment Letter PC10 Attachments

GREAT EXAMPLES OF DECORATIVE, PEDESTRIAN-FRIENDLY SIDEWALKS



ANOTHER EXAMPLE OF A GREAT PEDESTRIAN-FRIENDLY SIDEWALK, WITH DECORATIVE PAVEMENT

charles
SCHWAB

CVS pharmacy

Comment Letter PC11 Attachments

Matisse
24
ALDO

Local
Metro Local

720
SANTA MONICA
025
Rapid

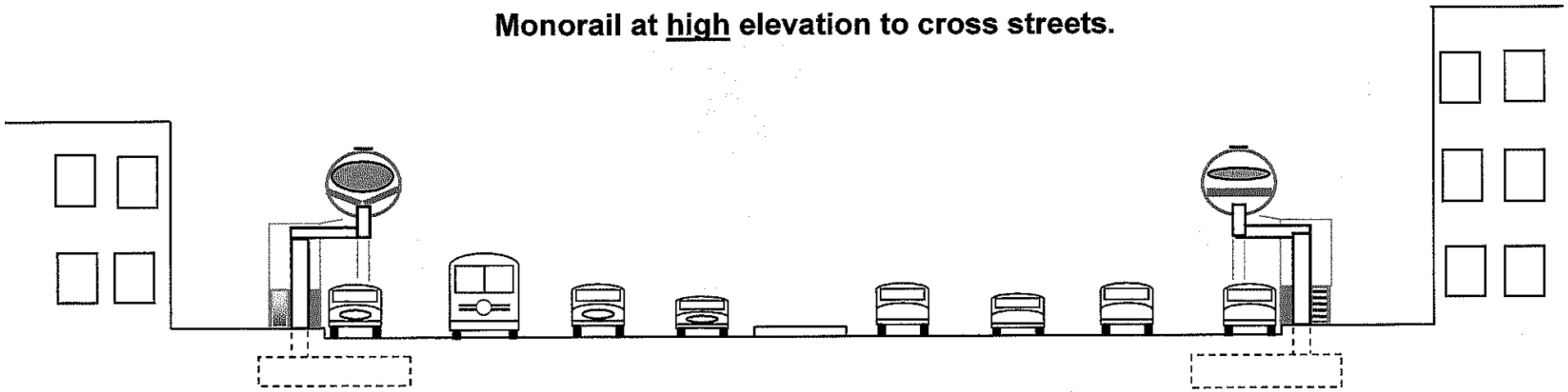
6507

66 FRANKFORD
TRANSPORTATION
817
817
SEPTA
See Saw
Day Care &
Learning Center
See Saw

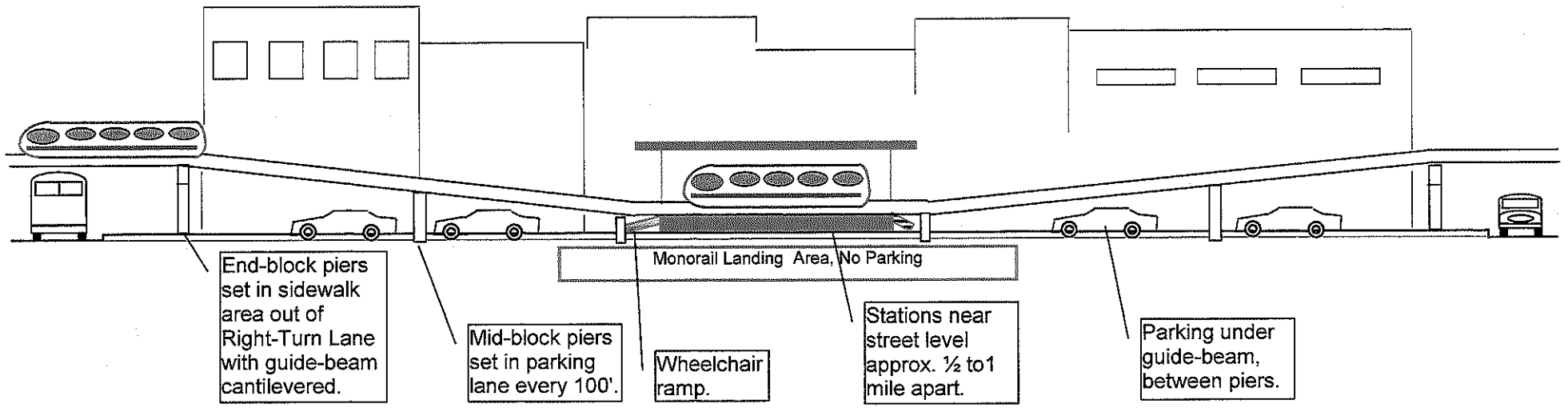
Comment Letter PC12 Attachments

Street-Level Loading Monorail.

Monorail at high elevation to cross streets.



Monorail at low elevation for loading passengers.
(Stations are 200' to 300' from corners giving guide-beam space to rise before a cross street.)



Proof that Monorails can run both at Street-level for Loading, at elevation for crossing Cross-streets, and even in tunnels under LAX.

Intamin's small "people-mover monorails" in Hamburg might be perfect for replacing buses in LA.

Okinawa Monorail at street-level boarding.

Metrail's self-contained, self-powered monorail.
No Electrical feed required on guide-beam or overhead.

Chinese Monorail at street-level for loading.….

and at elevation NOT taking up street lanes like BRT's.