Appendix C

Notice of Preparation/Scoping

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May 22, 2014

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING

Case Number:	ENV-2014-1458-EIR, CPC-2014-1456-SP, and CPC-2014-1457-SP
Project Name:	Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan (CTCSP/WLA TIMP) Specific Plans Amendment Project
Project Location:	Westside of Los Angeles - Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan areas, including the communities of Brentwood, Century City, Mar Vista, Palms, Playa Del Rey, Playa Vista, Venice, Westchester and Westwood.
Community Plan Areas:	Brentwood-Pacific Palisades, LAX, Palms-Mar Vista-Del Rey, Venice, Westchester-Playa Del Rey, West Los Angeles, and Westwood.
Council Districts:	5 and 11
Scoping Meeting Dates:	June 5 and June 9, 2014
Due Date for Public Comments:	June 23, 2014

The proposed project consists of amendments to the Coastal Transportation Corridor Specific Plan (CTCSP) and West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP). The amendments would include an update to the development/traffic impact fee program, including revisions to the fees, trip generation rates, exemptions, and in lieu credits, and an update to the list of transportation improvements and mitigation measures to be funded, in part, by the impact fees collected from new development. Other proposed changes would include administrative amendments and minor revisions consistent with updates to transportation policies and/or integration of current best practices.

The CTCSP and WLA TIMP were adopted in 1985 and 1997, respectively, with the purpose of establishing a traffic impact fee program[1] to be assessed on new development and intended to assist in the implementation of future transportation improvements on the Westside. The traffic impact fees were established by specific plan ordinances and have been a part of the development approval process in the Westside since adoption.

The City of Los Angeles Department of City Planning (Lead Agency) will prepare an environmental impact report (EIR) for amendments to the CTCSP and WLA TIMP identified herein (proposed project). This Notice of Preparation (NOP) is being distributed to applicable responsible agencies, trustee agencies, and interested parties as required by the California Environmental Quality Act (CEQA). Comments from interested agencies are requested as to the scope and content of the environmental information that is pertinent to each agency's statutory responsibilities in connection with the proposed project.

Study Area

The study area is in the western portion of the City of Los Angeles (the "Westside") and encompasses the Coastal Transportation Corridor Specific Plan (CTCSP) area and the West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP) area (see Figure 1, Regional Location).

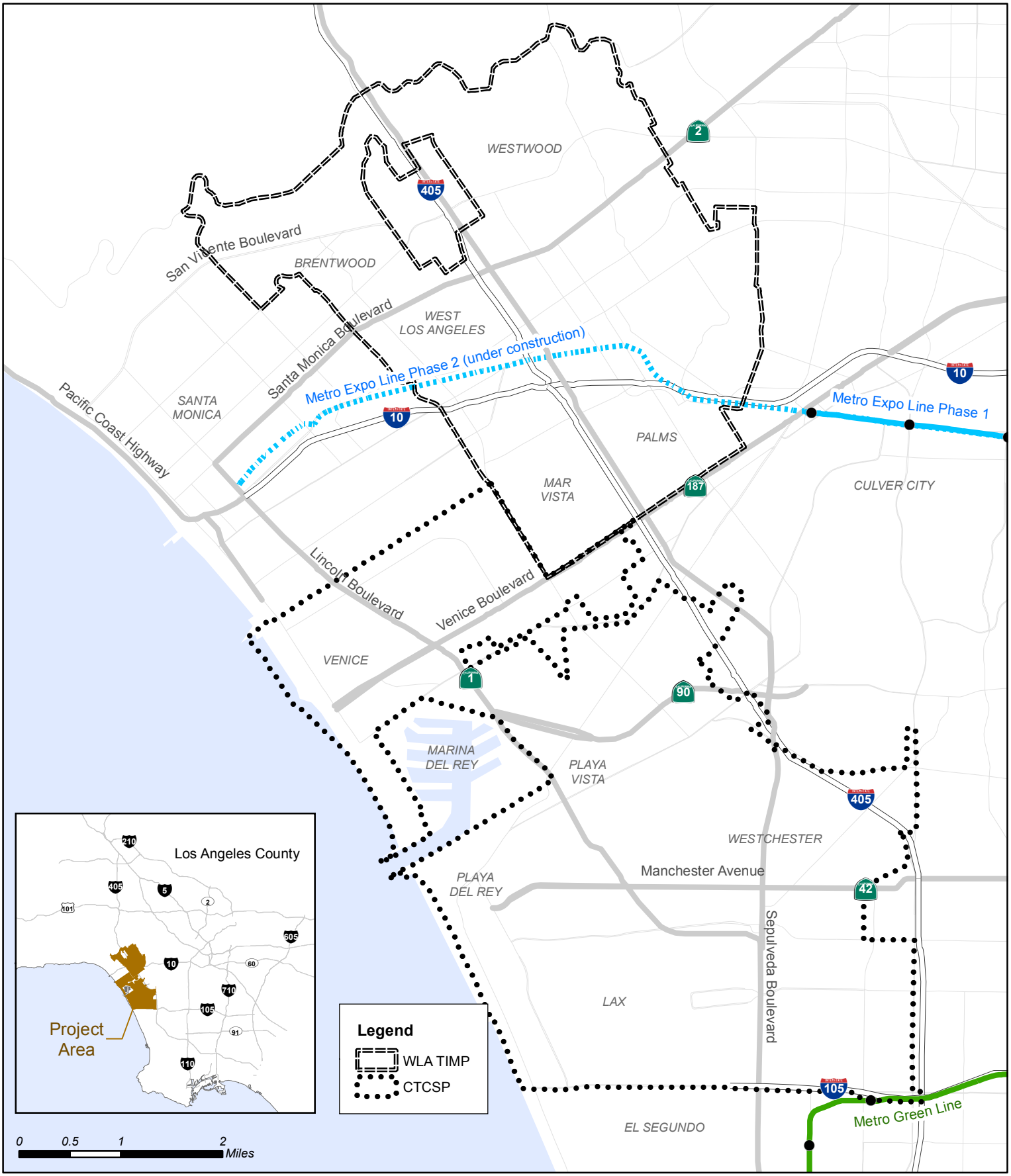
As shown on Figure 2, the CTCSP area includes all or parts of the Westchester-Playa Del Rey, Palms-Mar Vista-Del Rey, and Venice community plan areas and the Los Angeles International Airport (LAX) Plan area. The CTCSP area is generally bounded by the City of Santa Monica on the north, Imperial Highway on the south, the San Diego Freeway (Interstate [I]-405) on the east, and the Pacific Ocean on the west.

As shown in Figure 3, the WLA TIMP area includes all or parts of the Westwood, West Los Angeles, Brentwood-Pacific Palisades, and the Palms-Mar Vista-Del Rey community plan areas, and is generally bounded by the City of Beverly Hills/Beverwil Drive/Castle Heights Avenue/National Boulevard/Hughes Avenue on the east; Sunset Boulevard on the north; the City of Santa Monica and Centinela Avenue on the west; and Venice Boulevard on the south.

Project Description

The proposed project consists of amendments to the CTCSP and WLA TIMP. The updates of the CTCSP and WLA TIMP, as derived from the Westside Mobility Plan (WMP), are consistent with the City's multimodal approach to transportation planning and apply such principles to the Westside in a more targeted manner. The details are summarized as follows.

[1] Also referred to as a Transportation Impact Assessment (TIA) in the CTCSP and WLA TIMP.



Basemap Source: U.S. Census Bureau, Geography Division, 2010

Figure 1
Project Location Map

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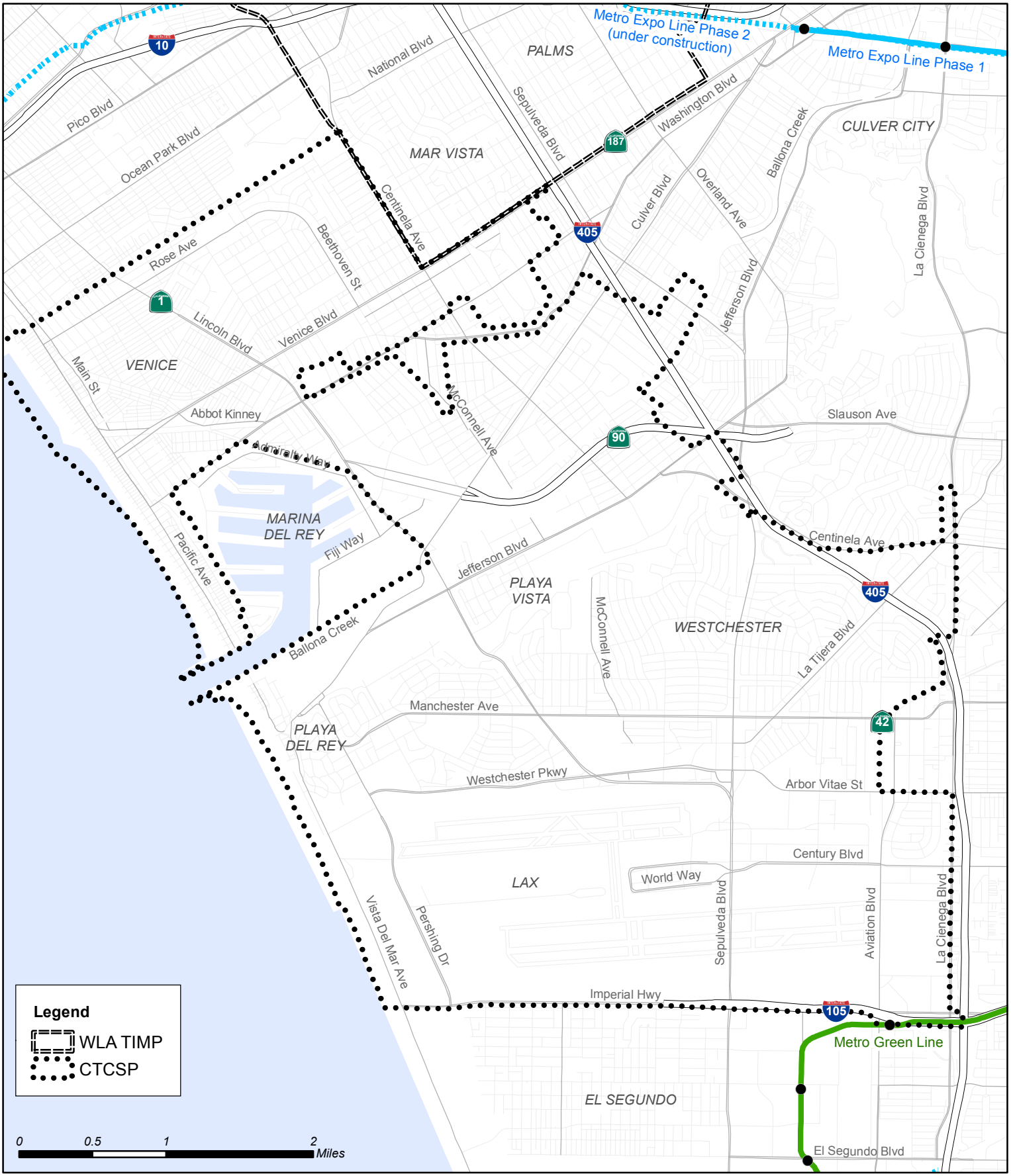

Basemap Source: U.S. Census Bureau, Geography Division, 2010

Figure 2
Coastal Transportation Corridor Specific Plan Area

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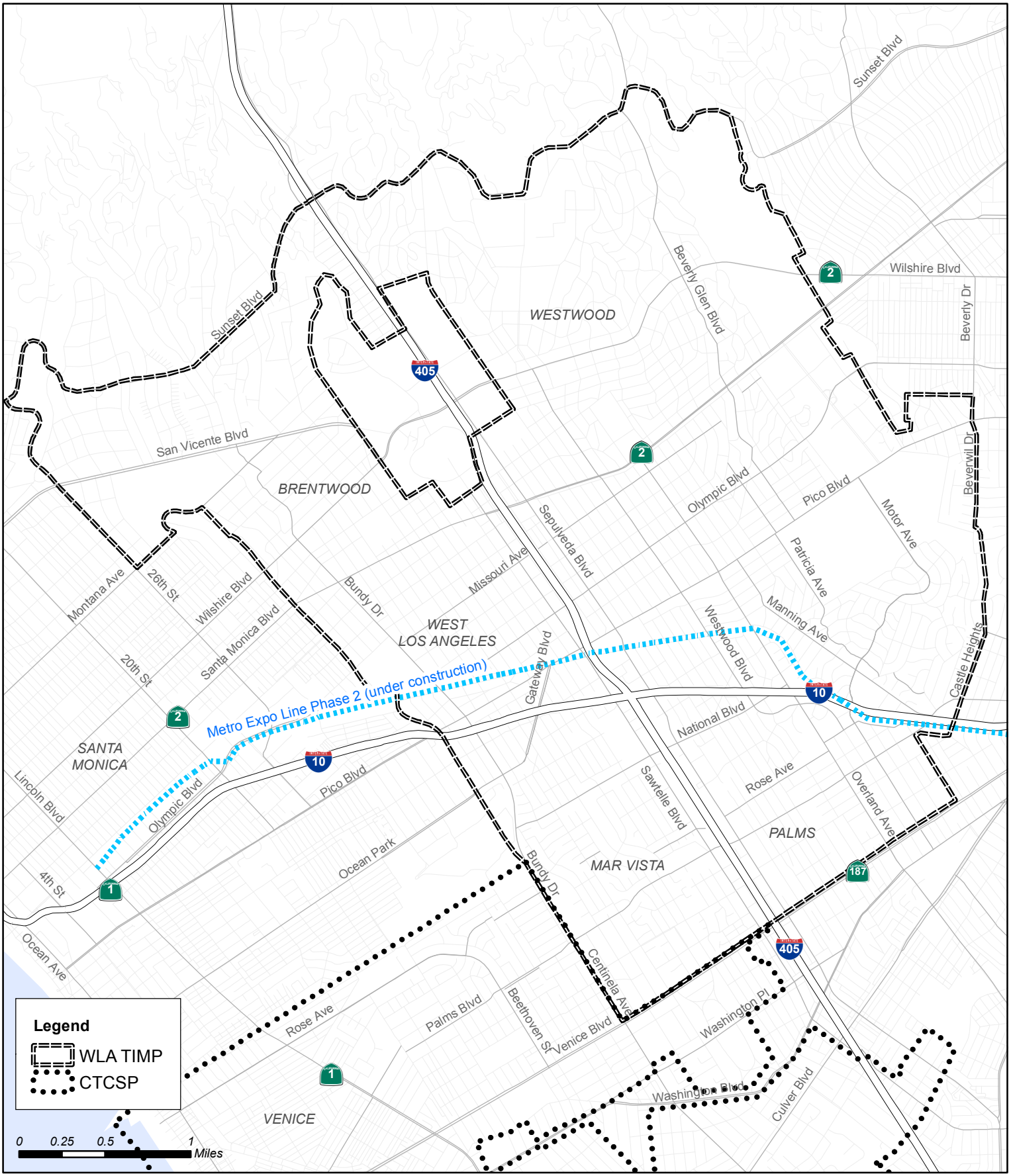

Basemap Source: U.S. Census Bureau, Geography Division, 2010

Figure 3
West Los Angeles Transportation Improvement Area

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Amendments to Impact Fee Assessment Methodology

Fees

The proposed project would revise the traffic impact fees required under each specific plan and corresponding ordinance. To determine the appropriate fee updates, a study is currently being prepared to establish the nexus between new development that occurs in the study area and the need for new and expanded transportation facilities and programs, including transit, bicycle and pedestrian oriented improvements in addition to the more traditional roadway and signalization improvements. After establishing the nexus, the study will calculate the development impact fees to be levied for each land use in the areas of benefit, based on the proportionate share of the total facility use for each type of development. These revised fees will then be incorporated into the proposed specific plan amendments.

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 Westside Mobility Plan, alternative performance measures, such as vehicle miles of travel (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 traffic impact fee updates is likely to be 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.

Trip Generation Tables

Each specific plan has trip generation tables (Appendix D in the CTCSP and Appendix A in the WLA TIMP) which assign trip generation rates for specific land uses. The trip generation rates are used to project the number of future trips associated with a new development and that trip number is used to assess the traffic impact fee. Under the proposed project, the trip generation tables for each specific plan area would be revised based on the outcome of the nexus study discussed above.

Traffic Impact Fee Exemption

In each specific plan area, some land uses, such as schools, residential uses, and places of worship, are exempt from paying the traffic impact fee. The proposed amendments propose to remove the exemption for single-family and multi-family residential development. Other revisions to the exemptions in both the CTCSP and WLA TIMP may also be considered.

In-Lieu Credits

The list of improvements that are eligible for in-lieu credits against the traffic impact fee may be revised and expanded.

List of Transportation Improvements

The proposed amendments include updating the list of transportation improvements funded in part by the traffic impact fees in each specific plan area (Appendix B and Appendix C of the CTCSP and Appendix C of the WLA TIMP). The updated lists of transportation improvements would replace completed projects (see Table 2) and establish new projects and programs. The new projects, identified through an analysis of completed projects and a public outreach component of the Westside Mobility Plan process, are aimed at improving the existing transportation network, enhancing system capacity, reducing vehicle trips and miles traveled, and improving transit connectivity. The transportation improvements proposed for inclusion in the CTCSP and WLA TIMP amendments are projected to be implemented by 2035.

The types of projects and programs that would be included as Transportation Improvements for each specific plan are described below. The following list is not exhaustive but representative of the types of improvements being proposed.

- Roadway projects
    - intersection improvements such as turn-lane or safety improvements at major intersections, improving traffic flow along major arterials, and widening of the Lincoln Bridge
    - establishing measures to encourage use of arterials and discourage through-traffic from using local streets
    - reconfiguring the I-10 ramps on Bundy Drive
- Intelligent transportation systems (ITS)
    - implement traffic signal upgrades as part of the automated Traffic Surveillance and Control (ATSAC) System that provides real-time monitoring and adjustment of signal timing
    - installation of CCTV cameras and associated infrastructure to improve LADOT's ability to monitor and respond to real time traffic conditions
- Transit improvements
    - establishing new running bus rapid transit (BRT) lanes on Sepulveda Boulevard, Lincoln Boulevard and Santa Monica Boulevard
    - enhancing bus service through expanded service routes and frequency as well as bus stop improvements
    - establishing circulator/shuttles to connect activity centers to major transit centers
- Trip reduction programs
    - updating parking requirements and improving parking utilization including through establishment of systems for real-time parking information
    - providing guidance and implementation of travel demand management (TDM) programs
    - developing an online TDM Toolkit with information for transit users, cyclists, and pedestrians
- Bicycle and pedestrian improvements
    - implementing connectivity improvements at major metro stations (i.e., enhancing landscaping, shading, lighting, directional signage, shelters and mid-block crosswalks where feasible)
    - implementing bicycle friendly street design as an alternate route to major corridors
    - installing mobility hubs at or adjacent to Metro Stations and satellite hubs (including secure bike parking and car/bicycle sharing)
    - implementing streetscape plans along segments of Centinela Avenue and Motor Avenue
    - implementing bicycle lanes, cycle tracks, and multi-use tracks
    - complete gaps in the sidewalk network and provide pedestrian enhancements
    - establishing bicycle rental pods and transit centers that offer bicycle parking, rentals, repairs, lockers, showers, and transit information, within existing development or a new development (i.e., within parking garage or transit station)

- Green streets
    - establishing neighborhood greenway on city-owned vacant parcels along future Expo light rail transit (LRT) Westwood Station, including nature walkway, simulated stream to treat urban runoff and educational amenities
    - establish green street on Pico Boulevard between Barrington Avenue and Sawtelle Boulevard with stormwater management (infiltration swales) and aesthetic improvements for specified neighborhoods

While a wide range of transportation improvements are contemplated in the Westside Mobility Plan, including light rail, bus rapid transit and others, such improvements will be analyzed further at the project level through separate environmental impact analyses.

Additional Amendments

Additional administrative text amendments would be made to the CTCSP and WLA TIMP to update and revise the text where appropriate. For example, the list of definitions would be revised to incorporate new terms and update language to be consistent with the updated Mobility Element. Other revisions may include eliminating information that is no longer applicable. Additionally, Section 2(A), Purpose, of the CTCSP and Section 1(A), Purpose, of the WLA TIMP would be revised to incorporate support for multi-modal transportation consistent with the City's General Plan draft Mobility Element.

Project Background

The west side 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, in the past, over reliance on the car as a 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 efficiency of the overall system, and enhance the livability of the major boulevards in Westside communities.

To address the transportation issues on the Westside, the Los Angeles City Council directed the Department of Transportation in conjunction with the Department of City Planning to undertake a comprehensive study to develop potential short-term solutions and long-term plans to address congestion and mobility challenges within this section of the City. The comprehensive study, called the Westside Mobility Plan (WMP), is being undertaken to develop a long range vision that would facilitate a more balanced approach toward improving mobility on the Westside.

The amendments to the CTCSP and WLA TIMP are being developed as a component of the Westside Mobility Plan (WMP). The WMP study area is made up of the combined boundaries of the CTCSP and WLA TIMP areas. The CTCSP and WLA TIMP are intended to serve as the primary implementation tools for bringing to life the vision for future mobility conditions on the Westside as articulated within the Westside Mobility Plan.

The Westside Mobility Plan has six components described briefly below:

1) *Westside Transportation Demand Model* – an innovative transportation demand model that can be used as a tool in the analysis of existing and future transportation system deficiencies and the analysis of potential transportation solutions.

2) *Westside Mobility and Rail Connectivity Study* – evaluation of rail transit options for the Green Line extension, the Lincoln Boulevard and Sepulveda Boulevard corridors, and for other potential connecting corridors.

3) *Westside Parking Study* – documentation of existing parking conditions and deficiencies, an assessment of future parking demand and needs at select parking hot-spot areas, and recommendations for potential solutions including additional parking management and pricing strategies.

4) *CTCSP* – an updated Coastal Transportation Corridor Specific Plan, including updated improvement project list and traffic impact fees.

5) *WLA TIMP*– an updated West Los Angeles Transportation Improvement and Mitigation Specific Plan, including updated project list and traffic impact fees.

6) *Livable Boulevards* - an analysis of existing conditions for selected commercial corridors, public outreach to gather community feedback, market analysis of four priority subareas, an Urban Design and Streetscape Recommendations report, and streetscape plans for the following corridor segments:

   - Centinela Avenue between Short Avenue and Culver Boulevard
   - Motor Avenue between I-10 and Venice Boulevard
   - Pico Boulevard between Sepulveda Boulevard and Patricia Avenue
   - Pico Boulevard between the I-405 and I-10.

CTCSP and WLA TIMP Components of the Westside Mobility Plan

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

The purpose of the traffic impact fees is to establish a funding mechanism for transportation improvements needed to address transportation impacts generated by new development within the specific plan areas, and to require that new development projects mitigate any project-related significant transportation impacts. Developers pay the impact fee to the City prior to the issuance of any building, grading or foundation permit. A one-time fee is charged to new development based on the number of new trips generated by the new development within the specific plan areas. The fee would be assessed on the amount of net new trips resulting from the project. A project's existing trips would be credited toward the new building/development.

The fees are deposited into trust funds for implementing the transportation improvements identified within the specific plans (Appendix B and Appendix C of the CTCSP and Appendix C of the WLA TIMP). Updating the CTCSP and WLA TIMP and the development impact fee program therein, will ensure the continued collection of fees that result in local control of a dependable funding source for leveraging federal and state monies while mitigating impacts and equalizing developer costs, commensurate with surrounding cities that have or are adopting similar fee programs. The fee is increased (or can also be decreased) on January 1 of each year by the amount of the percent change in the most recently available

City Building Cost Index as determined by Los Angeles Department of Transportation (LADOT). The current fee programs (as of January 2014) are shown below in Table 1.

Table 1 Impact Fee Program

Program	Year Established	Current Fee	Exemptions
Coastal Transportation Corridor Specific Plan	1985	$8,267 per PM peak hour trip	Exempt: neighborhood retail; schools/government facilities; residential (excluding hotels); Airport projects not on Airport property specifically not exempt
West Los Angeles Transportation Improvement and Mitigation Specific Plan	1997	$3,345 per PM peak hour trip	Exempt: neighborhood retail; first 30,000 square feet (SF) of other retail; schools/ government facilities; residential (excluding hotels)

The traffic impact assessment programs require new development to mitigate their project specific impacts and to contribute a fair share to complete regional improvements to mitigate the cumulative impacts. The fair share is based on a "nexus" and constitutes approximately 35 percent of the total cost of the identified improvements. The fair share payment (traffic impact fee) is calculated in direct proportion to the number of net new PM peak hour trips generated by new development. 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 traffic 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 traffic 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.

Currently, the traffic impact fees are used towards the capital cost of specific local projects with a regional benefit as identified within each specific plan, including:

- Roadway projects such as arterial widening, intersection improvements
- Signal synchronization, intelligent transportation systems (ITS)
- Bus and rail transit capital, transit stop enhancements
- Bicycle and pedestrian improvements
- Travel Demand Management (TDM) strategies (e.g. rideshare, transit subsidies, flex schedules)

Operation and maintenance costs cannot be funded with developer impact fees.

Many of the transportation improvements that were identified in the existing CTCSP and WLA TIMP Transportation Improvement Programs have been constructed. Table 2 summarizes the projects that have been completed that were identified in the original specific plan documents.

Table 2 Status of Specific Plan Improvement Projects

Transportation Improvements	Coastal Transportation Corridor	West LA
Corridor Improvements Completed or in Progress	• Sepulveda Boulevard (Blvd) Transportation Improvement; Lincoln Blvd to Centinela Avenue (Ave) • Marina Freeway Extension; Culver Blvd to Lincoln Blvd • Arbor Vitae Street Widening; La Cienega Blvd to Airport Blvd • Centinela Avenue Widening; Sepulveda Blvd to National [Playa Vista and City Capital Improvement Program]	• Santa Monica Blvd between Sepulveda Blvd and Century Park East (also known as the Santa Monica Transit Parkway Project) • Sepulveda Blvd between Santa Monica Blvd and Sepulveda Pass • Wilshire Blvd between Glendon and Comstock
Intersections Improvements	Of the 14 intersection improvements listed in CTCSP Appendix B, 13 projects have been completed, implemented primarily through the developer traffic mitigation requirements per CEQA. The remaining intersection improvement at La Tijera Blvd and Airport Ave would be completed as part of the CTCSP La Tijera corridor improvement, if pursued.	Of the 24 intersection improvements listed in WLA TIMP Appendix C, 15 projects have been completed. Of the signalized intersections, all 14 locations have been completed.

Citywide Policy Update - Draft Mobility Plan 2035

The Westside Mobility Plan is just one of several planning efforts currently being undertaken by the City of Los Angeles aimed at improving overall mobility throughout the City. . In February 2014, the City of Los Angeles released the draft Mobility Plan (MP) 2035. MP 2035 is an update of the Transportation Element of the City's General Plan to reflect policies and programs that will lay 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 is being prepared in compliance with the 2008 Complete Streets Act (Assembly Bill 1358), which mandates that the circulation element of the General Plan be modified to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan.

Issues to be Addressed in the EIR

No initial study checklist has been prepared for the proposed project. However, an assessment of each of the CEQA issue areas has been conducted to tentatively determine which topics will be analyzed in detail in the EIR. Based on the assessment presented in Attachment 1, the following topics have been identified for detailed evaluation in the EIR:

- Air Quality
- Biological Resources
- Greenhouse Gases
- Land Use and Planning
- Noise
- Traffic and Transportation

In addition, the EIR will address cumulative impacts, growth-inducing impacts, and other issues required by CEQA.

Submittal of Written Comments

The Lead Agency solicits comments regarding the scope, content and specificity of the EIR from all interested parties requesting notice, responsible agencies, agencies with jurisdiction by law, trustee agencies, and involved agencies. All comments will be considered in the preparation of the Draft EIR. Please send your written/typed comments (including a name, telephone number, and contact information) to the following:

City of Los Angeles, Department of City Planning
Conni Pallini-Tipton, AICP, City Planner
200 N. Spring Street, Rm 667
Los Angeles, CA 90012
(213) 978-1179; (213) 978-1477 (Fax) or,

westside2@fehrandpeers.com

Because of time limits mandated by state law, written comments must be provided to the City of Los Angeles at the earliest possible date, but no later than 5 p.m. on June 23, 2014.

Notice of Scoping Meeting: Pursuant to California Public Resources Code §§21081.7, 21083.9, and 21092.2, the Department of City Planning will conduct two public scoping meetings for the purpose of soliciting oral and written comments from interested parties requesting notice, responsible agencies, agencies with jurisdiction by law, trustee agencies, and involved federal agencies, as to the appropriate scope and content of the EIR.

All interested parties are invited to attend a public scoping meeting to assist in identifying issues to be evaluated in the EIR. The scoping meetings will provide information about the proposed project and the anticipated scope of the analyses to be included in the Draft EIR. The scoping meetings will provide attendees with an opportunity to provide input to the scope of the EIR. The information presented at the two scoping meetings will be identical. Written comments will be accepted at the scoping meetings.

The public scoping meetings will be held at the following times and locations:

Date: Thursday, June 5, 2014
Time: 6:00 PM to 8:00 PM
Location: Westside Pavilion Community Meeting Room B
10800 W. Pico Boulevard
Los Angeles, CA 90064

Date: Monday, June 9, 2014
Time: 6:00 PM to 8:00 PM
Location: Venice High School
13000 Venice Boulevard
Los Angeles, CA 90066

Translation in other languages can be made available at both meetings upon request. Please submit translation requests at least three business days (72 hours) in advance of each scheduled meeting to conni.pallini-tipton@lacity.org.

For additional information, please contact Conni Pallini-Tipton at (213) 978-1179.

Michael J. LoGrande
Director of Planning

Conni Pallini-Tipton, AICP
City Planner, Policy Planning Division

Attachment 1
Discussion of Potential Environmental Impacts

Introduction

The following is an assessment of each CEQA issue area to determine if the proposed project could have potentially significant impacts and if further evaluation in the EIR is warranted. As described in Section 15128 of the CEQA Guidelines, no further environmental review is necessary for the issues that were determined not to be significant. The Initial Study Checklist questions contained in Appendix G of the State CEQA Guidelines was used as a guide in preparation of this analysis.

No direct physical impacts would occur as a result of the proposed amendments to the specific plans, but may occur with implementation of the transportation improvements that would be facilitated in part by the proposed amendments. Thus, the analysis herein focuses on the potential environmental impacts associated with the updated lists of transportation improvements. At this time the transportation improvements represent conceptual-level actions because no detailed designs or implementation plans have been developed. Therefore, the potential for significant impacts to occur is assessed at a regional scale. As individual transportation improvements move forward they would be evaluated at a project level as appropriate.

The EIR will also address the potential for the proposed project to result in changes to land uses due to proposed increases in traffic impact fees and any consequent indirect impacts associated with such land use changes.

2.1 Aesthetics

The study area is comprised of a complex array of land uses within a highly varied visual environment. While a large part of the study area is highly urbanized, with uses that include residential development of varying densities, commercial and industrial development, and public facilities (i.e., LAX, schools, and parks), there are also areas of open space and valued natural features (i.e., wetlands, beaches, coastal bluffs, and ocean). The visual character of the surroundings, as well as availability of scenic views, varies accordingly with the surrounding uses, as does the potential for significant visual impacts. Scenic vistas (in particular, the Santa Monica Mountains, Pacific Ocean, Santa Monica Bay, and Del Rey Lagoon) scenic resources such as trees and historic buildings, and coastal resources such as beaches, coastal bluffs, and wetlands, are located through the study area.

Implementation of many of the proposed transportation improvements would result in physical changes to existing rights-of-way, including the reconfiguration of existing travel and parking lanes, bikeway improvements, and new or upgraded traffic signals. Such projects would entail physical changes such as re-striping of travel lanes or construction of new bicycle paths within an existing right-of-way. These projects would primarily occur at grade and would not be visually prominent, and thus would not have the potential to substantially alter or obstruct existing scenic views, damage scenic resources, degrade the existing visual character or quality of the project area, or create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

The only new structures associated with the proposed transportation improvements include bicycle transit centers and the replacement/widening of Lincoln Bridge. However, bicycle transit centers would likely be established within existing development or future development projects (e.g., within parking garages or transit stations) and would not result in new stand-alone buildings. Therefore, bicycle transit centers would visually blend with the larger development and impacts to aesthetic and scenic resources are expected to be minimal. Further, should bicycle transit centers be established as part of new development, the potential visual impacts would be considered during project-specific approval processes. The Lincoln Bridge replacement and widening would occur in a similar location to the existing bridge and is anticipated to have a similar visual profile as the existing bridge and thus is not expected to substantially alter views or otherwise affect scenic resources in the vicinity. Aesthetic impacts along with any other potentially significant physical impacts associated with the Lincoln Bridge replacement/widening would be further analyzed through a separate, project level environmental review once the project details have been more fully developed.

BRT is a proposed transportation improvement along several major roadways (Lincoln Boulevard, Sepulveda Boulevard, and Santa Monica Boulevard). These roadways are busy and highly urbanized roadways with existing bus service. The establishment of BRT lanes would not substantially alter views or scenic resources, change the visual character of these roadway corridors, or create new sources of substantial light or glare which would adversely affect day or nighttime views in the area.

No LRT projects are currently being considered as part of the proposed transportation improvements, although conversion of BRT to rail may be considered in the long-term future if demand dictates.

As described above, the visual prominence of the proposed transportation improvements would be limited as many projects would involve at-grade modifications to existing rights-of-way such as re-striping to change the lane configuration or new bikeways. Streetscape improvements would be designed to improve the visual quality of an area, and would be designed for consistency with any relevant design guidelines and policies, including those policies and objectives presented in the applicable community plan and specific plans. Should any street trees require removal, this removal and subsequent replacement would be done in accordance with City of Los Angeles policies, including the City of Los Angeles Tree Ordinance and Community or Specific Plan if applicable (i.e., street tree planting requirements). Therefore, no degradation of the visual character or quality of the study area would occur.

Construction activities could result in short-term visual and aesthetic changes, such as those associated with the temporary land disturbance, the placement of sound panels (i.e., noise walls), and presence of heavy equipment during construction. This would be short-term and only occur within the immediate area of construction, and therefore would not result in a significant visual impact.

Roadways that provide scenic views within the State of California are classified by Caltrans as officially designated scenic highways. There are no state designated scenic highways within the study area. A segment of the Pacific Coast Highway from Venice Boulevard to State Route 101 is identified as an Eligible State Scenic Highway. The portion of this segment from Venice Boulevard to the City of Santa Monica boundary (approximately 1.15 miles) is within the study area. The proposed projects that could occur along this segment include center running BRT, enhancing pedestrian access to major BRT/LRT transit stations (including enhanced sidewalk amenities such as landscaping, shading, lighting, directional signage, shelters, curb extensions and/or mid-block crosswalks where feasible),

establishment of mobility hubs at or adjacent to transit stations and satellite hubs around the stations (including secure bike parking and car/bike sharing), implementation of citywide bicycle plan, and other improvements such as signal upgrades and CCTV cameras. These improvements would be consistent with the urban context of this portion of the Pacific Coast Highway and would not substantially alter views.

There are two Scenic Corridor Plans within the WLA TIMP, the San Vicente Scenic Corridor and the Wilshire Westwood Scenic Corridor. Additionally, there are roadways designated in community plans as scenic corridors within the study area, including Wilshire Boulevard, Santa Monica Boulevard, and Avenue of the Stars. Protective land use controls are applicable to the scenic corridors, in particular controls on signage and billboards. As discussed above, the transportation improvements (such as lane re-striping, bike pathway connections, and traffic signal upgrades) would be located within the rights-of-way and would not include features that would substantially alter the visual character of the scenic corridors. Streetscape plan improvements would be designed to improve the visual quality of an area, including scenic corridors, and would be designed for consistency with relevant design guidelines and policies, including those policies and objectives presented in the applicable community plan and specific plans. Therefore, no significant impacts to scenic corridors would occur.

It is anticipated that construction would occur during daylight hours when possible, consistent with the Los Angeles Municipal Code requirements, however, should nighttime construction occur (i.e., to limit the need for road or lane closures during peak travel times), lighting would be temporary and limited to the minimum amount necessary for job site and worker safety. Lights would only be used when necessary and would be shielded and directed toward the construction site to minimize spillover, therefore, the transportation improvements would not create a new source of substantial light and glare. Some replacement of existing street lighting or new lighting, such as pedestrian or security lighting along roadways and bikeways, could occur; however, the study area is a highly urbanized environment with many existing sources of lights, including street lighting, and new lighting added or replaced would not substantially increase ambient light levels. Further, new lighting would comply with lighting requirements, including the use of directional lighting and shields to minimize off-site glare. Therefore, the proposed project would not create a new source of substantial light and glare.

As discussed above, no significant impacts on scenic views or vistas, scenic resources, or the visual character of the project area would occur, and the proposed project would not create a new source of substantial light or glare which would adversely affect views in the area. Therefore, aesthetics impacts would less than significant and will not be evaluated further in the EIR.

2.2 Agricultural and Forestry Resources

The study area is in an urbanized area within the City of Los Angeles and does not include agricultural or forestry-related uses, or agricultural or forestry-related land use designations. The California Department of Conservation's Farmland Mapping and Monitoring Project identify the area as "Urban and Built-up Land". No agricultural or forestry related activities occur with the study area or vicinity. As such, the proposed project would not conflict with existing zoning for agricultural, forest land, timberland use, or a Williamson Act contract, nor would it involve any changes to the environment that could result in the conversion of farmland or forest land. Therefore, there would be no impacts to agricultural or forestry resources and this topic will not be evaluated further in the EIR.

2.3 Air Quality

The proposed project is located in the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is the regional agency responsible for air quality regulations within the SCAB including enforcing the California Ambient Air Quality Standards (CAAQS) and implementing strategies to improve air quality and to mitigate effects from new growth. The SCAQMD, in association with the California Air Resources Board (CARB) and the Southern California Association of Governments (SCAG), is responsible for preparing the Air Quality Management Plan (AQMP) that details how the region intends to attain or maintain the state and federal ambient air quality standards.

The California Clean Air Act, signed into law in 1988, established the CAAQS; all areas of the state are required to achieve and maintain the CAAQS by the earliest practicable date. Regions of the state that have not met one or more of the CAAQS are known as nonattainment areas, while regions that meet the CAAQS are known as attainment areas. The project area is located in the Los Angeles County sub-area of the SCAB. Los Angeles County is designated as a state nonattainment area for O_3, fine particulate matter less than or equal to 2.5 μm in diameter (PM2.5), inhalable particulate matter less than or equal to 10 μm in diameter (PM10), nitrogen dioxide (NO_2), and lead; and an attainment or unclassified area for carbon monoxide (CO), sulfur dioxide (SO_2), sulfates, hydrogen sulfide, and visibility reducing particles.[2]

The proposed transportation improvements would generate short-term regional and localized emissions from construction activity. This could result in a temporary increase in local pollutant concentrations and could temporarily increase the frequency of violations of air quality standards. Construction activities that occur in one location for an extended period of time, construction of multiple transportation improvements in the same area at the same time, or construction of project-related improvements in conjunction with other cumulative development in the area could exceed thresholds of significance and may expose sensitive receptors to significant construction-related emissions. As such, impacts to sensitive receptors from construction related air emissions could be potentially significant.

The proposed project includes conceptual transportation improvements designed to reduce traffic impacts associated with future development and improve multi-modal mobility. As such, it is anticipated that future vehicle emissions would be reduced under the proposed project, and thus, no significant operational air quality impacts would result; however this issue will be further evaluated in the EIR. Additionally, the proposed project will be reviewed for consistency with the Air Quality Management Plan in the EIR.

Potential sources that may emit odors during construction activities include equipment exhaust. Odors from these sources would be localized and generally confined to the immediate area of construction activities. The transportation improvements would utilize typical construction techniques and equipment, and would not have odors other than those that occur typically during construction activities. Operational odors would be associated with vehicle operations (i.e., exhaust) and would be the same as currently occurs along roadways, which is not typically associated with odor complaints. The SCAQMD CEQA Air Quality Handbook identifies example land uses and industrial operations associated with odor complaints as being agricultural uses, wastewater treatment plants, food

[2] California Air Resources Board, Area Designations Maps/State and National Homepage, Available: http://www.arb.ca.gov/desig/adm/adm.htm.

processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding.[3] The proposed project would not include such uses. Therefore, impacts associated with odors would be less than significant and will not be evaluated further in the EIR.

2.4 Biological Resources

The proposed transportation improvements would occur primarily within existing rights-of-way in urbanized areas that have limited, if any, biological resources. However, some transportation improvements would take place near the Ballona Creek wetlands, which could potentially affect sensitive or special status species, and sensitive habitats, including riparian habitat and federally protected wetlands. There is also the potential that wildlife corridors or nursery sites could be affected, including nesting birds in trees near or within construction areas. Therefore, potential impacts on biological resources will be evaluated further in the EIR.

Any potential tree removal/replacement would occur in accordance with the Los Angeles Municipal Code, including the tree ordinance, and the recommendations of the Department of Public Works Street Tree Division. Therefore, no conflict with local policies or ordinances protecting biological resources would occur and this issue will not be evaluated further in the EIR.

There are no County Habitat Conservation Plans (HCP) or Natural Community Conservation Plans (NCCP) within the study area. The County of Los Angeles has identified two Significant Ecological Areas (SEAs), the Ballona Wetlands and El Segundo Dunes, within the study area. These SEAs are designated as Coastal Resources Areas (CRAs) in the County's 2014 Draft General Plan.[4] CRAs have equivalent ecological significance as Significant Ecological Areas (SEAs), but, due to their location within the California Coastal Zone, are subject to the California Coastal Act as opposed to the County's SEA Ordinance.[5] The Los Angeles Airport/El Segundo Dunes has also been designated as an ecologically significant habitat area (ESHA) pursuant to Section 30240 of the California Coastal Act. The El Segundo Blue Butterfly Habitat Restoration Area, located within the Los Angeles Airport/El Segundo Dunes, was designated by City of Los Angeles Ordinance 167,940 and is governed by the Los Angeles/El Segundo Dunes Habitat Restoration Plan.[6] There are no transportation improvements proposed within or near the Los Angeles Airport/El Segundo Dunes. The only study area roadway within an SEA/CRA is an approximately 0.25 mile portion of the Lincoln Boulevard from Culver Boulevard to Fiji Way, located within the Ballona SEA/CRA. The Lincoln Bridge is adjacent to but not within the boundaries of the SEA/CRA. Transportation improvements occurring within this area would be located within the existing right-of-way and would be reviewed for consistency with applicable local plans and as such would not conflict with the SEA/CRA. Therefore, the potential for conflict with the provisions of a habitat conservation plan will not be further evaluated in the EIR. Any potentially significant physical impacts

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3 South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993 and on-line updates.

4 Los Angeles County Department of Regional Planning, Los Angeles County General Plan 2035: Public Review Draft, January 2014, Available: http://planning.lacounty.gov/assets/upl/project/gp_2035_entire-draft2014.pdf, accessed March 13, 2014.

5 Los Angeles County Department of Regional Planning, SEA Program: Significant Ecological Area – Proposed SEAs, Available: http://planning.lacounty.gov/sea/proposed, accessed on March 13, 2013.

6 City of Los Angeles, Draft Environmental Impact Report Los Angeles International Airport (LAX) Specific Plan Amendment Study, Section 4.3, July 2012.

associated with the Lincoln Bridge replacement/widening would be further analyzed through a separate, project level environmental review once project details have been more fully developed.

2.5 Cultural Resources

The proposed transportation improvements would occur within existing rights-of-ways in primarily urbanized areas. Therefore, the likelihood of finding intact archaeological or paleontological resources is very low. In the unlikely event that native soils are disturbed during construction activities and archaeological or paleontological materials are encountered, the uniform practices established by the Southern California Chapter of the American Public Works Association, such as the Standard Specifications for Public Works Construction, would be followed. This includes the suspension of work, in whole or in part, should resources be uncovered until it is determined appropriate to resume. Therefore, impacts to archaeological or paleontological resources would be less than significant and will not be evaluated further in the EIR.

Similarly, given the previously disturbed nature of the study area and the minimal grading that would occur, the potential for encountering human remains is considered very low. Should human remains be encountered during construction, per standard public works construction practice, work would be temporarily diverted from the vicinity of the find until the coroner is notified in accordance with the Health and Safety Code Section 7050.5. If the remains were determined to be of Native American descent, the coroner would have 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC would identify the person(s) thought to be the Most Likely Descendent, who would then help determine the appropriate course of action. Therefore, impacts to human remains would be less than significant and will not be evaluated further in the EIR.

There are a number of historical resources located within the study area, including designated Historic-Cultural Monuments, and Historic Protection Overlay Zones. Several sites (Venice of America House, Venice Canal System, and LAX Hangar One) within the CTCSP and one site (the Chateau Colline) within the WLA TIMP are listed on the National Register of Historic Places. Work associated with the proposed transportation improvements would occur within and immediately adjacent to existing rights-of-way and are not expected to affect these or any other eligible historic resource. Further, as discussed in Section 2.1 Aesthetics, no significant visual impacts would occur that could indirectly cause a substantial adverse change to historic resources. Therefore, no adverse change in the significance of a historic resource would occur and impacts would be less than significant. Impacts to historic resources will not be evaluated further in the EIR.

2.6 Geology and Soils

The study area, like most of Southern California, is located in a region of high seismic activity and is therefore subject to risks and hazards associated with earthquakes. There are several active faults within the Los Angeles region. The proposed transportation improvements are not located within the boundaries of a state-designated Alquist-Priolo Earthquake Fault Zone. However, the study area includes some areas within Fault Rupture Study Areas as identified in the City of Los Angeles General

Plan Safety Element.[7] The proposed transportation improvements would be constructed to meet all applicable California Building Standards Code and seismic safety standards, including earthquake-resistant standards for earthwork. Additionally, design and construction/modification of any structures (e.g., bridge replacement or bicycle transit centers) would similarly adhere to applicable codes including the California Building Code seismic standards and the grading code. The construction and operation of the proposed transportation improvements would not increase risks associated with earthquake activity or fault rupture. Therefore, the proposed project would not expose people or structures to potential significant adverse effects from the rupture of a known earthquake fault and the impact would be less than significant.

Seismic activity could result in ground shaking within the study area. Seismic hazards from ground shaking are typical for many areas of California. The study area would not have a greater potential for seismic activity than most of the state. Furthermore, as noted above, the proposed transportation improvements would be constructed to meet all applicable California Building Standards Code and seismic safety standards, including earthquake-resistant standards. Therefore, the proposed project would not increase the risk of exposure of people or structures to substantial adverse effects from strong seismic ground shaking and the impact would be less than significant.

Depending on the levels of ground shaking, groundwater conditions, the relative density of soils, and the age of the geologic units in the area, the potential for liquefaction varies throughout the City. Seismic-related ground failure, including liquefaction, occurs when saturated, granular deposits of low relative density are subject to extreme shaking and, as a result, lose strength or stiffness due to increased pore water pressure. The consequences of liquefaction are typically characterized by settlement or uplift of structures, and an increase in lateral pressure on buried structures. Although some of the proposed transportation improvements would be located within areas with liquefaction potential, the improvements would be constructed in compliance with all applicable standards, including all applicable California Building Standards Code and seismic safety standards. Site-specific geotechnical investigations would be performed for individual transportation improvements involving major earthwork in order to characterize the subsurface conditions and determine the appropriate site-specific and project-specific considerations. As such, seismic-related ground failure impacts that could expose people or structures to risk of substantial adverse effects (e.g., from liquefaction) would be less than significant.

A majority of the construction and operation of the proposed transportation improvements would occur in or adjacent to public rights-of-way in urbanized areas. During construction, short-term erosion impacts could occur as a result of grading/excavation from construction activities; however, construction contractors would be required to develop and implement a plan to control erosion of soil from the site during construction. With implementation of erosion control plans, substantial soil erosion impacts or loss of topsoil are not anticipated. Additionally, if the construction of a proposed transportation improvement is near drainage/flood control facilities, the erosion control plan would minimize the potential for erosion or siltation on- or off-site to affect the nearby drainage facilities. Consequently, impacts from the construction and operation of the proposed project associated with erosion would be less than significant.

[7] City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, 1996, Available: http://planning.lacity.org/cwd/gnlpln/SaftyElt.pdf, accessed: March 11, 2014.

Much of the study area is characterized by relatively flat topography, however there are some areas identified as being within a landslide hazard zone. Proposed transportation improvements would occur within existing rights-of-way and any construction and earthwork would be conducted in compliance with applicable California Building Standards Code and other seismic safety and engineering standards. Thus, the proposed project would not expose people or structures to potential adverse effects associated with landslides. Further, construction and operation of the proposed transportation improvements are not expected to cause the local geologic units or soils to become unstable, or result in on- or off site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts associated with unstable soil would be less than significant.

Land uses within the study area do not rely on septic tanks or alternative wastewater disposal systems. Construction and operation of the proposed transportation improvements would not affect any existing, or hinder future, septic tanks or alternative wastewater disposal systems, or the soils that would adequately support those systems. Therefore, no impacts related to soil compatibility with septic or other alternative wastewater systems would occur.

Construction and operation of the proposed transportation improvements would not cause the local geologic units or soils to become unstable; result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse; or adversely affect soils capable of supporting the use of septic tanks or alternative wastewater disposal systems; hence, impacts associated with geology and soils would be less than significant this issue will not be further evaluated in the EIR.

2.7 Greenhouse Gas

Greenhouse gases (GHGs) are gases that trap heat in the atmosphere. These emissions occur from natural processes and human activities. Human activities that produce GHGs include the burning of fossil fuels (coal, oil natural gas, gasoline and diesel for heating, electricity and transportation); methane from landfill wastes and raising livestock; deforestation activities; and some agricultural practices. Accumulating scientific evidence indicates a correlation between the worldwide proliferation of GHG emissions by mankind over the past century and increasing global temperatures. [8] The climate change associated with this global warming is predicted to produce negative economic and social consequences across the globe.

The most common GHGs emitted into the atmosphere from natural processes and human activities include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases (hydrofluorocarbons and perfluorocarbons). Each GHG is assigned a global warming potential (GWP), which is the ability of a gas or aerosol to trap heat in the atmosphere. The GWP rating system is standardized to CO_2, which has a value of one. For example, CH_4 has a GWP of 21, which means that it has a global warming effect 21 times greater than CO_2 on an equal-mass basis. Total GHG emissions from a source are often reported as a CO_2 equivalent (CO_2e). The CO_2e is calculated by multiplying the emission of each GHG by its GWP and adding the results together to produce a single, combined emission rate representing all GHGs.

[8] Intergovernmental Panel on Climate Change, Climate Change 2007: Synthesis Report. Contribution of Working Groups I, II and III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change, 2007; U.S. Global Change Research Program, Global Climate Change Impacts in the United States, 2009;

Greenhouse gas emissions would be released from a variety of fossil fuel-powered sources associated with the proposed project during construction and operation. Construction activities would be short term and cease to emit greenhouse gases upon completion. Operational emissions associated with the proposed transportation improvements would primarily include GHG emissions from mobile sources (transportation). These construction and operational sources would have the potential to generate a substantial amount of GHGs and result in a significant impact on the environment. Therefore, potentially significant impacts related to greenhouse gas emissions will be evaluated further in the EIR.

Assembly Bill (AB) 32, signed by Governor Arnold Schwarzenegger in 2006, directs the State of California to reduce statewide GHG emissions to 1990 levels by the year 2020. In accordance with AB 32, CARB developed the Climate Change Scoping Plan (Scoping Plan), which outlines how the state will achieve the necessary GHG emission reductions to achieve this goal. CARB recently published the proposed first update to the Scoping Plan.[9] The Scoping Plan included recommended actions that would reduce GHG emissions with the use of direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system. Consistency with the Scoping Plan and other local policies adopted for the purpose of reducing the emissions of greenhouse gases will be evaluated further in the EIR.

2.8 Hazards and Hazardous Materials

Construction of the proposed transportation improvements would involve the excavation and transport of paving materials (e.g., asphalt, concrete, roadbed fill materials) that could possibly be contaminated, but these excavated materials in themselves would not be classified as hazardous materials. All such paving and roadbed materials would be transported and disposed of in accordance with applicable codes and regulations. Such transport and disposal would only occur during construction and would not create a significant hazard to workers or the surrounding communities. Additionally, construction activities would involve the use of equipment that contains oil, gas, or hydraulic fluids. However, quantities would be small and all hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with federal Occupational Safety and Health Administration (OSHA) and California OSHA standards and other applicable regulations. Implementation of construction and demolition standards, including best management practices (BMPs), would minimize the potential for an accidental release of hazardous materials during construction activities. Therefore, the construction and operation of the proposed transportation improvements would not create a significant impact related to the routine transport, use, or disposal of hazardous materials. Operation of the proposed improvements would not result in emissions or release of hazardous materials beyond the level associated with existing conditions. Therefore, the proposed project would not substantially increase the likelihood and severity of consequences to people or property as a result of the use, transport, storage, or an accidental release of hazardous materials into the environment.

[9] California Air Resources Board, Climate Change Scoping Plan: A Framework for Change, December 2008, Available: http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf, accessed March 14, 2014; California Air Resources Board, Proposed First Update to the Climate Change Scoping Plan: Building on the Framework, February 2014, Available: http://www.arb.ca.gov/cc/scopingplan/2013_update/draft_proposed_first_update.pdf, accessed March 14, 2014.

Some of the transportation improvements would be located within a methane zone.[10] Any new paved areas or structures (e.g., bicycle transit centers) within the methane zone would be required to comply with the Los Angeles Methane Ordinance and the Methane Mitigation Standards established by the Superintendent of Building. Therefore, impacts associated with methane would be less than significant.

The proposed transportation improvements would be constructed and operated within public rights-of-way which are not expected to be sites located on lists of hazardous materials sites (compiled pursuant to Government Code Section 65962.5). If, during construction of the proposed transportation improvements, contamination is discovered with the potential to create a significant hazard to the public or the environment, the applicable regulatory agency would be contacted and the appropriate corrective actions undertaken to eliminate the hazard. Therefore, impacts associated with hazardous materials sites would be less than significant.

Although existing public and private schools are located within one-quarter mile of the proposed transportation improvements, construction and operation is not anticipated to have an adverse effect on these facilities related to hazardous materials, since construction activities and long-term operations would not involve hazardous emissions or substantial amounts of hazardous materials (as discussed above). Further, construction would occur in compliance with applicable regulations regarding use, storage, handling, and transport of hazardous materials. Therefore, impacts would be less than significant.

For proposed transportation improvements located within two miles of a public, public use, or private airport, the potential exists to expose people residing or working in the project site to a safety hazard. LAX is located within the CTCSP, the Santa Monica Airport is located adjacent to the WLA TIMP area and approximately 200 feet from the CTCSP area, and Hawthorne Municipal Airport is located approximately 1.5 southeast of the eastern boundary of the CTCSP. There are also numerous helipads located within and near the study area. The proposed project involves implementation of transportation improvements. No residential development, or other land uses where persons may congregate, are proposed; therefore, the project would not result in a safety hazard to people residing or working in the project area.

There could be temporary interference with local emergency response during construction of the proposed transportation improvements, when roadway access may be limited in the construction zone (e.g., lane or roadway closures). Any on-street construction activities would conform to all traffic work plan and access standards, and would include coordination with applicable public services, to ensure that adequate emergency access is available. Any modifications to existing rights-of-way (e.g., changes in lane configuration) would conform to City standards, including lane width and turning radius, and would not cause interference with local emergency response. Therefore, no significant impacts to emergency response would occur.

A small portion of the study area, south of Marina Del Rey, is within a Very High Fire Hazard Severity Zone within a Local Responsibility Area (LRA) as designated on the California Fire Hazard Severity Zone

[10] City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, Exhibit D, 1996, Available: http://planning.lacity.org/cwd/gnlpln/SaftyElt.pdf, accessed: March 11, 2014.

map.[11] Since the proposed transportation improvements would be located within existing right-of-ways, the proposed project would not increase the amount of area nor the number of structures that may be subjected to wildfire. Construction and operation of the transportation improvements would not increase exposure to wildland fire risks or expose any people or structures to a significant risk of loss, injury or death involving wildland fires and thus no significant impacts would occur.

As discussed above, no significant impacts associated with hazards and hazardous materials would occur and this issue will not be further evaluated in the EIR.

2.9 Hydrology and Water Quality

Construction and operation of the proposed project would be required to comply with all City of Los Angeles ordinances and standard practices to assure proper grading and proper stormwater drainage. The proposed transportation improvements would also comply with all applicable local, state, and federal regulations, including the National Pollution Discharge Elimination System (NPDES) General Construction Permit for construction encompassing greater than one acre, which would require preparation of Stormwater Pollution Prevention Plans (SWPPP). SWPPPs would require stormwater BMPs to limit and manage runoff into the stormwater drainage facilities or receiving waters. Certain projects may also 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. With implementation of the applicable permit and SWPPP requirements, the discharge of potential pollutants from stormwater runoff would be reduced or eliminated to the maximum extent practicable. Therefore, impacts on water quality standards or waste discharge requirements would be less than significant.

The proposed transportation improvements would primarily occur within developed areas with existing hardscape (e.g., streets and sidewalks) and would not substantially increase impervious surface area or affect groundwater. Therefore, implementation of the proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level and impacts would be less than significant.

During operations, surface runoff would be directed into existing storm drains. The proposed transportation improvements could minimally increase overall impervious surface; however, runoff is not expected to substantially increase or be released in substantial quantities or exceed the existing or planned capacity of the local stormwater drainage system. Consequently, impacts to stormwater systems from increased runoff volumes or polluted runoff due to construction and operation of the project would be less than significant.

The proposed Lincoln Bridge replacement and widening project would occur in a similar location to the existing bridge and would not result in an alteration in the course of Ballona Creek. No other proposed transportation projects would alter any other natural stream or river within the study area.

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[11] California Department of Forestry and Fire Protection (CAL FIRE), Los Angeles County: Very High Fire Hazard Severity Zones in Local Responsibility Area, Recommended May, 2012, Available: http://www.fire.ca.gov/fire_prevention/fhsz_maps_losangeles.php, accessed March 6, 2014.

Portions of the study area are within a 100-year flood area. The proposed project would involve transportation improvements and would not result in new residential development or otherwise expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. Therefore, flooding impacts would be less than significant.

Likewise, portions of the CTCSP area are located within the tsunami hazard area, however, the proposed project would result in transportation improvements and would not expose people or structures to a significant risk of loss, injury or death associated with inundation by seiche, tsunami, or mudflow.

As described above, the proposed project would not result in potentially significant impacts associated with hydrology and water quality. Therefore, this issue will not be further evaluated in the EIR.

2.10 Land Use and Planning

The study area is primarily highly urbanized with a variety of land uses, including residential, industrial, office, public facilities, and commercial uses. Transportation improvements would occur within existing rights-of-way and thus conflicts with existing land uses are not anticipated. Nevertheless, the potential for impacts related to land use will be further evaluated in the EIR.

The study area also encompasses open space and parks, including the Ballona wetlands and the Los Angeles Airport/El Segundo Dunes. There are numerous land use plans, policies, and regulations that are applicable within the study area (i.e., General Plan, community plans, specific plans, and zoning code). Should the proposed specific plan amendments and/or transportation improvements conflict with an established land use plan, policy, or regulation, a significant impact could occur. This issue will be evaluated in the EIR.

Potential conflicts with applicable habitat conservation plans are addressed in Section 2.4, Biological Resources, above.

2.11 Mineral Resources

The study area is urbanized and the only mineral extraction that currently occurs is oil drilling in designated areas (Venice Beach Oil Field, Playa del Rey Oil Field, Hyperion Oil Field). The proposed transportation improvements would occur within and along the existing public roadway networks in areas that are not available for mineral extraction. Therefore, proposed project would not eliminate or hinder any existing or future mineral extraction. As such, no impacts to mineral resources are anticipated and the issue will not be evaluated in the EIR.

2.12 Noise

The proposed transportation improvements would occur within public rights-of-ways adjacent to a variety of land uses. This includes urbanized areas with uses such as residential development of varying densities, commercial, industrial, public facilities (i.e., schools and parks), and open space such as the Ballona wetlands. The City of Los Angeles Municipal Code has regulations and policies designed to regulate and reduce noise exposure of sensitive land uses (e.g., residential, schools and hospitals) and regulation of construction noise. Construction of the transportation improvements would temporarily increase noise levels. The potential noise levels will be quantified in the EIR at a program level and will

be evaluated in relation to existing noise levels to determine if a significant impact would occur. Additionally, there is the potential that the existing noise environment would be altered due to a shift in vehicle operations on the roadways. The potential operational change in noise levels will also be evaluated in the EIR.

In addition to potential noise impacts, construction of the proposed transportation improvements could expose persons to, or generate, excessive groundborne vibration or groundborne noise levels or excessive noise levels associated with proximity of an airport. These issues will be evaluated in the EIR.

2.13 Population and Housing

The construction and operation of the proposed transportation improvements would occur primarily within existing rights-of-way and would not involve construction or removal of housing. Therefore, construction and operation of the transportation improvements are not anticipated to have any impacts on the number or availability of existing housing in the area and would not necessitate the construction of replacement housing elsewhere.

The proposed project would not result in the development of residential uses and, therefore, would not induce substantial population growth in an area. While the proposed transportation improvements would improve the existing transportation network, they would not establish new roads or other infrastructure sufficient to indirectly induce substantial population growth, or result in the relocation of substantial numbers of people from outside of the region. Therefore, no significant impact on population and housing would occur and this issue will not be further evaluated in the EIR.

2.14 Public Services

The study area is in urbanized Los Angeles and is served by existing public services, including fire protection, police protection, schools, parks, and other public facilities (i.e., libraries and hospitals). Parks are discussed under Recreation (Section 2.14). The proposed project would not develop residential uses and thus would not directly increase population. While it would improve the existing transportation network, it would not establish new roads or other infrastructure sufficient to induce substantial population growth, or result in the relocation of substantial numbers of people from outside of the region. Therefore, the proposed project would not induce substantial population growth either directly or indirectly and would not increase the demand for public services. Additionally, no new buildings would be constructed. Therefore, there would be no increase in demand for public services, including fire and police protection.

Construction of the proposed transportation improvements could temporarily reduce access for emergency vehicles in the vicinity of construction sites and, if construction is required within public streets, response times could be temporarily affected. However, all construction activities would be coordinated with local fire protection services and carried out in accordance with all applicable local emergency access standards, which would ensure that emergency access would be maintained at all times during construction.

There are numerous public schools in the study area. If an individual transportation improvement is located adjacent to, or in vicinity of a school, construction could potentially limit access either directly (i.e., driveway access) or indirectly (i.e., pedestrian routes). This limit in access would be short-term

(i.e., only when construction is occurring in the vicinity of the school, while in session) and carried out in accordance with all applicable access standards. The proposed project would not result in a population increase that would result in the need for new or expanded schools. Therefore, no substantial adverse physical impacts to local schools would occur from construction activities.

There are other public facilities (e.g., libraries, hospitals) located within the study area. As with other public services, construction of the transportation improvements could result in access impacts during construction, however such impacts would be short-term (i.e., only when construction is occurring in the vicinity) and carried out in accordance with all applicable access standards. The transportation improvements would not result in a population increase that would result in the need for new or expanded public services including libraries or hospitals. No substantial adverse physical impacts to other public facilities would occur.

The proposed project would not cause adverse physical impacts to public services such that construction of new, or the physical alteration of existing, governmental facilities would be required in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services. Impacts on public services are anticipated to be less than significant and will not be evaluated further in the EIR.

2.15 Recreation

As discussed in Section 2.12, Population and Housing, the proposed project would not induce population growth into the area directly or indirectly and therefore no increased demand in recreation facilities would occur.

Construction of transportation improvements that could occur immediately adjacent to public recreation facilities could create temporary disruptions in use of such facilities (i.e., construction noise occurring adjacent to a public park). However, construction would be temporary and limited to the immediate area in which construction activities are occurring. Further, construction would occur in compliance with regulations, including noise controls, and therefore would not substantially change the use patterns of recreational facilities such that substantial physical deterioration of a facility would occur or be accelerated.

Some of the transportation improvements could indirectly increase use of existing parks by improving bicycle and pedestrian accessibility. However this would occur throughout the study area and would not be concentrated on any particular facility such that substantial physical deterioration of facilities would occur. Impacts on recreation are anticipated to be less than significant and will not be evaluated further in the EIR.

2.16 Transportation/Traffic

Although a primary purpose of the proposed project is to facilitate transportation improvements to improve mobility throughout the study area as development increases, the proposed project could result in alterations to current traffic patterns and traffic volumes, which could affect vehicle miles traveled and delay. This will be evaluated in the EIR. The EIR will also evaluate temporary traffic impacts that could occur during construction and will assess whether design features (e.g., sharp curves or dangerous intersections) or incompatible uses would be implemented that could affect safety. While

the proposed project would include specific transportation improvements designed to enhance and encourage alternative transportation, the EIR will evaluate if any conflict with adopted plans and policies supporting alternative transportation would occur.

2.17 Utilities and Service Systems

The proposed project would facilitate proposed transportation improvements and no new or expanded water entitlements or resources would be needed. Likewise, the proposed project would not increase wastewater generation or result in changes to facilities or operations at existing wastewater treatment facilities. The transportation improvements would adhere to all applicable RWQCB requirements and policies. Consequently, no impact or exceedance to wastewater treatment systems permitted by the RWQCB would occur, nor would the proposed project require the construction of new water or wastewater treatment facilities or expansion of existing facilities. Impacts to water supply, wastewater treatment capacity, or related facilities would be less than significant.

Existing stormwater drainage facilities are located throughout the study area. Construction of the proposed transportation improvements could involve limited dewatering, which would be temporary in nature. The quantity of discharge associated with potential dewatering activities would not exceed the capacity of the existing stormwater drainage facilities, nor require new or expanded facilities of this type. Additional impacts associated with stormwater quality are addressed in Section 2.9, Hydrology and Water Quality, above. As noted in that section, during construction, measures would be implemented that would control runoff quality to stormwater drainage facilities. Moreover, operation of the proposed project is not anticipated to substantially alter or increase the amount of stormwater runoff. The transportation improvements would occur primarily within urbanized paved areas, thus the amount of impervious surface area would not substantially increase. As a result, the amount of runoff is not expected to change such that construction or expansion of storm drain facilities would be required.

Utility lines such as gas pipelines and telephone and electric lines are within public rights-of-way. Coordination with utility providers would occur before construction of any of the proposed transportation improvements in order to minimize potential impacts to services and prevent damage to existing lines. In accordance with standard construction practices, any temporary disruption of utility services would be minimized, and customers would be notified prior to the disruption. As a result, impacts to existing utility lines would be less than significant impact.

Construction and demolition debris, such as soil, asphalt, and concrete, would be transported to the nearest inert waste landfill site and disposed of, or recycled, as appropriate. There is adequate inert landfill capacity within the City of Los Angeles[12], and the amount of debris generated during construction would not significantly impact landfill capacities. In addition, construction of the transportation improvements would comply with federal, state, and local statutes and regulations related to solid waste. Operation of the proposed project would not generate solid waste. No significant impacts to landfill capacity would occur. In addition, no impacts related to compliance with solid waste statutes and regulations would occur.

[12] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2012 Annual Report, August 2013.

Energy is provided from numerous sources (located in and outside the State) and supplied via a complex grid and transmission system. Construction of the transportation improvements would require limited amounts of energy. In addition, some of the transportation improvements, such as new lighting, traffic signal upgrades, and CCTV cameras, would require electrical energy to operate. These new features would incorporate the latest energy efficient technology and would represent only a slight increase in energy use throughout the region. In addition, construction and operation of the transportation improvements would occur over many years, which would constitute a gradual incremental increase in demand over time. The amounts of energy required by the proposed project are not anticipated to exceed available supplies or otherwise require the need for the construction of new energy supply facilities. There is a statewide planning effort to improve electrical power supply as well as lower overall electrical power demand. The California Energy Commission is mandated to conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices and use that information to develop energy policies that ensure energy reliability. It can be reasonably assumed that the power supply in Southern California in general, and within the study area specifically, will be adequate, even at times of peak demand, to accommodate project requirements and the incremental increase in energy demands would not result in a significant impact.

As discussed above, no significant impacts on utilities would occur and this issue will not be discussed further in the EIR.

2.18 Mandatory Findings of Significance

As described in herein, the proposed project could potentially result in significant impacts on the quality of the environment with regard to biological resources. These potential impacts will be evaluated in the EIR. The proposed project would not eliminate important examples of the major periods of California history or prehistory and thus will not be evaluated further.

The proposed project, in conjunction with other past, present, and reasonably foreseeable future related projects, has the potential to result in significant cumulative impacts when the independent impacts of the proposed project and the impacts of related projects combine to create impacts greater than those of the proposed project alone. The potential for the proposed project in conjunction with the related projects to result in cumulatively considerable environmental impacts will be evaluated in the EIR.

As described herein, the proposed project could result in environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly. Impacts from the proposed project will be evaluated in the EIR.

Coastal Transp Corridor Specific Plan/W. LA Transp Improvement and Mitigation Specific Plan Amend Project

SCH Number: 2014051070

Document Type: NOP - Notice of Preparation

Project Lead Agency: Los Angeles, City of

Project Description

The proposed project consists of amendments to the Coastal Transportation Corridor Specific Plan (CTCSP) and West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP). The amendments would include an update to the development/traffic impact fee program, including revisions to the fees, trip generation rates, exemptions, and in lieu credits, and an update to the list of transportation improvements and mitigation measures to be funded, in part, by the impact fees collected from new development. Other proposed changes would include administrative amendments and minor revisions consistent with updates to transportation policies and/or integration of current best practices.

Contact Information

Primary Contact:
Connii Pallini-Tipton
City of Los Angeles
213 978 1179
200 N. Spring Street, Room 667
Los Angeles, CA 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)
Latitude/Longitude: 34° 0' 33" / 118° 26' 11" Map
Parcel No:
Township:
Range:
Section:
Base:
Other Location Info:

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

Development Type

Transportation: Other (Various)

Local Action

Specific Plan

Project Issues

Air Quality, Biological Resources, Coastal Zone, Noise, Traffic/Circulation, Landuse

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Reviewing Agencies (Agencies in **Bold Type** submitted comment letters to the State Clearinghouse)

Resources Agency; California Coastal Commission; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; **Native American Heritage Commission**; Public Utilities Commission; Santa Monica Bay Restoration; Caltrans, Division of Aeronautics; California Highway Patrol; Department of Housing and Community Development; Caltrans, District 7; Air Resources Board; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 4

Date Received: 5/22/2014 **Start of Review:** 5/22/2014 **End of Review:** 6/20/2014

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NATIVE AMERICAN HERITAGE COMMISSION
1550 Harbor Boulevard, Suite 100
West Sacramento, CA 95691
(916) 373-3715
Fax (916) 373-5471
Web Site www.nahc.ca.gov
Ds_nahc@pacbell.net
e-mail: ds_nahc@pacbell.net

May 30, 2014

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

Sent by U.S. Mail
No. of Pages: 4

RE: SCH#2014051070; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the **"Coastal Transportation Specific Plan / West Los Angeles Transportation Improvement and Mitigation Specific Plan Amendment Project;"** located in the West Los Angeles Area; Los Angeles County, California

Dear Ms. Pallini-Tipton

The Native American Heritage Commission (NAHC) has reviewed the above-referenced environmental document.

This project may also be subject to California Government Code Sections 65040.2 *et seq. (SB 18).*

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b).. To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f).

If there is federal jurisdiction of this project due to funding or regulatory provisions; then the following may apply: the National Environmental Policy Act (NEPA

42 U.S.C 4321-43351) and Section 106 of the National Historic Preservation Act (16 U.S.C 470 *et seq.*) and 36 CFR Part 800.14(b) require consultation with culturally affiliated Native American tribes to determine if the proposed project may have an adverse impact on cultural resources

We suggest that this (additional archaeological activity) be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. Any information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure pursuant to California Government Code Section 6254.10.

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources.

California Government Code Section 65040.12(e) defines "environmental justice" to provide "fair treatment of People...with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies." (The California Code is consistent with the Federal Executive Order 12898 regarding 'environmental justice.' Also, applicable to state agencies is Executive Order B-10-11 requires consultation with Native American tribes their elected officials and other representatives of tribal governments to provide meaningful input into the development of legislation, regulations, rules, and policies on matters that may affect tribal communities.

Lead agencies should consider first, avoidance for sacred and/or historical sites, pursuant to CEQA Guidelines 15370(a). Then if the project goes ahead then, lead agencies include in their mitigation and monitoring plan provisions for the analysis and disposition of recovered artifacts, pursuant to California Public Resources Code Section 21083.2 in consultation with culturally affiliated Native Americans.

Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Dave Singleton
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

Native American Contacts
Los Angeles County California
May 30, 2014

LA City/County Native American Indian Comm
Ron Andrade, Director
3175 West 6th St, Rm. 403
Los Angeles , CA 90020
randrade@css.lacounty.gov
(213) 351-5324
(213) 386-3995 FAX

Gabrielino /Tongva Nation
Sandonne Goad, Chairperson
P.O. Box 86908 Gabrielino Tongva
Los Angeles , CA 90086
sgoad@gabrielino-tongva.com
951-845-0443

Owl Clan
Qun-tan Shup
48825 Sapaque Road Chumash
Bradley , CA 93426
mupaka@gmail.com
(805) 472-9536 phone/fax
(805) 835-2382 - CELL

Gabrielino Tongva Indians of California Tribal Council
Robert F. Dorame, Tribal Chair/Cultural Resources
P.O. Box 490 Gabrielino Tongva
Bellflower , CA 90707
gtongva@verizon.net
562-761-6417 - voice
562-761-6417- fax

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.
Private Address Gabrielino Tongva
,
tattnlaw@gmail.com
310-570-6567

Gabrielino-Tongva Tribe
Bernie Acuna, Co-Chairperson
P.O. Box 180 Gabrielino
Bonsall , CA 92003
(619) 294-6660-work
(310) 428-5690 - cell
(760) 636-0854- FAX
bacuna1@gabrielinotribe.org

Gabrieleno/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693 Gabrielino Tongva
San Gabriel , CA 91778
GTTribalcouncil@aol.com
(626) 286-1232 - FAX
(626) 286-1758 - Home
(626) 286-1262 -FAX

Gabrielino-Tongva Tribe
Linda Candelaria, Co-Chairperson
P.O. Box 180 Gabrielino
Bonsall , CA 92003
palmsprings9@yahoo.com
626-676-1184- cell
(760) 636-0854 - FAX

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

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list s only applicable for contacting locative Americans with regard to cultural resources for the proposed SCH#2014051070; CEQA Notice of preparation (NOP) draft Environmental Impact Report (DEIR) for the Coastal Transportation Specific Plan/West Los Angeles transportation Improvement Project, et al; located in the City of Los Angeles; Los Angeles County, California.

Native American Contacts
Los Angeles County California
May 30, 2014

Gabrieleno Band of Mission Indians
Andrew Salas, Chairperson
P.O. Box 393 Gabrielino
Covina , CA 91723
gabrielenoindians@yahoo.
(626) 926-4131

Gabrielino-Tongva Tribe
Conrad Acuna,
P.O. Box 180 Gabrielino
Bonsall , CA 92003

760-636-0854 - FAX

Gabrielino /Tongva Nation
Sam Dunlap, Cultural Resorces Director
P.O. Box 86908 Gabrielino Tongva
Los Angeles , CA 90086
samdunlap@earthlink.net
909-262-9351

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

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list s only applicable for contacting locative Americans with regard to cultural resources for the proposed SCH#2014051070; CEQA Notice of preparation (NOP) draft Environmental Impact Report (DEIR) for the Coastal Transportation Specific Plan/West Los Angeles transportation Improvement Project, et al; located in the City of Los Angeles; Los Angeles County, California.

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

June 3, 2014

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

Notice of Preparation of a CEQA Document for the
Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan

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

Air Quality Analysis

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

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

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: http://www.aqmd.gov/ceqa/handbook/signthres.pdf. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional

significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/ceqa/handbook/LST/LST.html.

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

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

Mitigation Measures

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

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages at: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf.
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: http://www.aqmd.gov/prdas/aqguide/aqguide.html.

Data Sources

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

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at imacmillan@aqmd.gov or call me at (909) 396-3244.

Sincerely,

Edward Eckerle

Ed Eckerle
Program Supervisor
Planning, Rule Development & Area Sources

LAC140529-19
Control Number

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, OFFICE OF TRANSPORTATION PLANNING
IGR/CEQA BRANCH
100 MAIN STREET, MS # 16
LOS ANGELES, CA 90012-3606
PHONE: (213) 897-9140
FAX: (213) 897-1337

Flex your power!
Be energy efficient!

June 11, 2014

Ms. Conni Pallini-Tipton
City of Los Angeles,
Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, CA, 90066

Re: **Coastal Transportation Corridor Specific Plan**
West Los Angeles Transportation Improvement and Mitigation Specific Plan (CTCSP/WLA TIMP)
Notice of Preparation of Draft EIR
SCH#2014051070 , IGR#140537/EA, Vic: LA/10/4.61

Dear Ms. Pallini-Tipton

The California Department of Transportation (Caltrans) received a notice of preparation of a the Draft Environmental Impact Report (DEIR) that will be prepared for construction activity planned within Coastal Transportation Corridor Specific Plan and the West Los Angeles TIMP area. The proposed project consists of amendments to the Westside of Los Angeles – Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan areas. Amendments include an update to the development traffic impact fee program, and an update to the list of transportation improvements and mitigation measures to be funded.

Based on the information contained in the notice of preparation and initial study, Caltrans has the following comments:

Caltrans concurs with the traffic impact fee approach to mitigate transportation impacts from development. Traffic impacts fees provide a way for the development industry to contribute towards regional transportation improvements that are not feasible for individual developments to fund. In addition, these fees may be used as matching funds to attract public funds from County, State, and Federal programs.

These plans proposed improvements to state highway facilities, mainly Lincoln Boulevard (State Route 1), Santa Monica Boulevard (State Route 2), Venice Boulevard (State Route 187) Interstate 10 and Interstate 405. Different traffic studies for development projects within the study areas have indicated that I-10 ramps to and from Bundy Drive are in need of improvements. We are encouraged that improvements to these ramps are planned. Caltrans recommends Improvements to I-10 ramps to and from Cloverfield Boulevard are also considered.

All modifications to state highway facilities will need an encroachment permit from Caltrans, please include Caltrans early in the planning process. Caltrans wishes to participate in the process to update these plans, please include me and Elmer Alvarez of my staff in the contact list.

Caltrans is continually improving its standards and processes to provide flexibility while maintaining the safety and integrity of the state's transportation system. Caltrans has updated the Highway Design Manual (HDM) to incorporate complete streets policies. Caltrans new mission statement is "*Caltrans provides a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability.*"

Caltrans on April 11, 2014 endorsed the National Association of City Transportation Officials' (NACTO) Urban Bikeway Design Guide that includes innovations such as buffered bike lanes and improved pedestrian walkways.

We note a traffic impact analysis will be prepared, to evaluate whether proposed improvements will affect vehicle miles traveled and delay. Please be aware that Caltrans follows Highway Capacity methods to analyze its facilities. Please refer traffic engineers to follow the *Caltrans Guide for the Preparation of Traffic Impacts Studies*, it is accessible online at: http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

In view of SB 743, the Governor's Office of Planning and Research (OPR) is working on developing alternative ways to LOS for evaluating transportation impacts pursuant to CEQA. Once OPR provides new guidance, Caltrans hopes to collaborate with the City to adopt methods of traffic analysis and new thresholds that are mutually acceptable. In the meantime, Caltrans requests that the City direct consulting traffic engineers to consult with it to determine the appropriate thresholds of significance and analysis methodologies.

Although the lead agency is required to comply with Los Angeles County Congestion Management Program (CMP) standards and thresholds of significance, Caltrans does not consider the Los Angeles County's CMP criteria alone to be adequate for the analysis of transportation impacts pursuant to a CEQA review. The CMP does not adequately address cumulative transportation impacts and does not analyze for safety, weaving problems, or delay. Caltrans' Guide directs preparers of traffic impact analysis to consult with the local District as early as possible to determine the appropriate requirements and criteria of significance to be used in the traffic impact analysis.

Caltrans would like to be included in the process to update these plans. Please include Elmer Alvarez, of my staff, and me to the contact list. If you have any questions regarding these comments, please contact me at (213) 897-9140 or project coordinator Elmer Alvarez at (213) 897-6696 or electronically at elmer.alvarez@dot.ca.gov.

Sincerely,

DIANNA WATSON
IGR/CEQA Program Manager
Caltrans, District 7

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

June 19, 2013

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

RE: Notice of Preparation of a Draft Environmental Impact Report – Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan

Dear Ms. Pallini-Tipton:

Thank you for the opportunity to comment on the proposed Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan (CTCSP/WLA TIM). 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.

LACMTA has been participating in a Technical Advisory Committee (TAC) for this project on an ongoing basis. We appreciate the opportunity to coordinate with City staff, and we look forward to having a role in future coordination activities.

LACMTA must also notify the applicant of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County", Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

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

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

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

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

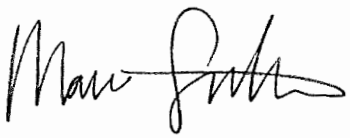
The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria

above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions regarding this response, please contact Marie Sullivan at 213-922-5667 or by email at SullivanMa@metro.net. LACMTA looks forward to reviewing the Draft EIR. Please it to the following address:

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

Sincerely,



Marie Sullivan
Development Review Coordinator, Countywide Planning

Attachment: CMP Appendix D: Guidelines for CMP Transportation Impact Analysis

APPENDIX

D

GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

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

D.1 OBJECTIVE OF GUIDELINES

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

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

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

D.2 GENERAL PROVISIONS

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

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

D.3 PROJECTS SUBJECT TO ANALYSIS

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

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

D.4 STUDY AREA

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

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

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

D.5 BACKGROUND TRAFFIC CONDITIONS

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

D.5.1 Existing Traffic Conditions. Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

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

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

D.6 PROPOSED PROJECT TRAFFIC GENERATION

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

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

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

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

D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

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

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

D.8 IMPACT ANALYSIS

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

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

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

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

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

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

D.8.2 Arterial Segment Analysis. For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

D.8.3 Freeway Segment (Mainline) Analysis. For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

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

- ❑ Evidence that affected transit operators received the Notice of Preparation.
- ❑ A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- ❑ Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both "peak hour" and "daily" refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- ❑ Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
  - ➢ Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
  - ➢ For each time period, multiply the result by one of the following factors:

    3.5% of Total Person Trips Generated for most cases, except:

    10% primarily Residential within 1/4 mile of a CMP transit center
    15% primarily Commercial within 1/4 mile of a CMP transit center
    7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
    9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
    5% primarily Residential within 1/4 mile of a CMP transit corridor
    7% primarily Commercial within 1/4 mile of a CMP transit corridor
    0% if no fixed route transit services operate within one mile of the project

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

- ❑ Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction's TDM Ordinance measures, but other project specific measures.

- Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

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

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

- Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

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

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

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

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

D.10 REFERENCES

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.

FORM GEN. 160 (Rev. 8-12)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: June 16, 2014

TO: Conni Pallini-Tipton, City Planner
Department of City Planning

FROM: Ali Poosti, Division Manager
Wastewater Engineering Services Division
Bureau of Sanitation

SUBJECT: **Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation-Notice of Preparation Draft EIR**

This is in response to your May 22, 2014 letter requesting wastewater service information for the proposed Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation and Mitigation Specific Plan area, including the communities of Brentwood, Century City, Mar Vista, Palms, Playa Del Rey, Playa Vista, Venice, Westchester, Westwood and LAX. The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) has reviewed the request and found the project to be related to amendments that include an update to the development/traffic impact fee program and an update to the list of transportation improvements and mitigation. Other proposed changes include administrative amendments.

Based on the project description, we have determined the project is unrelated to sewers and therefore do not have sufficient detail to offer an analysis at this time. Should the project description change, please continue to send us information so that we may determine if a sewer assessment is required in the future.

If you have any questions, please call Kwasi Berko of my staff at (323) 342-1562.

STORMWATER REQUIREMENTS

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

POST-CONSTRUCTION MITIGATION REQUIREMENTS

The project requires implementation of stormwater mitigation measures. These requirements are based on the Standard Urban Stormwater Mitigation Plan (SUSMP) and the recently adopted Low Impact Development (LID) requirements. The projects that are subject to SUSMP/LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled"*Development Best Management Practices Handbook – Part B: Planning Activities*". Current regulations prioritize infiltration, capture/use, and then biofiltration as

the preferred stormwater control measures. The relevant documents can be found at: www.lastormwater.org. It is advised that input regarding SUSMP requirements be received in the early phases of the project from WPD's plan-checking staff.

GREEN STREETS

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

CONSTRUCTION REQUIREMENTS

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

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

KB\AP:tn

c: Kosta Kaporis, SAN
Daniel Hackney, SAN
Zemamu Gebrewold, SAN

Westchester

Streetscape Improvement Association

Beautify and improve local streetscapes, resulting in a better environment
for both the commercial and residential areas of Westchester

July 22, 2014

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

RE: Notice of Preparation of a Draft EIR, Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan (CTCSP/WLA TIMP) Amendment Project – Los Angeles City File Number AD #NOP-14-003-PL, LADCP Case Numbers ENV-2014-1458-EIR, CPC-2014-1456-SP, and CPC-2014-1457-SP

Dear Ms. Pallini-Tipton:

The Westchester Streetscape Improvement Association (WSIA) is a community volunteer organization which has been working since the 1990's to enhance and improve local streetscapes, resulting in a better environment for both the commercial and residential areas of Westchester. We have projects throughout the Westchester area; however, one project very near and dear to our hearts has been our ongoing effort on Sepulveda Boulevard. Working with the City and the Westchester Town Center Business Improvement District, we have achieved a dramatic revitalization of Sepulveda Boulevard through the Business District, and work is underway within the residential district to replace the long-neglected sidewalks and install new landscaping which will provide a pleasant walking experience for the community.

We have followed the Westside Mobility Plan since its inception several years ago, and understand that the City is considering the extension of light rail service along either a Sepulveda Boulevard or Lincoln Boulevard alignment. WSIA is strongly opposed to a Sepulveda Boulevard alignment and believes that a Lincoln Boulevard alignment makes much more sense for the community. Light rail service along Lincoln Boulevard could serve the Westchester Business District with a new stop to be located within LAWA's LAX Northside Project, and it would serve the higher density population located in the Lincoln/Manchester vicinity, Loyola Marymount University, and Playa Vista. We do not believe that light rail would be compatible with the residential district along Sepulveda Boulevard and are concerned that such an alignment would require the elimination of many of the streetscape projects that WSIA has worked so hard to achieve for the past two decades.

We look forward to reviewing the Draft EIR and encourage the City to eliminate consideration of the proposed Sepulveda Boulevard light rail alignment.

Regards,

John Ruhlen, President

Westchester Streetcape Improvement Association
8726 S. Sepulveda Blvd. Suite D, #1621 - Westchester, CA 90045 - Phone: (310) 225-7630 - Fax: (310) 645-9820
info@WestchesterStreetscape.org - www.WestchesterStreetscape.org - EIN 90-0080493

Los Angeles County Bicycle Coalition
634 S. Spring St. Suite 821
Los Angeles, CA 90014
Phone 213.629.2142
Facsimile 213.629.2259
www.la-bike.org

July 23, 2014

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

Westside Mobility Plan Notice of Preparation
City File Number AD #NOP-14-003-PL, Case # ENV-2014-1458-EIR,
CPC-2014-1456-SP and CPC-2014-1457-SP

Dear Ms. Pallini-Tipton,

The Los Angeles County Bicycle Coalition (LACBC) is a membership-based nonprofit advocacy organization that works to make all communities of Los Angeles County into healthy, safe and fun places to ride a bike. The Westside of Los Angeles has the perfect geography and climate for bicycling: destinations are close, the street grid is mostly intact and the weather is suitable nearly year-round. And yet, bicycling still makes up only a couple percent of all trips despite these natural advantages. LACBC is excited that the Westside Mobility Plan, building on the 2010 Bicycle Plan, offers concrete improvements to make bicycling a safer, more comfortable and more convenient transportation option. We offer these comments on the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan (CTCSP/WLA TIMP) Amendment Project to clarify our priorities and suggest ways in which the EIR can streamline mobility improvements throughout the Westside.

1. Improve North-South Bicycle Facilities Through Westwood and West LA

There are currently several decent bikeways for those traveling east-west, including Santa Monica Boulevard, Venice Boulevard and Ballona Creek, among others. For bicyclists trying to travel north-south, however, there are no good alternatives. This breakdown of the bike network greatly hinders bicycling as an option for the vast majority of people that don't feel comfortable sharing a lane with notoriously aggressive Westside drivers. Major destinations like UCLA are inaccessible for commuters from nearby residential neighborhoods like Palms. There is overwhelming demand for bicycle commuting in this corridor, as demonstrated by an all-day count on Westwood Boulevard south of Santa Monica that counted over 300 bicyclists, despite the lack of bicycle infrastructure. Closing gaps in the network will only multiply the number of people riding bicycles.

LACBC supports the layered network approach of the citywide Mobility Plan 2035 and finds it appropriate to prioritize 8-80 facilities on a subset of the 2010 Bicycle Plan backbone network, while maintaining proposed bikeway designations on the whole network. We support prioritization of the following improvements, in the order of importance:

- Westwood Boulevard Cycletracks, connecting Expo to UCLA Medical Center

- Barrington/McLaughlin Avenue Bicycle-Friendly Street, including cycletracks and traffic calming
- Sepulveda Boulevard Bus-Bike Lanes
- Avenue of the Stars Cycletracks
- Prosser/Westholme Avenue Bicycle-Friendly Street, connecting Expo Bike Path to UCLA

2. Improve Quality of Westside Bike Facilities to Meet 8-80 Design Standards

Traffic safety—real and perceived—is the greatest barrier to bicycling on the Westside. Therefore, the improvements contemplated by the plan must address these concerns with the latest design techniques. In addition to implementing the above priority projects as low-stress bikeways (with the exception of Sepulveda Boulevard), much of the east-west network should be upgraded to modern designs, including:

- Ohio Avenue Bicycle-Friendly Street, west of Westwood Boulevard
- Santa Monica Boulevard Cycletracks, east of Sepulveda Boulevard
- Ohio Avenue/Broadway Gap Closure, connecting Ohio across Santa Monica Boulevard
- Venice Boulevard Cycletracks, coordinated with bus rapid transit project

To ensure the new bicycle facilities perform as intended, the plans should specify minimum standards for bicycle-friendly streets. Currently, NACTO standards recommend that bicycle-friendly streets have traffic volumes below 1,500 vehicles per day and design speeds of 15 miles per hour.

3. Bundle Analysis of Bike Facility Improvements in Programmatic EIR

Bicycle projects are often relatively easy and cost-effective, but subject to the same environmental review process as multimillion-dollar transit and road improvements, with the exception of Class II bike lanes. Since most of the projects proposed in the plans don't qualify for the Class II exemption, this programmatic EIR should seek to environmentally clear as many bike projects as possible, or allow for mitigated negative declarations to be tiered from the programmatic EIR. Specifically, the traffic model should analyze full build-out of the proposed network, including potential traffic diversion on the bicycle-friendly streets. Emergency response times should likewise be analyzed under this scenario.

4. Prioritize Implementation of Active Transportation Improvements

This plan proposes an ambitious suite of multimodal improvements, but these projects are only effective if implemented. Given the poor track record of implementation of bike and bus transit improvements on the Westside, the EIR must carefully analyze implementation scenarios and ensure that those projects that are responsible for reducing VMT are actually delivered. The EIR should not claim any environmental benefit from projects that the City has no intention of actually implementing. A specific implementation measure, such as a set-aside within the TIMP for bicycle and pedestrian projects should be considered to mitigate this potential. All projects also must be analyzed for consistency with the 2010 Bicycle Plan and any inconsistencies mitigated through binding mitigation measures.

The bicycle projects included in each scenario in the interactive dashboards appear to be somewhat arbitrary. To be clear, all projects from the 2010 Bicycle Plan should be carried over to the Westside Mobility Plan, barring those that are physically incompatible with proposed transit projects. Those projects that are not carried over must be mitigated by providing functionally equivalent improvements to serve the same corridor. If you have any questions about how to analyze or prioritize any bicycle improvement scenarios, please reach out.

Thank you for your consideration of these comments. We look forward to working with you to implement a much-needed multimodal transportation system on the Westside. If you have any questions, I can be reached at (213) 629-2142, ext. 127, or eric@la-bike.org.

Sincerely,

Eric Bruins
Planning and Policy Director

Westwood South of Santa Monica Blvd
Homeowner's Association
Incorporated November 8, 1971
P. O. Box 64213
Los Angeles, CA 90064-0213

July 22, 2014

Ms. Connie Pallini-Tipton AICP, City Planner
City of Los Angeles, Dept. of City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012
Via email: conni.pallini-tipton@lacity.org, westside2@fehrandpeers.com

RE: LA City File Number AD # NOP-14-003-PL, LADC Case Numbers ENV-2014-1458-EIR CPC-2014-1456-SP, CPC-2014-1457-SP

Dear Ms. Pallini-Tipton:

We are grateful for the opportunity to comment on the proposed project amendments to the Coastal Transportation Corridor Specific Plan (CTSP) and the West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP). Thank you for extending the comment period to allow for additional time for our consideration of the Notice of Preparation. Members of our Association attended the June 5th public scoping meeting held at the Westside Pavilion Community Meeting Room. Others have viewed the recording of the June 9th Venice High School session.

Before we address the content of the proposed projects, we would like to make some observations related to process—this project's process and the larger LA City process of environmental review as it affects the transportation infrastructure and our mobility.. This project has hosted a number of community meetings where input from the community was taken in an "open house" meeting format. That meeting format precluded us from hearing comments made by our neighbors and other concerned constituents. We do not know what happened to ideas and suggestions that were submitted (many in detail); they were recorded on easels only to have disappeared from view. We do not know how (or if) those suggestions were considered in the distillation of ideas that make up current project recommendations. We are unable to benefit from the shared wisdom of our neighbors in supporting their ideas or of taking their ideas in a new direction to generate potentially better ideas. We do not know if those ideas were ranked by the project staff and, if so, what criteria were used to evaluate them and how were those criteria determined? The fact that our ideas were not publicly viewed or later shared leaves us in a difficult position. We do not know what was considered, if we should be repeating suggestions made earlier, or….? What ideas were evaluated and discarded as unworkable? What ideas might have merit if better described or further refined? (What information might the community have that project staff may be unaware

of?) In short, the project and Planning Dept. is missing an important step in this comment and review process, and we are missing an important set of data in order to make the most informed set of comments in response to the NOP.

While we recognize the need for an updated TIMP list and CTSP, the issuance of this NOP serves to remind us that there is a serious disconnect between the City's land use entitlement review process and the impacts of land use decisions on the transportation infrastructure and our current and future mobility. It would not be inaccurate to describe the City of Los Angeles as a large dog that is preoccupied with chasing its tail day in and day out. We view the City as an entity seemingly dedicated to approving land use entitlement requests without regard for the traffic and congestion that they may generate. We have been reading project EIR documents long enough to know that traffic studies conducted by traffic engineers hired by project developers often fail to honestly evaluate project traffic impacts. All too often, the City, fails to do its due diligence to provide oversight to the traffic studies. (We advocate for the hiring of EIR project consultants by the City rather than by project developers.) As a result, large projects are approved without an honest appraisal of impacts. And, even when the impacts are more forthrightly evaluated and impacts identified, the City moves forward to approve the project(s) nonetheless—stating that the project approval is being made due to "overriding considerations." (There was only one EIR we can remember—the EIR for LAX—that concluded with a recommendation that a project ALTERNATIVE be adopted– as opposed to the project being presented by the developer.)

While the process of doing an EIR with its deadlines is, for the most part, carefully followed, the content of those EIRs too often lacks critical analysis. In too many EIR documents, project impacts are understated or ignored, and as a result mitigations are not required or provided leaving the City and its residents, taxpayers and/or future projects to assume the burden of addressing those impacts – direct and cumulative. This disconnect between land use project evaluations and transportation infrastructure is apparent not only in the Westside where the situation has reached a crisis level in many locations, but Citywide. The need for street and alley repairs is widely recognized with failed street surfaces making travel on some streets a true challenge for vehicles – to say nothing of bicyclists willing to brave tire consuming (and potentially life-threatening) potholed streets. When funds become available to finance improvements identified by the above-referenced projects, they will likely be used to make up for the ever-widening gaps and failures that exist in our transportation networks TODAY. (Does the need for these funds create an artificial incentive for approving more projects?) A review of the City's Infrastructure reports going back to 2003 shows that even then, the overall assessment of our City's streets and highways was given a D+ grade. The goal at that time was stated to have a "Street network pavement condition shall be maintained at "B-" or better, with no pavement rating below "D"." It should be further noted that the stated ten-year investment need was for "$ 1.5 billion for pavement and $0.7 billion for congestion relief." Needless to say, those funds were not available and the situation has only worsened on our streets as pavement condition (street and sidewalks) continues to deteriorate and congestion grows. The City will continue to be that dog chasing its tail as demands from ambient traffic and population growth increase, and as new impacts from

new development are added into the mix (especially if future EIR reviews continue to underestimate or ignore traffic/infrastructure impacts). The underestimation of project generated traffic must be addressed. There must be a feedback mechanism between data contained in EIR documents and post-construction reality. In fact, by creating a mechanism to test reality and to evaluate the veracity of EIR traffic data, the City could develop a **new source of funds** to support the projects and programs defined in the CTCSP/WLA TIMP. In addition to raising funds from assessments on new development, the City could opt to levy fees based upon actual project impacts should they significantly differ from the projected impacts in project EIR documents. By establishing a protocol to capture trip data *after* a project reaches a set level of occupancy, the City could then compare the estimated trip generation data to actual trip count data. If a significant variance were to be found, then a set formula could be applied to obtain additional funds for the CTCSP/WLA TIMP. That funding source would continue until the project reduced traffic to meet estimated levels. Those funds could not only be used to fund CTCSP/WLA TIMP projects, but a percentage share of those funds could also be designated to be used for more local traffic/bike/pedestrian safety improvements in the areas nearest to the individual project (found to be out of compliance with its EIR documents). A mechanism to generate a list of more local "smaller" needed neighborhood mitigations (complementary to CTCSP/WLA TIMP objectives) could be developed by recognized community groups such as neighborhood and community councils, homeowner associations, etc. In this way, local communities would have a way to address unrecognized traffic impacts from developments approved in their areas. (It might also serve as a mechanism that causes EIR documents to be done less optimistically (more honestly and will reduce the need for local communities to bring litigation against the City and developers following the EIR review process.

A feedback mechanism is needed not only to cause EIR data to be more accurately compiled, but it will also provide the City with much-needed information upon which to evaluate future projects and their impacts. Not only is post-project construction data important to determine if additional mitigations should be required, but the information will provide the City with data needed to evaluate future projects and their impacts. While we often compare Los Angeles to New York, Chicago, Portland and other cities, many of us believe that Los Angeles' setting, with its unique geographic characteristics (including a mountain range dividing its City and Valley regions), and a supersized area nearly 500 miles across) may make such comparisons problematic at best – misleading at worst. Without data that reflects our Los Angeles experience, we lack a critical tool key to evaluating where we are and where we need to be going. Such data is also needed to provide support to applications that the City may wish to submit proposals/applications for funding for transit-related projects. Such opportunities often require having a ready set of data on hand to meet application deadlines. Data compiled from other regions (even ITE data) can only be considered as secondary to data gathered first hand from actual usage in Los Angeles. It is time to develop a mechanism to methodically gather and monitor such data. The City needs to develop thresholds for how often cetain sizes / types of projects are monitored.

What does a "transit oriented development" really mean when it comes to trip generation along light rail routes in Los Angeles? Which developments are truly "transit oriented developments" and which projects are merely "transit adjacent developments." Does the City know whether all developments should contain the same parking requirements (for vehicles and bicycles), or should there be different requirements depending upon the proximity to rail, etc.? New bicycle parking requirements have not been evaluated and need to be assessed as they are applied in various settings. Project conditions should include funds for the City to perform project monitoring and trips counts to be done by the City (unannounced and at established intervals when a project reaches set occupancy levels). How can the City's land use process promote the best uses of land? We need to build smart, to reduce long trips and encourage transit use. However, we do not know how to reach those goals. As we have seen, City and State policies meant to create affordable housing actually serve to hasten the demolition of our City's affordable housing stock. We seem to have developed a process of displacing working people in close proximity to transit. Do the efforts to change work hours improve mobility or do they instead merely serve to prolong peak hours of congestion? Does the reduction of vehicle miles traveled accurately translate into a reduction of congestion in key locations?

In addition to the absence of a feedback mechanism that links reality to EIR document statements, there is yet one additional large disconnect between the land use entitlement process and our community's and City's current and future mobility. By FAILING to enforce **project conditions** placed on approved projects, additional impacts are often generated and go unrecognized and unaddressed. Responsibility to monitor project conditions must be clearly defined between City departments/staff and a transparent process for tracking compliance must be implemented.

While new "miles traveled" criteria are to be used by the City to assess traffic, the older LOS data/figures should not be abandoned by the City to measure traffic/congestion and the impact of development and mitigation measures. This new measurement standard of "miles traveled" has relevance but is a new concept based on computer modeling. During a transition time, (and until we can see that the VMT figures are able to generate needed data related to traffic impacts and needed mitigations), it is suggested that LOS data continue to be gathered and included as an element of traffic/congestion analysis.

The relationship between transit and land use planning is an important one. However, we wish to note that the City's identification of "transit corridors" and treatment of all so-called "transit corridors" similarly is misleading and harmful to our local community as well as many others. Some major arterials that have transit routes are well suited for added development and density. However, some major arterials – especially those that are located on streets where congestion is particularly high – and those that play a key role in defining a community's character (for example a local business district), -- should not be viewed merely as a palette for redevelopment. There needs to be a way to recognize the community's desire to retain community character, local retailers, etc. It is too easy and counterproductive to markedly increase a boulevard's density merely due to proximity to transit. The City must review all relevant factors such as existing density levels, traffic, employment and education hubs, etc.

We will now endeavor to make comments on the specific points raised in the NOP page by page.

Page 9: FEES and EXEMPTIONS: We would recommend evaluating additional mechanisms for generating fees to finance projects and programs including the fees noted above related to deviations from EIR data. We would propose study of an option to develop a possible fee on each new parking space provided in larger developments (over a certain number of square feet or units depending on the type of development).

There is a clear need to develop ongoing sources of income for the TIMP if, for example the types of projects to be funded include ongoing expenses such as the operation and maintenance of community shuttles. It is important that fees be levied and impacts taken into account on residential multi-unit developments of less than 49 units. The exemption of all multi-unit projects less than 49 units has resulted in significant traffic impacts particularly on blocks and in areas where a large number of parcels have been converted from low-density development (single family homes, duplex and triplex structures) to 12, 24, 36 and up to 48 unit developments. The current 49 unit threshold has likely served to create a ceiling for the size of some projects. Rather than institute a new fee on ALL residential projects, perhaps a model that imposes the fee on the portion of a project that exceeds the current land uses? Could, for a residential project, the fee be based on the difference between the number of bedrooms currently existing and the number of new bedrooms? (Placing a fee on the number of units could artificially serve to create an incentive for building apartments with a large number of bedrooms in order to avoid the fee.) Would it be more equitable to levy a fee on a single family home based on the number of added square feet to the property (rather than on the entire home)? Would the fee be triggered during a home remodel or only when a home changed hands and was remodeled or rebuilt? The existence of a new type of project, the small lot subdivision, invites an opportunity to assess the fee on all such new units. The movement to require traffic mitigation fees on residential projects is a long-needed change in policy in LA City.

WLA TIMP mitigation fees will be a function of projects eligible for the fee. Thus, the fee is inversely proportional to the schedule of eligible projects. That may be noted Appendix C of the WLA TIMP but it's not included here. Thus, one would expect there to be a change in the level of the fee (the rate) as more land uses are fee eligible. Or, if the fee is held at its current level, then a corollary issue: what is the expected effect applying the fee to land uses formerly exempt? The NOP/Scoping document asserts that, "The proposed project would not result in the development of residential uses and, therefore, would not induce substantial population growth in an area," (p. 29). But, if the fee diminishes residential development, then it will also reduce transportation impacts. At least the EIR should acknowledge this effect.

Current traffic studies do not look at non-signalized intersections; they look only at signalized intersections. This is but one flaw in the manner in which traffic studies are done. There is a need for consistency for traffic studies to assess key elements. They

must be informative and generate accurate information to improve future planning and assess actual impacts.

In order to retain an exemption for schools and places of worship, we would suggest exploring the possibility that the exemption be accompanied with a mandatory set of conditions to be placed on any such projects. For schools, mandatory carpool programs and/or cooperative bus programs with nearby schools should be part of a set of conditions regardless of school size or location. The opportunity to have shared use of available parking to benefit nearby businesses or community uses should also be available as an option for schools and places of worship to avoid or reduce fee assessments. The impacts of schools on peak hour travel can be quite significant; new traffic generation should open the door to negotiations to seek community / area benefits. Because religious institution facilities are not all always used during traditional "work" hours, there may be opportunities to better utilize related parking resources when not needed by the institution. (Could TIMP fees be used to cover additional insurance costs when parking facilities are used by outsiders for a greater community benefit?) (Could parking fees cover those costs and then be used to replenish TIMP funds?) There needs to be a mechanism to foster such discussion and arrangements. (Schools run by religious institutions must also be a part of the discussion.)

We would suggest that the threshold for assessing retail establishments be changed. With the advent of mixed use buildings, we are seeing more and more buildings with smaller retail spaces (but many more buildings with retail incorporated). The exemption of the first 30,000 square feet will remove a large proportion of property from the responsibility of sharing in assessment generation while they are cumulatively creating significant impacts worthy of mitigation – particularly on the Westside where there is little unused roadway capacity.

While we have many suggested uses for TIMP funds, we recognize that one of the most effective uses of the TIMP fund is when it is leveraged to obtain larger grants and applied as matching funds.

Under the current program, CTCSP and WLA TIMP fees are generated based upon the number of new trips generated by the new development within the specific plan area. We would like to stress that it should be a City responsibility to gather actual trip data prior to an emptying of a building so that the assessment can be based on reality (as opposed to ITE estimates). It would also be quite instructive to compare ITE estimates to actual data collected so that the City can determine how accurate or inaccurate the use of ITE data might be.

It would be quite useful to note any correlations between data generated on vehicle miles traveled and LOS. Is it possible that we could see positive data generated re: VMT reductions but not see any accompanying improvements in LOS? Is it possible to see VMT reduction and a worsening of LOS at specific locations? If true, this would suggest

that the City should gather data for both VMT and LOS conditions – particularly in the early years as VMT data is first gathered and applied. Where have the VMT models been used and for how long?

If the TIMP, CTCSP and other related programs have as part of their transportation improvements items other than those more traditionally funded (brick and mortar type projects), then there may be a need to develop ongoing funding mechanisms beyond those tied to new development generated sources. Could, for example, the TIMP provide funding (or start-up support) to a community shuttle that brings riders to key EXPO locations? Or, rather than have the Century City TMO run their own shuttle, would the TIMP be involved in serving as an intermediary for supporting additional bus service from EXPO to Century City by the SM Big Blue Bus? (At a recent SM BBB presentation on contemplated route changes post EXPO opening, there was considerable concern voiced about the proposed increase in wait time for the EXPO Palms to Century City bus that travels along Motor Avenue. The current frequency is reported to be every 20 minutes with the proposed frequency suggested at once every 30 minutes (with no additional peak hour service runs!). Clearly there must be additional transit provided at more frequent intervals if we are to successfully reduce vehicle traffic in the Century City area and on Motor Avenue in a meaningful way. There must be a reliable and efficient way to make the final connections to work and to transit for the return trip home.

Another project that could be funded by the TIMP is the provision of transit area station parking. . The list of traffic improvements fails to acknowledge city funded parking structures and yet we are likely to have overflow parking in the area surrounding the Palms, Westwood Blvd., Sepulveda transit station and probably others. Although it may be an aspiration that the public will not use cars to access transit, to the contrary, parking lots and structures are well used adjacent to light rail in Culver City. Does LA envision that it has no responsibility to accommodate transit users other than with bike racks? Failure to make transit use convenient will limit its positive effects on Westside roadways. Consider the Bundy intersection/station, for example. This is a missing element in the city's plan for Westside mobility. This would fall under the category of "Bus and rail transit, transit stop enhancements," (p. 13) as "...capital cost of specific local projects with a regional benefit..." (ibid).

Cities around the country have demonstrated that having available parking is critical to drawing riders to transit from the suburbs. METRO will never (and should never) provide transit that reaches into the sparsely populated hillside streets of Brentwood, Westwood, Bel Air, etc. Yet, there will be residents there who will happily use EXPO to reach destinations downtown, near USC and along the route. However, with the EXPO train built with a bare minimum of parking (and with no relationship to expected ridership), there is a crisis already –even before the train enters Phase II operation. The Venice/Robertson parking lot is already full before morning peak travel hours have concluded. Folks who drive to the station there are often leaving unable to park. They may attempt parking at LaCienega Blvd. but once that far east they are often inclined to keep driving --- all the way to their destination. TIMP funds may be needed to IMPROVE stations just readying to open because of inadequate planning and resources

devoted. Parking at the Sepulveda station was based on available land – not on potential ridership. The lack of a kiss and ride for traffic from the north (coming southbound) at Westwood station is certain to create traffic impacts and will bring a steady flow of traffic to residential Exposition Blvd. just north of the tracks. Dedicated loading areas for handicapped passengers are non-existent. A much-needed Westside Transit Center adjacent to the Sepulveda station has received little support from transit planning agencies. The EXPO Authority seeks only to build the project. LA City seems to defer to METRO. METRO seems to defer to LA City and working along the EXPO route has become a frustrating experience for many who merely seek to improve transit connections, to green the parkway between Overland and Westwood, etc. Perhaps TIMP dollars can be used to address shortcomings discovered post-construction on the EXPO project. Each project has items that were not anticipated as well as unanticipated negative impacts that need to be addressed. The construction of parking and acquisition of land for parking is an item that the TIMP may need to be used for. The possibility should be explored in environmental documents so that it can be an option if needed. Likewise, the operation of community shuttles, valet services, etc. should be included as possible projects.

Page 10: List of Transportation Improvements:
Roadway Improvements: Included in the current document is the improvement of the Bundy Drive I-10 ramps. Is there already funding available to address the Robertson Blvd. I-10/Venice Blvd. configuration once the EXPO construction has been concluded? It may be sensible to broaden the geographic boundaries of the WLA TIMP to include going east to Robertson Blvd. and south to the I-10 on and off-ramps because those freeway conduits are closely linked to Century City impacts/congestion. While the Robertson exit also services all of Beverly Hills, Cedars Sinai Medical Center and the westerns portions of West Hollywood, the Robertson off-ramp carries significant Century City-bound traffic. It is of concern to us that all bicycle projects have been exempted from CEQA review because the addition of bike lanes that remove traffic lanes will undoubtedly push traffic from arterials onto nearby small residential streets. We would urge the project to look at the costs of provided "real" bike facilities so that riders do not have to share the road with large buses and gridlocked traffic.

Getting past the 405 freeway on any of the major east/west arterials from Santa Monica during most afternoon / early evening hours is a major challenge. As has been mentioned in the early input sessions, a major capital improvement project that provides for a route to expedite through traffic past the 405 is needed. This major expenditure would save hundreds of lost work hours each day and reduce greenhouse gases and improve the quality of life for all east-west commuters. An EIR for such a project should be a high priority for the City. (It will be interesting to see whether EXPO Phase II makes a noticeable positive impact to reduce that west to east congestion each afternoon.)

While the City of West Hollywood clearly lies outside of the LA City limits and the area of the WLA TIMP, it would strongly benefit LA City if certain transportation improvements were made that service the West Hollywood area. If a subway extension reached into West Hollywood, we might see a meaningful decrease in traffic along Santa

Monica and Wilshire Blvds. For that reason, we raise the question as to whether or not TIMP funds / resources should be used to support the work of the Westside Cities COG Transportation Committee and its advocacy to identify funding opportunities and to jointly seek funding for Westside transportation projects that benefit the City and region. (The COG has been fairly dormant for some time most recently following the loss of key staff and it is not known as to the reasons for what appears to be continued diminished activity.) The continuation of the bike lane on Santa Monica Blvd. into Beverly Hills is, we believe, currently under consideration in Beverly Hills. Los Angeles' participation in that discussion would hopefully be meaningful.

They key transit improvement for the Westside that has long been needed is the provision of public transit along the 405 freeway to connect the Westside to the San Fernando Valley, LAX and eventually to the South Bay. This has been viewed as a Westside transit improvement by many outside of the Westside but that couldn't be farther from the truth. The Sepulveda Pass and its traffic impact hundreds of thousands of commuters daily. It is often said to be the world's largest used car parking lot. What can the TIMP do to support progress toward the development of public transit along this route?

Intelligent Transportation Systems: We applaud the use of new technology to help improve circulation and to minimize time wasted in travel. At some point all signals will be automated. How much more efficiency can be achieved? With current phone applications, many drivers are relying on their phone programs to chart a route through neighborhoods to avoid congestion on major arterials. How can the intelligent transportation systems work to maintain safety in residential communities adjacent to major arterials? LADOT has limited options even if/when all intersections can be monitored in real time conditions. As we all know, on the Westside, north/south connector streets are at a premium and highly over-utilized.

Transit improvements: With the addition of each new BRT, data must be gathered to demonstrate impacts on riders and drivers (of cars and bikes). Does METRO or any of the municipal bus lines have data that indicates whether or not the buses now in circulation are turning away bike riders because of limited bike rack capacity? Is there a way to increase bus bike-carrying capacity while ensuring the security of bikes on buses?

Key to increasing transit ridership (beyond providing the actual light rail and other lines) is the availability of seamless transfer from one form of transit to another allowing for the timely and cost effective completion of a trip from door-to-door. Our Westside Mobility Plan must be able to address shortcomings in the local system and provide funding to "fix' the problem while slower bureaucratic entities develop long term solutions. Can the TIMP have the ability to administer a fund for addressing emergency-like, time-limited problems? If not, which entity is best suited to do so?

Trip Reduction Programs: It is certainly laudable to include the establishment of systems for real-time parking information. However, the application of Dr. Shoup's philosophy in areas of the Westside is problematic at best. His philosophy of raising parking rates such that only one or two parking spots on each block remain available is a

sensible model in locations where parking is adequate. However, in areas where parking is noticeably in short supply (and where price is not necessarily a barrier), the application of his policy will be to create a high class parking district – where those unable to pay the high rates will still be destined to circle, circle and circle. Each community needs to review its parking availability, options for parking and establish maximum parking rates. For those living in hillside areas, it is not easy to use transit (or a bike) to come to Westwood Village. Because we do not want those folks circling blocks repeatedly, what kinds of public parking can be developed to serve the community? Parking meter funds that were meant to be invested in community parking facilities have been routinely nationalized by the City to help make up for chronic budget shortfalls leaving our community parking resources limited in key locations.

We do not know how the Angeleno behaves when taking up residence in proximity to transit. Does the average Angeleno maintain a vehicle for occasional or weekend use? Because New York, Chicago and San Francisco are all very different compact cities, their data may not be applicable to the Los Angeles situation.

How can the City provide incentives for the construction of fully automated parking facilities as currently being installed across Europe? Such facilities reduce gasoline consumption and optimize land use (and are often underground).

To maximize the use of the EXPO Line, additional parking at the CASDEN project site at Exposition and Sepulveda is needed. We have long proposed a TRANSIT CENTER to be located there on a portion of the land. In addition to parking for riders, there must also be a self-serve transit info center, handicapped access from drop off location, kiss and ride, bus layover locations, passenger seating areas, shelter from the elements, rest rooms, trash receptacles, route maps, schedules (including real time arrival estimates along nearby routes), bike routes, bike racks and lockers, explanations of fare options, water, rest rooms, etc. This transit center needs to connect various transit providers as well as various transit modes… into a multi-modal transit center. (It could also connect bikes, AMTRAK with METRO service.) The Casden staff told us during their earlier entitlement proceedings that they could not interest transit officials in the notion of having a transit center at their project and that they were willing to provide space for some transit center functions. Yet, transit operators tell us that the Casden folks were not interested in providing for layover space and other amenities. The Casden project is currently in litigation. It would be wonderful if the transit folks could get their act together and determine exactly what they need to have at the site in order to have a Westside Transit Center operation there. TIMP funds should be available to help support the ongoing operation of such a location (in addition to funds/support from all the connecting bus line carriers, etc.).

A key way to reduce travel along the 405 corridor to LAX is to have the Westwood LAX Flyaway stop at EXPO Sepulveda en route to and from LAX. This seems to be the easiest (and quickest) way to connect LAX to METRO transit. It will require no new tracks to be laid, no new bus purchases, etc. Yet, it could serve to reduce traffic along the 405 corridor between WLA and LAX for years to come and increases the impact of the

EXPO line. Could TIMP funds be used to help support a pilot project like this (and/or others)?

While TDM programs are very good things, our experience with them is that they are often a condition required of projects that never get fully established or function in a meaningful way. It was for that very set of reasons that our WSSMHOA lobbied Westfield to help establish a Century City TMO. It is very possible that a Westwood Village TMO should be formed in conjunction with the BID (or that Westwood Village should be part of an extended UCLA TDM/TMO). How can the TIMP play a role in encouraging the better operation and the monitoring of project conditions such that required TMO's are workable entities? In addition to targeting individuals with TDM Toolkits, perhaps tools must be offered to buildings that are required to provide TDM's as well so that they can be more successful with their programs.

Bicycle and Pedestrian Improvements: A BRT is being proposed for Santa Monica Blvd. Portions of SM Blvd. along the SM Blvd. Multi-Modal project already have a small dedicated bike lane. What is lacking along Santa Monica Blvd. between Century City and the 405 Freeway right now are bus shelters for bus riders. The bus shelters that are constructed as part of the City's Street Furniture program are provided through a contract with CBS/Decaux to provide shelters with advertising posters. Because Santa Monica Blvd. is a scenic roadway, the community has long opposed the installation of advertising shelters along the route. Yet, bus riders need these shelters to protect them from heat, sun and (hopefully) rain. TIMP monies, particularly those generated from Century City area development, could be used to purchase, install and maintain SM Blvd. bus shelters.

The City has developed its bicycle plan on the cheap. With signs and paint it has attempted to create a bike plan overlay on streets operating at capacity with bike riders riding at their peril in a sea of cars, SUV's, buses and trucks. It is time to develop funding mechanisms to establish bike routes that are separated from major traffic flows where a safe riding experience can be provided for the novice as well as the regular bike commuter. In a built-out city this is no easy task. Nonetheless, it must be pursued, particularly where higher populations of bicyclists exist. We have been frustrated with the proposed placement of a bike lane on Westwood Blvd. and do not believe that sufficient effort has been invested to locate an alternative route that will connect riders between EXPO and Westwood Village/UCLA area. A process is needed to evaluate alternatives that will not negatively impact businesses and nearby residential streets and that will attract local users not comfortable with riding on such a busy arterial. We see so many opportunities to provide creative incentives in order to create a win win situation to reduce traffic on a street designated for bikes while also reducing vehicle traffic for the residents on that street. Could TIMP funds be used to create pilot model programs implementing creative incentives (such as removal of parking on one side of a street and the granting of city subsidized parking permits for residents on the remaining side of the street)? Could a small neighborhood traffic management program staff be re-constituted at DOT to work with the community in the identification of potential bike routes? We do not necessarily agree that it is good to slow traffic in order to make it safer for bikes to

traverse Westwood Blvd. We are very concerned about neighborhood cut through traffic that would render our local streets unsafe for pedestrians, drivers and bicyclists who now use them.

Whatever happened to the Veloway proposal presented by bike advocates over 20 years ago? Are portions of it viable? Bike lanes cantilevered over storm drains/channels?

The closure of the DOT's NTMP –Neighborhood Traffic Management Planning unit during the City's most serious budget crisis has had long lasting impacts on our community's ability to address nearby project impacts. Even when we have funds provided by a developer to install speed tables on a street heavily impacted by Century City cut-through traffic, there is no formal mechanism now in existence at the City to evaluate possible locations, do the necessary engineering work and contract to install the speed table(s). It does not exist. Our HOA is not in the business of hiring contractors or taking on the responsibility/liability for the speed table once constructed. That is a City duty and responsibility. We need to be able to have a mechanism to implement such traffic calming measures. Other communities also need this and at the current time there is a hole in the City's organization chart for such activities.... even when we have the funds to pay for the necessary work. How can the Mobility Plan address this shortcoming and missing link?

Page 11 /Green Streets: Our Association strongly supports the Greenway project to be built between Overland and Westwood Blvd. along the EXPO tracks. TIMP support of this project is a worthy investment.

Components of the Westside Mobility Plan:

2) Rail Connectivity: The question as to how to connect METRO rail to LAX appears to have been finally solved. Should this be removed from the schope of study? We have already mentioned a West Hollywood subway connection. While this is not in the study area, such a connection will improve the connectivity of all of West Los Angeles to points east and south.
3) Westside Parking Study: We would request a study of needed parking to improve and support EXPO ridership.
6) Livable Boulevards: While each of the areas specified are of interest to us and are worthy of special attention leading to physical improvements, we are most concerned with the stretch of Pico Blvd. between Sepulveda Blvd. and Patricia Avenue. That area borders our residential community and can be looked at as the commercial heart of our neighborhood. It is also the site of a recently received MTA grant to promote pedestrian safety/activity.

   We are opposed to the rezoning of the area that would result in added heights adjacent to single family residences. We would prefer to first experience the opening of EXPO, to see the changed traffic, bike and pedestrian patterns, to see related changes on the business corridor, etc. before having the City and community consider any zoning changes.

Page 18: There is reference regarding removal and replacement of street trees as a result of any subsequent traffic improvement projects. Where trees are removed, they should be replaced expeditiously and with trees of similar canopy to preserve the aesthetics of areas impacted by those projects.

How does the city envision transition of possible bus rapid transit (BRT) lanes into rail?

Page 19: Aesthetics: Mention is made of the designated Santa Monica Blvd. Scenic Corridor. It is our understanding that a formal Scenic Corridor Plan has not been adopted for Santa Monica Blvd. We wonder whether such a plan could be incorporated into the environmental work being done for the WLA TIMP process. It is long overdue and there is no telling when the WLA Community Plan might move forward toward revision leaving SM Blvd. without full/complete designation and the added protections that might bring. Possible?

Our community has long opposed the construction and/or operation of any digital signs in our community's area. We believe that digital signage is distracting to drivers which compromises the safety of drivers, passengers and pedestrians. We also oppose the night pollution generated by such signs. We also seek the removal of traditional billboards however best possible for aesthetic reasons. We support the goals of the 2002 City Sign Ordinance which stated that there shall be no new billboards. We do not support the construction of new signage of any type in order to raise funds to augment City budget resources.

Page 22-23: Geology and Soils: We await State mapping of the fault located along Santa Monica Blvd. to determine what potential impacts might be expected from seismic activity along this fault. However, we do not foresee that that mapping would impact the work of this project.

Page 27: Hydrology: There is no mention in the Hydrology Section of the Greenway Project alongside EXPO yet that Greenway Project is directly related to the surfacing of the contents of a storm drain and the replenishment of the local water table by the sunshining of the storm drain contents (originally from the "creek" alongside the Bel Air Hotel). This project will have local beneficial impacts and will also serve as a model for other communities across the City. In addition to creating a new green open space, the greenway will reduce stormwater runoff going to the ocean. If the Greenway Project would benefit from mention in the mobility-related environmental documents, it should be included. It should also be included if that is necessary to the Greenway Project being eligible to receive additional funding through the TIMP or other City fund.

Page 28: Land Use and Planning: Because development in close proximity to transit provides developers with certain benefits (included added density and reduced parking), there are new and increased pressures on land in close proximity to transit. Some of that land is zoned for light industrial/manufacturing uses. In our community, the Community Plan seeks to save that land for its designated uses – as opposed to being re-zoned for office, retail or residential uses. It is sound planning to retain land in close proximity to

rail for jobs and also for the types of functions that can only be done on such zoned lands. We would hope that the project environmental documents underscores the importance of respecting community land use designations. How can that sparse industrially zoned land be best protected? How can the City use its planning resources to protect zoning in Community Plans and protect it from political influence and spot zoning efforts? Is there a way to create incentives for retaining job-preserving (existing) zoning?

The City needs a way to provide for housing / development incentives where developers are not likely to build without them. Providing bonus densities on the Westside where job and housing densities are among the highest in the region seems completely counterproductive.

Page 30: Traffic / Transportation: One of the major challenges faced in working to improve mobility is the issue of finding balance between various transportation modes when, for example, some bicyclists believe that they should have priority on all roads and some drivers believe that cars should have priority on all roads. The true challenge is in encouraging alternative transportation without crippling how our roadways work (or without significantly reducing their functioning). How the City will choose to define impacts will have a great bearing on the outcome of this current debate. How the City chooses to balance the goals/wishes/desires of a small and growing percentage of bike riders against a large percent of Angelenos who will not be joining the ranks of bike riders will contribute to the tone of the evolution of transit in Los Angeles. There are few benefit to turning our streets into a battleground of drivers vs. riders and it is important that City planners and transportation staff understand the sensitivity of their task. We do not live in New York, Chicago or Portland. It does no one any service to underestimate the impacts of change... whether in the review of a large office building or in the installation of a bike lane. It is important not only to build a new bridge across Lincoln Blvd., but it is important to build bridges of communication between the involved constituents across the area.

Thank you for your consideration.

Sincerely,

Barbara Broide

Barbara Broide
President

May 24, 2014

Dear Ms. Pallini-Tipton

Please integrate the enclosed "Greening The Boulevard" Master Plan concepts for Venice Boulevard between Lincoln and Sawtelle into the EIR and proposed amendments for the Coastal Transportation Corridor Specific Plan (CTCSP) and West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP)

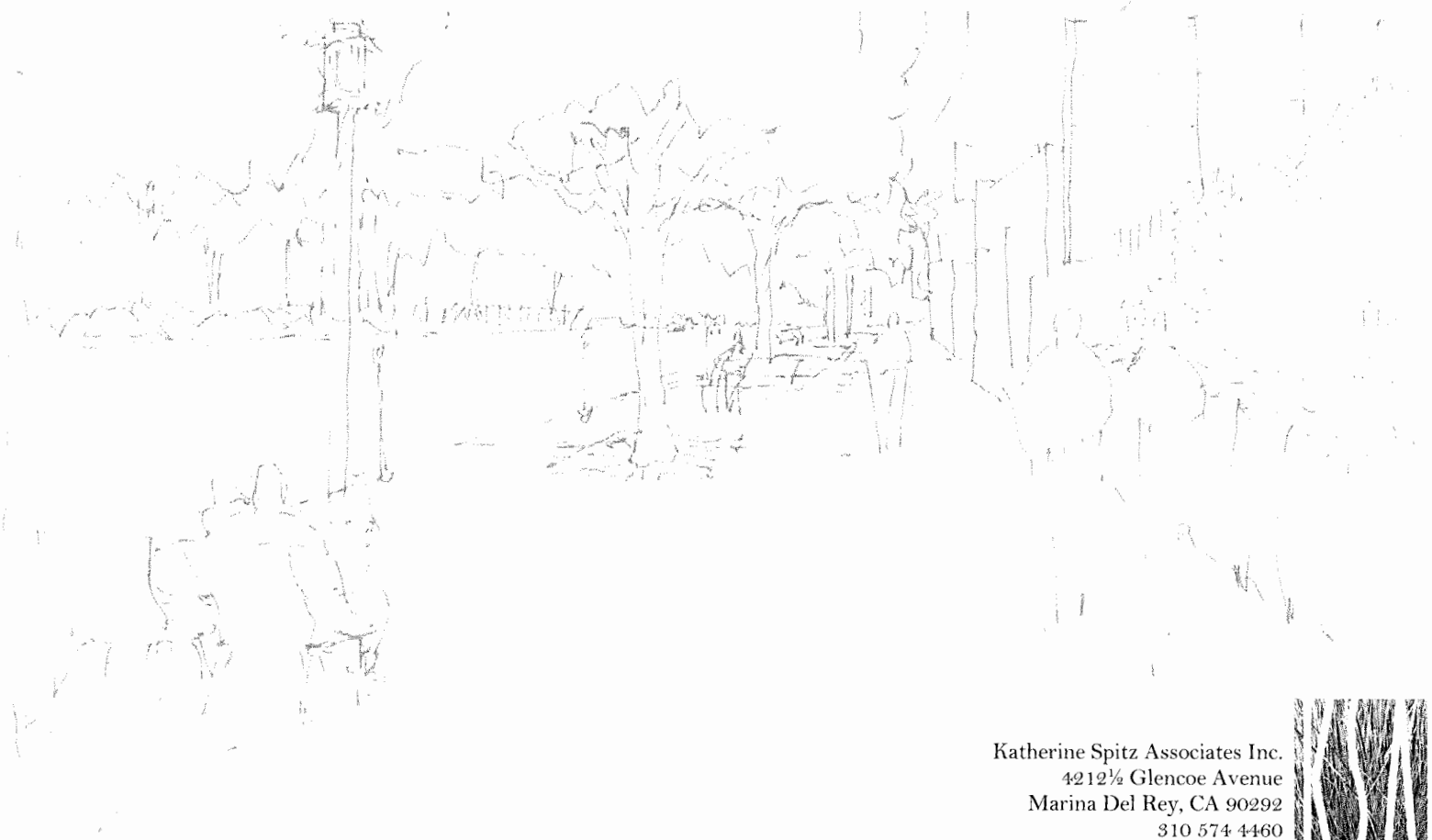
Contact Steve Wallace at 310-714-9225

stevew@marvista.org

sent separately by e-mail with attached pdf

GREENING THE BOULEVARD

Master Plan Concepts for Venice Boulevard between Lincoln and Sawtelle



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January 2008

Prepared for the Venice Boulevard Streetscape Improvement Association - Steve Wallace 310-714-9225

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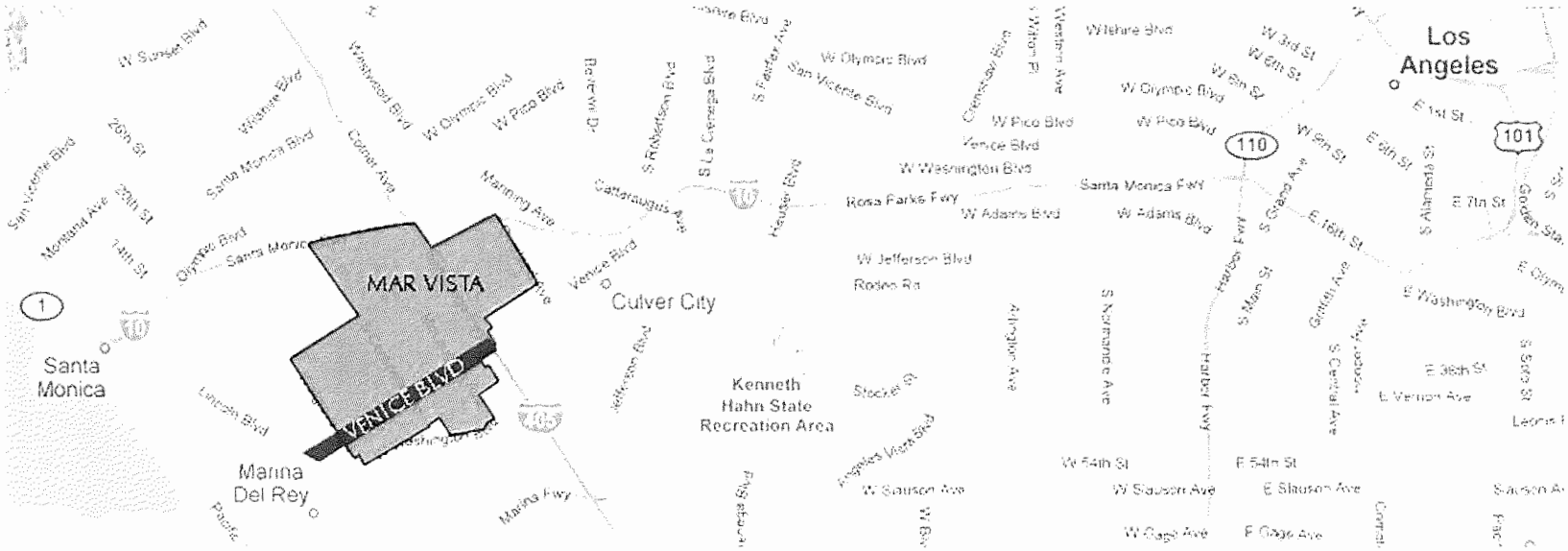
Overview

Project Location

Venice Boulevard stretches eastward from the Pacific Ocean to downtown Los Angeles, California. Along its 13-mile length it traverses many diverse urban communities. This master plan concerns itself with the portion of the boulevard that transects the historic core of the Mar Vista neighborhood from Lincoln Boulevard to Sawtelle Boulevard.

Mar Vista History

The community of Mar Vista was first named and annexed as a district of the City of Los Angeles in the 1920s. During the first half of the 20th century, it was an integral component of the Pacific Electric Railway mass transit system that connected much of southern California. The Venice Short Line streetcar or the "Red Car" travelled through Mar Vista along Venice Boulevard. Today Mar Vista is an economically diverse neighborhood and its boundaries as defined by the Mar Vista Community Council (MVCC) are shown on the diagram below.



Master Plan Background

This master plan is the result of community efforts commencing in 2002 with the founding of the "Merchants of Venice" group. Since then the master plan has been guided and developed through the efforts of these community members and the subsequent commitments of time and effort by city staff, council office and additional community members and groups.

Overview (cont'd)

Master Plan Implementation Goals
The master plan demonstrates strategies for transforming Venice Boulevard in Mar Vista into a vibrant, successful and sustainable neighborhood street. The master plan design improvements are to be implemented in several phases over a period of time. The purpose of the master plan is multifold. It will establish a framework for a series of future streetscape improvements. Secondly, it will help determine the following criteria for the proposed components:

- Ability to be funded
- Ease of implementation
- Degree of independence from other proposed components

It will also help realize and participate in specific 'catalytic events' to provide energy and enthusiasm for the future fundraising of the proposed components. Several of these events have already been implemented. The year-round Mar Vista Farmers' Market on Grand View Boulevard at Venice Boulevard started in August 2006. This Sunday market has been used several times as a forum to collect community input on overarching concepts and individual components of the master plan. The newly landscaped medians along Venice Boulevard between Centinela Boulevard and Inglewood Boulevard, implemented as a preview of the master plan, were another a 'catalytic event'. Most recently, several sidewalk parkway plantings outlined in the master plan were installed by community volunteers during the 2008 Mar Vista, Venice, Del Rey Mayor's Day of Service.

Urban Design Strategies
We envision Mar Vista as an outdoor dining destination with attractive and successful shops, lively evening uses and an expanding farmers' market, rather than a district where vehicular traffic speeds through en route to other destinations. Venice Boulevard in Mar Vista is a unique street with its broad dimensions and continuous median. Its wide sidewalks, traffic lanes and parking lanes can easily accommodate reconfigured bike and vehicular traffic lanes, enhanced stormwater percolation, a drought-tolerant plant palette, energy-efficient pedestrian lighting, pedestrian-friendly intersections, additional trees with overhead canopy and festive banners and street furniture. The subsequent pages of this booklet illustrate the two major design thrusts of the master plan:

- Create a sustainable, green street
- Create a vibrant, beautiful neighborhood street that will be a magnet for Mar Vista

These illustrations have been previewed by the community at both the Mar Vista Farmers' Market and the Mar Vista Public Library to start to gather input and garner enthusiasm for the master plan.

Proposed Design Improvements

The numbers below correspond with the numbers on *Illustration 1 - Venice Boulevard between Lincoln and Sawtelle Master Plan.*

1 *Sidewalk Improvements*
Create social spaces for informal gatherings and sidewalk cafes with 7' minimum width
Provide public amenities such as benches, trash receptacles and pet-friendly waste stations
Incorporate public art and enhanced pavement
Encourage economic investment

2 *New Sidewalk Trees*
Establish a strong identity for the district
Create a street that looks cared for and well-maintained
Replace existing diseased or mutilated sidewalk trees while increasing total number of trees
Provide dappled shade for pedestrians, sidewalk cafes and parked cars
Allow visibility of commercial storefronts

3 *New Stormwater Parkways*
Reduce stormwater runoff with linear gardens or permeable paving
Provide a vibrant setting for civic gathering spaces

4 *Sidewalk Bike Lanes*
Separate bicycle riders completely from vehicular traffic
Encourage alternate, sustainable transit
Provide a wide, planted buffer zone between pedestrian and vehicular circulation
Incorporate solar-powered lighting to illuminate path at night

5 *New Pedestrian-scale Sidewalk Lighting*
Creates safer and brighter pedestrian and biking environment at night
Encourages desirable nighttime activity such as sidewalk cafes
Recalls pre-WWII era Venice Boulevard Pacific Electric Railway "Red Car"

6 *New Bus Stops*
Provide new seating, planting and shelters
Encourage use of the public transportation
Integrate sustainable, solar-powered LED lighting

Proposed Design Improvements (cont'd)

The numbers below correspond with the numbers on *Illustration 1 - Venice Boulevard between Lincoln and Sawtelle Master Plan.*

7 *Curb Extensions at Intersections*
Promote pedestrian safety by shortening crosswalk distance
Provide additional areas for plantings along sidewalks
Reduce apparent width of roadway from the driver's perspective

8 *Crosswalks Paving Enhancements*
Provide clearly marked and more continuous pedestrian environment
Ensure safer pedestrian circulation
Recall pre-WWII era Venice Boulevard Pacific Electric Railway "Red Car"

9 *New Median Plantings*
Establish a strong identity for the district
Create a street that looks cared for and well-maintained
Replace existing concrete with plantings
Increase total number of trees along the boulevard
Minimize glare and eye strain from on-coming traffic for drivers

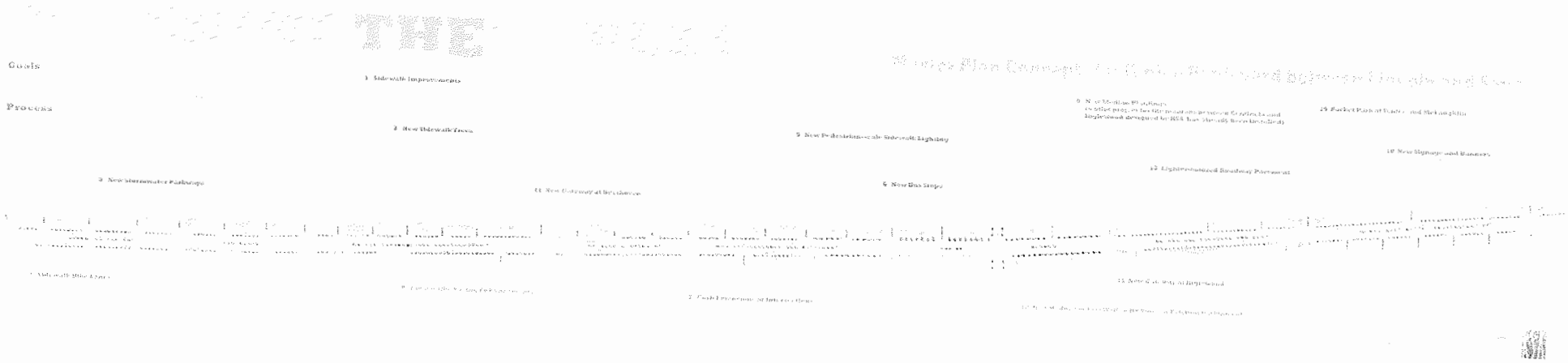
10 *New Signage and Banners*
Strengthen neighborhood identity
Announce local events along boulevard such as the farmers market

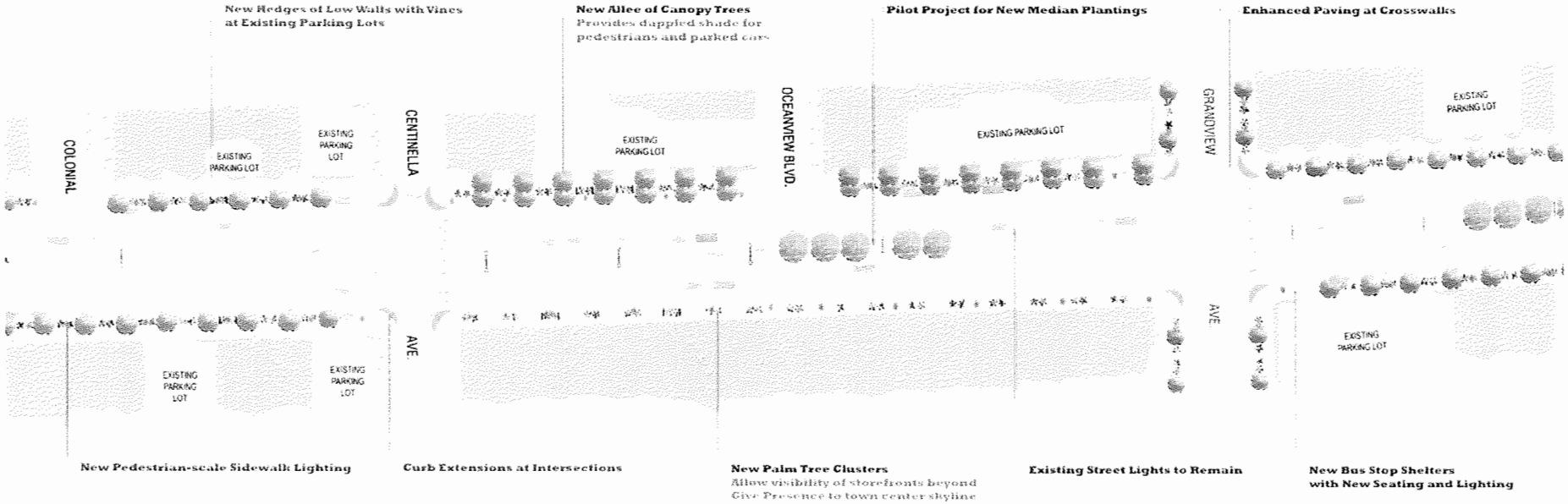
11 *New Gateways*
Emphasize significant intersections along the boulevard
Create opportunity for public art or specimen tree plantings

12 *New Hedges or Low Walls with Vines at Existing Parking Lots*
Screen existing parking lots adjacent to Venice Boulevard
Provide additional areas for new plantings

13 *Lighter-colored Roadway Pavement*
Reduces urban heat island effect

14 *Pocket Park at Venice Boulevard and McLaughlin*
Provides potential pet-friendly open space


Goals
Process



Town Center

VENICE BLVD

MAR VISTA TOWN CENTER

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JANUARY 24, 2008

EXISTING STREETSCAPE OF MAR VISTA TOWN CENTER

PROPOSED STREETSCAPE OF MAR VISTA TOWN CENTER at Grand View Avenue and Venice Boulevard creates a friendlier pedestrian environment with pedestrian-scale lighting, palm trees and colorful shrubs.

EXISTING STREETSCAPE OF RESIDENTIAL DISTRICT

PROPOSED STREETSCAPE OF RESIDENTIAL DISTRICT along Venice Boulevard near Walgrove Avenue creates a more vibrant district with new median plantings, sidewalk shade trees, pedestrian-scale lighting and benches.

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FUTURE VISIONS ALONG THE BOULEVARD

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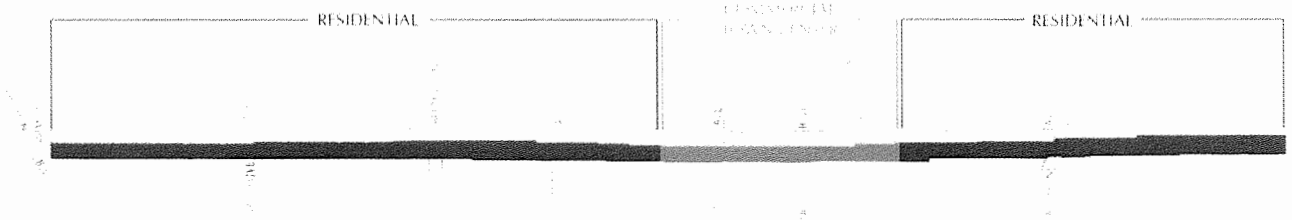
EXISTING SIDEWALK TREES ALONG VENICE BOULEVARD

PROPOSED TOWN CENTER TREE
Phoenix dactylifera, Phoenix Palm

PROPSED RESIDENTIAL TREE - OPTION 1
Cedrus deodara, Deodar Cedar

PROPOSED RESIDENTIAL TREE - OPTION 2
Platanus racemosa, California Sycamore

PROPOSED RESIDENTIAL TREE - OPTION 3
Pinus torreyana, Torrey Pine



TWO DISTRICTS ALONG VENICE BOULEVARD exist in Mar Vista where the residential communities flank the commercial town center district. The two types of districts will be planted with a unique sidewalk tree as shown above. This scheme celebrates and strengthens the identity of the commercial and residential districts. At the town center, new sidewalk plantings of palm tree clusters will allow visibility of the storefronts beyond while giving presence to the skyline above. In the residential areas, new sidewalk plantings of canopy trees will provide dappled shade for pedestrians and parked cars.

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SIDEWALK TREE PLANTINGS

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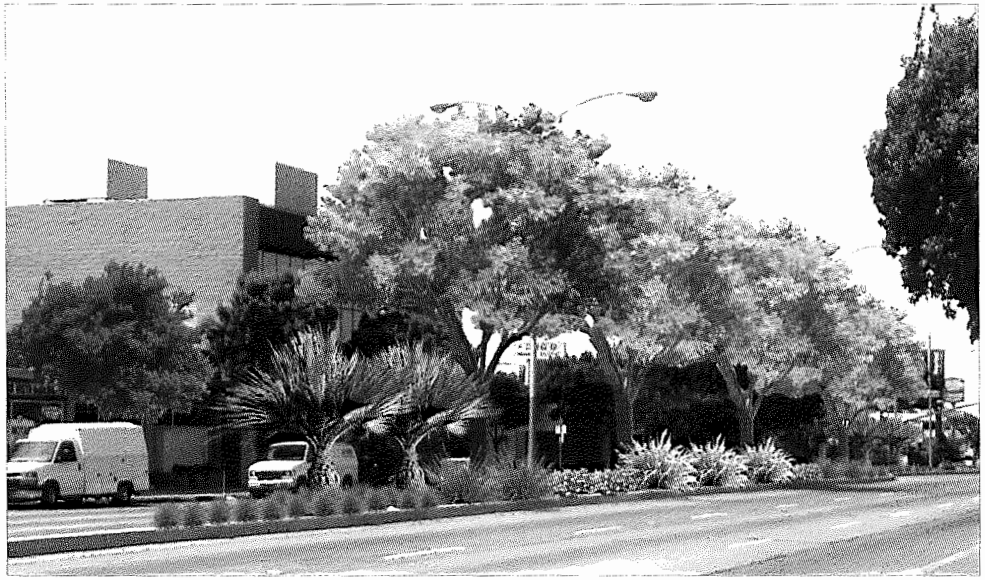
PROPOSED MEDIAN PLANTING WITH SPATHODEA CAMPANULATA CANOPY TREES

EXISTING MEDIAN PLANTING ALONG VENICE BOULEVARD



PROPOSED MEDIAN PLANTING WITH TIPUANA TIPU CANOPY TREES

PROPOSED MEDIAN PLANTINGS ALONG VENICE BOULEVARD will replace existing areas of concrete median with new canopy trees, shrubs and groudcovers. These plantings will create a street that looks cared for and well-maintained. Not only will the new plantings increase the total number of trees along Venice Boulevard, but they will minimize glare and eye strain from on-coming traffic for drivers.

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MEDIAN PLANTINGS

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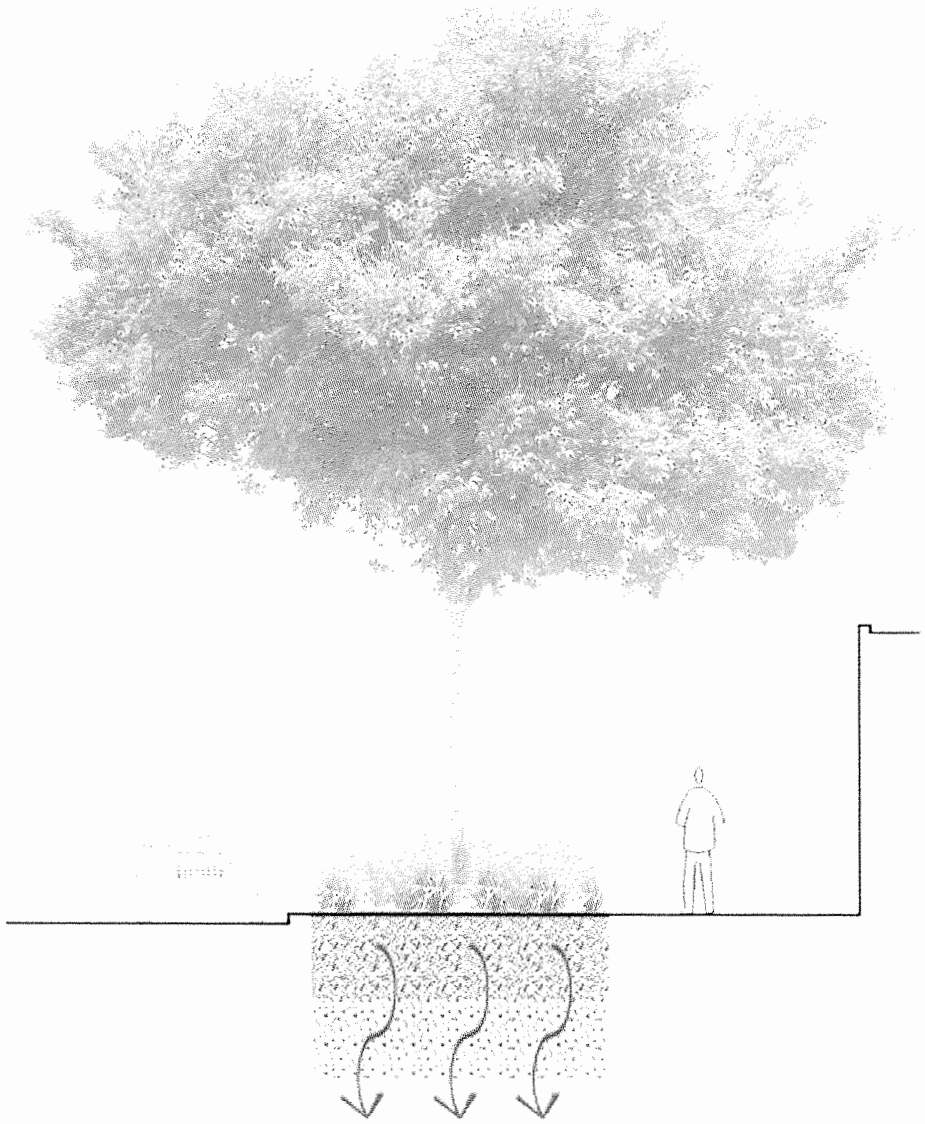

PROPOSED STORMWATER PARKWAYS will reduce and clean stormwater runoff that percolates down through the layers of soil and gravel in the planting bed.

EXISTING SIDEWALK along Venice Boulevard with its vast expanse of concrete sidewalk paving

PROPOSED STORMWATER PARKWAYS replace existing areas of paving to create a more vibrant setting along Venice Boulevard. In more commercial areas along Venice Boulevard, porous paving will be used instead of planting beds to further reduce stormwater runoff. Reengineering the soil will assist drainage as well.

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STORMWATER PARKWAYS

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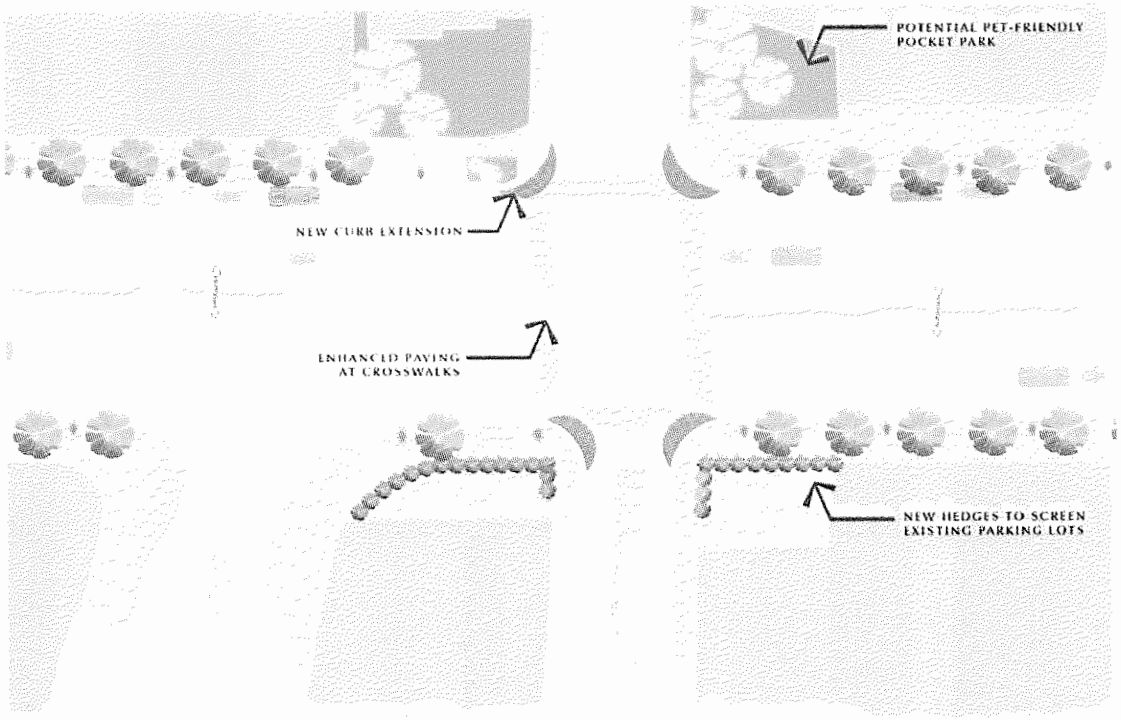
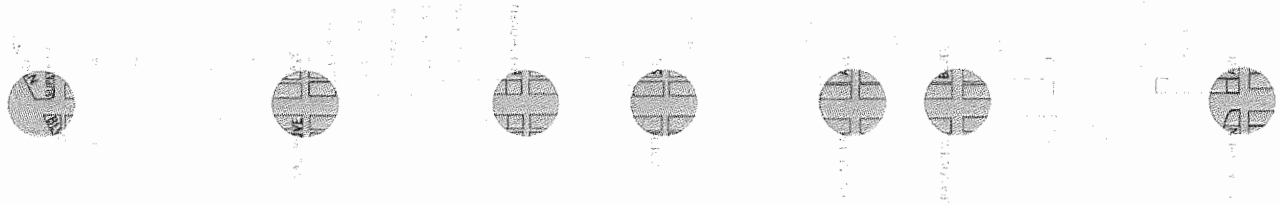
CORNER CURB EXTENSIONS extend the curb and pedestrian ramp further into the roadway and allow greater visibility for crossing pedestrians. As shown above, they create an opportunity for planting.



PROPOSED CORNER CURB EXTENSIONS along Venice Boulevard create a safer crossing for pedestrians by reducing the length of the crosswalk. Enhanced crosswalk paving at these intersections clearly mark the major pedestrian circulation paths.



PROPOSED CORNER CURB EXTENSIONS that occur at intersections of higher foot traffic will create a more pedestrian-friendly environment along Venice Boulevard. The intersections highlighted above indicate the proposed corner curb extensions.

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CORNER CURB EXTENSIONS

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JANUARY 24, 2006

EXISTING BIKE LANES on Venice Boulevard are currently located at the same level as the roadway between parked cars and three lanes of moving vehicular traffic. The doors of parked vehicles open into the bicycle lane. Bicycle riders also have an unpleasant proximity to moving traffic.

PROPOSED SIDEWALK BIKE LANES along Venice Boulevard are safer since they separate bicycle riders completely from both vehicular traffic and pedestrians. By slightly reducing the width of each driving lane, the width of the sidewalk can be increased to allow space for a bike lane. The sidewalk bike lanes are further separated from pedestrians and cars with plantings.

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BIKE LANE CONCEPTS

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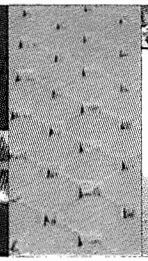
Pedestrian Lighting

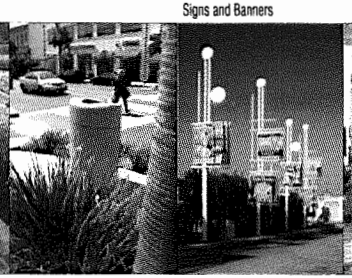
Solar Lighting

Permeable Pavement

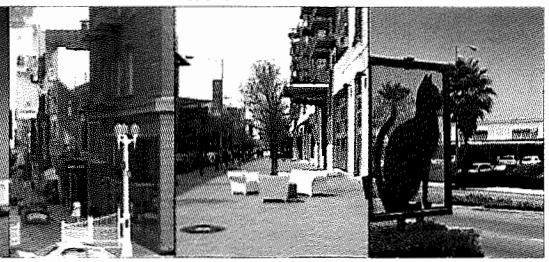


Trash Receptacles

Signs and Banners



Public Art



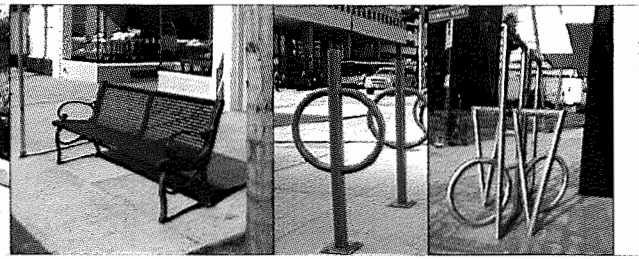
Median Trees
Continuous though all zones

tipuana tipu
tipu tree

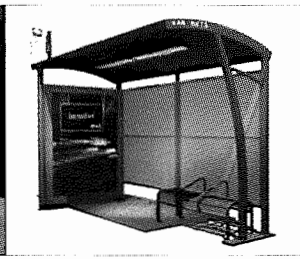
spathodea campanulata
african tulip tree

Benches

Bike Racks

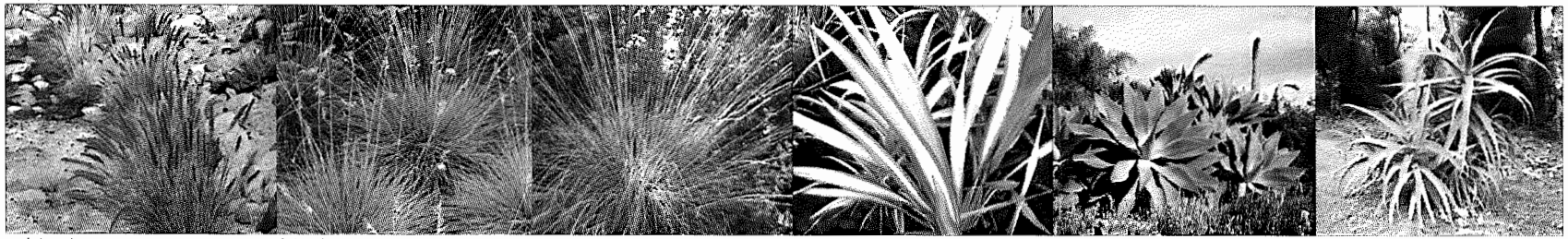


Bus Shelters



Dog Bag Stations

Shrubs, Grasses and Succulents



pennisetum setaceum
fountain grass

festuca glauca
blue fescue

muhlenbergia rigens
deergrass

phormium 'yellow wave'
flax

agave attenuata
fox tail agave

aloe vera
medicinal aloe

Drought Tolerant Shrubs and Groundcovers

salvia leucantha
mexican bush sage

lantana camera
gold lantana

senecio douglasii
creek senecio

rosemarinus officinalis 'prostratus'
rosemary

ceanothus 'yankee point'
wild lilac

myoporum parvifolium
creeping myoporum

dietes bicolour
bi-colored lily

VENICE BLVD

DESIGN PALETTE

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JANUARY 24, 2008

Cost Estimate

Item	Unit Cost	Sub-item Cost	Subtotal
1 Sidewalk Improvements			$1,666,000
Benches every 40′ (450 total)	$3,000	$1,350,000	
Trash Receptacles every 150′ (120 total)	$2,300	$276,000	
Bike Racks every 500′ (40 total)	$500	$20,000	
Pet-friendly Waste Stations every 500′ (40 total)	$500	$20,000	
Public Art*			
Enhanced Pavement*			
2 New Sidewalk Trees			$1,800,000
Shade Trees, 36″ Box, 12′ at Installation (520 total)	$2,500	$1,300,000	
Palm Trees, 12′ Brown Trunk (250 total)	$2,000	$500,000	
3 New Stormwater Parkways			$2,048,000
Stormwater Parkway Plantings (128,000 s.f.)	$8	$1,024,000	
Allowance for Excavation and Replacement of Existing Soil (128,000 s.f.)	$8	$1,024,000	
4 Sidewalk Bike Lanes*			NIC
5 New Pedestrian-Scale Lighting			$1,550,000
Light Fixtures every 60′ (310 total)	$5,000	$1,550,000	
6 New Bus Shelters			$484,000
Bus Shelters (22 total)	$22,000	$484,000	
Bus Shelter Planting			
7 Curb Extensions at Intersection			$450,000
Curb Bulbouts at 4 corners of 9 Intersections (36 total)	$12,500	$450,000	

Cost Estimate (cont'd)

Item	Unit Cost	Sub-item Cost	Subtotal
8 Enhanced Paving at Crosswalks			$1,850,000
Crosswalks w/ Interlocking Pavers at 9 Intersections and 1 Mid-Block (37 total)	$50,000	$1,850,000	
Deduct. Alt. - Crosswalks w/ Stamped Asphalt at 9 Intersections and 1 Mid-Block (37 total)	$25,000	$925,000	
9 New Median Plantings			$1,735,000
Shade Trees, 36" Box, 12' at Installation (200 total)	$2,500	$500,000	
Shrubs and Groundcovers (95,000 s.f.)	$10	$950,000	
Irrigation (95,000 s.f.)	$3	$285,000	
10 New Signs and Banners*			NIC
11 New Gateways*			NIC
12 New Hedges or Low Walls w/ Vines at Existing Parking Lots			$550,000
Low Walls w/ Vines (2,200 l.f.)	$250	$550,000	
Deduct. Alt. - Hedge Plantings (2,200 l.f.)	$75	$165,000	
13 Lighter Colored Roadway Pavement			NIC
14 Pocket Park at Venice Boulevard and McLaughlin			$77,500
Shade Trees, 36" Box, 12' at Installation (5 total)	$2,500	$12,500	
Benches (10 total)	$3,000	$30,000	
Shrubs and Groundcover (7,000 s.f.)	$5	$35,000	
Grand Total			**$12,210,500***

*Cost Estimate Grand Total does not include the cost for public art, enhanced pavement, sidewalk bike lanes, gateways, lighter colored roadway pavement, roadway striping, site utilities, site demolition, site preparation, soil, irrigation and construction unless otherwise noted.

References

- Electric Railway Historical Association of Southern California
  www.erha.org

- Mar Vista Community Council
  www.marvistacc.org

- Mar Vista Historical Society
  www.marvistahistoricalsociety.net

Acknowledgements

This booklet was prepared by Katherine Spitz Associates, Inc. Landscape Architecture for the Mar Vista community. We look forward to Venice Boulevard becoming a more lively, friendly center for Mar Vista. We thank the many community members who have given their time and consideration to the project over the last 6 years.

Comments on the Westside Mobility Plan

Regarding the CTCSP and WLA TIMP June 18, 2014

By Phillip Jon Brown, Architect

The Big Picture

Don't get me wrong. I believe that greater LA needs a greatly improved system of BRT and that it can help re-invent LA. But BRT can be designed with flaws and misplaced objectives that can undermine its benefits. I think that is the case with this particular version of BRT as proposed in the Mobility Plan. The incompatibility with regular boulevards is probably due to the central positioning of the BRT as an anticipation of light rail at some future date to replace the BRT. The central BRT and a future light rail facility would impact the adjacent communities and neighborhoods and subordinate their mobility to those destinations that would overly concentrate with development such as in the Lincoln Boulevard corridor to the City of Santa Monica.

In general rail transit imposed on the boulevards of the legacy surface system of Southern California and its spatial distribution of land use make rail incompatible in such relationships. Rail because of this incompatibility is best in its own right of way. However the problem with that is there are only rare instances in the built urban setting that a separate right of way is affordable or vacant and available. Therefore rail is not the answer for extensive infrastructure and land use improvement in LA County. An approach that is more integral with the surface system of roadway and their evolving form would be more appropriate for Westside improved mobility.

Rail is also fighting the evolving technology that will bring greater efficiencies to vehicular modes which includes BRT done right and more appropriate relationships to existing settlement as well. The further evolving of communication technologies also reduces the need and desirability for excessive population concentrations for work places. So to make impacts on communities and their infrastructure in order to overly concentrate development is definitely not called for. In addition there are superior technologies than rail that are evolving which "are compatible" with existing Southern California lifestyle and trends. They also respond to those that seek greater independence and freedom in relation to performing business. More independence and changing collaborations, close to home work centers, home centered businesses and the dislike to be working in a "cubicle farm" are examples of trends.

The Great Recession has had a major effect on all social and economic matters including why and how plans should be made for the near and medium future. Imbalances have occurred and now suburbs need to be denser, more productive and more self sufficient. Whereas an area such as the Westside needs to be kept from over development in order to retain the livable qualities that it has attained. Following that reasoning the Westside transportation improvement should respect those objectives and the will of the people that now reside there. Specifically there should not be transportation improvement that will bring more regional trips to the Westside and induce the regional trip attracting development that responds to that increased kind of rail access which will also attract all forms of traffic because of the increased development. The Westside needs to be more self sufficient with short trips to connect

activities and land uses, emphasize residential rather than regional commercial development, take advantage of new transportation and communication technologies and also promote walking and biking to make short trips.

Policies Questioned

First, instead of having much more development in order to assess fees on to pay for expensive mitigation for increasing transportation problems, which happens to be a result of excessive development, simply reduce development to only that which does not bring in additional trips from outside of West LA.

Secondly, control the traffic that is currently active in the Westside with a low cost transportation strategy which can use the new technologies now evolving in the relationships, of and between vehicular and roadway innovations. By following these two policies and making the Westside more self sufficient by utilizing short trips that reduce the travel demand growth that would come with regional land uses, congestion can be solved as a problem on the Westside.

This concept is tied to the many areas of Greater Los Angeles to become more self sufficient and thereby reduce VMT and emissions as well. This by the way is the most effective way to reduce GHG emissions. Los Angeles will inevitably increase in population. This applies to the S F Valley and to the South Bay in particular regarding not making a big increase in trips to the Westside. Making excessive land use growth that attracts even more trips to the Westside should be curtailed. Job creation and developers must start providing the dispersal of work place, shopping and community development in general to help all of Los Angeles County benefit by efficient community function which reduces trip length and GHG emissions. Community plans should be made that improve livability for all LA residents and specifically in terms of this Mobility Plan avoids conditions where developers are eager to pile on the fashionable Westside area for personal economic gain while impacting Westside livability.

Two Major Westside Corridors to Improve and They Have Two Different Sets of Needs

The Lincoln Corridor should not provide so much commuter travel to Santa Monica that it impacts the mobility for the adjacent residential communities along the corridor and that would support over development in the City of Santa Monica. That is what the present approach intends by putting BRT in the center of Lincoln, and light rail later. It is excessive that the intension by this centrally located transit approach is to over develop Santa Monica by later converting that space to surface light rail for excessive development in Santa Monica. All the more egregious is that the design does not work and would impact the adjacent residential neighborhoods adjacent to the Lincoln Corridor. Details on these relationships are made further below.

The Sepulveda Corridor which includes the transportation problems of the 405 is quite a bigger transportation problem that should be acknowledged. Reaching a balance between the capacity of transportation infrastructure and land use development is necessary. Here the intensity of traffic attracted to the Westside and the inadequate

405 capacity as well as the ramping to distribute and collect traffic creates an extreme "bottleneck like" congestion affecting both the 405 and the Westside arterials which connect to it. An improved Sepulveda Corridor would be instrumental in eliminating that bottleneck condition by means of a Flow Boulevard with BRT to be used as a frontage road (as defined and with examples given on the website at www.FlowBoulevardPlan.com in the posting entitled Flow Boulevard Planning in Los Angeles). This happens to be part of the emerging technology that can address both of those 405 congestion issues in that corridor. The Flow Boulevard recommendation to solve the 405 and the entire congestion problem connected with it is discussed at the end of this comment statement. There is also a source and budget for that work.

Specific Traffic Operational Problems With the Mobility Plan Design

Before going to the comments on the overall corridors below; comments on the problems that the centrally located BRT as proposed in the Mobility Plan will be discussed. The central street position of the BRT lanes would have a number of operational problems regarding safety, impaired capacity, turning movements and there would be impacts to the mobility and operations of the traffic in the adjacent residential communities along the Lincoln and Sepulveda corridors.

Safety:

The center of the boulevard location for the bus rider platforms to use for waiting to board or depart from the buses presents an obvious vulnerability to transit riders. The buses are on either side of the centered platform where local and BRT buses pass by in close proximity. People waiting for their particular bus will be in the greatest danger as BRT and local busses are passing by at rather fast speeds. And we all know what happens when going under a bus.

With the proposed mid block platform locations this means there would be even more traffic signals for pedestrian walks out into the street to the waiting areas in addition to those locations of crosswalks at signaled street intersections. But the bus waiting areas have buses passing at great speed whereas the crosswalks at signaled intersection do not. So there is additional exposure to bus riders to unsafe vehicular traffic to reach the platform area as well as while waiting there which in the early BRT phase may only be defined by paint on the pavement.

Incidentally the additional pedestrian cross walks and stop lights will reduce the capacity of the bus lanes and the vehicular lanes that are arranged near the street curbs on either side of the BRT lanes. Less capacity means slower traffic and is an impact of reduced mobility for the adjacent residential areas as well. Due to the limit of street right of way width an entire side of parking would be removed from the boulevard. This puts fast moving cars next to the curb on one side of the boulevard which again would be in close proximity to pedestrians on that sidewalk in that there is no barrier of parked vehicles or extra separation.

Exposure of pedestrians to traffic is one area where there is a lack of safety. In the paragraphs below the difficulty of turning movements and the general operation of traffic has a major effect of lowering the safety of traffic as drivers seek to find ways to reach their destinations.

Vehicular Turning Movements are Restricted or Eliminated Onto and Off Of the Boulevard:

Difficulty of making turning movements occurs especially if there may be a raised center platform but also just generally in that there is no median area for a vehicle to conveniently wait to make a left turn off the boulevard or receive such a turn from a side street. If there were occasional medians between waiting areas they would be in very complicated mixed traffic conditions and three lanes of traffic to cross. As it was explained to me there would only be opportunities to cross the boulevard at signalized intersections and there would not be any sort of left turns to be made from side streets on to or off of the boulevard. The only left turn opportunities would be at cross streets with signals on the boulevard. This means that left turns across the lanes of the BRT separation to businesses that occur along the boulevard would be eliminated. This is a very big impact to local businesses and mobility in general.

It should be noted that not being able to make left turns on or off the boulevard is an obvious shortcoming. Left turns have been excluded however in that they would present traffic operation difficulties that would impair the operation of the BRT transit and greatly impact the rail transit. Two difficulties are it would be tricky to weave left turn pockets in between transit lanes or to zigzag the transit lanes as similar to the miss alignment problems for rail that would exist at signaled street crossings explained below. Weaving in left turn areas among the zigzagging of BRT or Rail lines becomes a considerable complication to both the vehicular driver and the transit alignment with central platform areas. Off peak low traffic conditions with slow speeds might allow some of those turns to be made but during peak hour high traffic conditions the operations would fail. That is why the proposal excludes left turns on or off the boulevard except at the signaled intersections. But you will see that does not work either.

It is also interesting to note that the left turn pockets at cross streets are in effect protected from moving traffic to make left turns while boulevard traffic is stopped with a red light. If there where left turn pockets in between signaled cross streets or between waiting areas those left turns would not be protected by stop lights and both moving vehicles and buses or eventually rail would present unprotected dangerous turning conditions. And the BRT or rail transit would be swinging back and forth between left turn pockets and centrally located rider waiting areas in a zigzag movement down the boulevard.

To continue with analysis of the Mobility Plan proposed design we find; by only being able to make left turns at vehicular cross streets with signals which are usually one half mile or could be a full mile apart, that creates a major inconvenience and reduces mobility. That condition would cut off local mobility not only to businesses but also there would be additional traffic through the adjacent neighborhoods, probably going bump-pity bump over the traffic humps until an arterial or local connector with a signal is

reached so that a turn can be made to approach the boulevard so that a left turn can be made at the signal.

Left turn pockets on the boulevard at signaled cross streets would be made more complicated and probably twice as long in length and signal time in that now there would be an increased number of left turns at the signaled location because of the restrictions of not allowing left turns between signaled cross streets. The left turn pockets would require the BRT or Rail lanes to swing together to make room for the left turn pockets at cross street intersections. The BRT or rail lines would be swinging back and forth as they move down the boulevard. All this impacts capacity for the boulevard transit and vehicular traffic as well.

The last tricky positioning of BRT lanes or rail track is at the cross street intersection where the left turn pockets for the south bound traffic and the north bound left turn pockets can not line up across the intersection because they are approached in separated opposing lanes and turn in opposite directions. This would require BRT or rail to make a radically sharp 13 foot realignment, if going south for example, to move from the left side of the central position to the right side of the central position in the distance of the width of cross street which would be likely 80 feet for a cross street arterial. A sharp curve of that sort would require the BRT bus to greatly slow down but for rail it is likely not possible to safely realign in that short of a distance. That would imply that for either north bound or south bound traffic there could not be a left turn pocket because rail could not realign in such a short distance. It is now coming to light that not enough left turns can be made to serve normal travel demand because of the central positioning of the BRT or rail location. The more one analyzes the central position of the transit way the more one realizes that the impact on local mobility is not acceptable. The system simply does not work.

The centrally located BRT instead of a median certainly impacts and makes reduced mobility for the areas adjacent in this kind of configuration of traffic elements. In the event that the BRT facility is turned into a light rail facility there would be even greater reason to not have left turn crossings due to supposed higher speeds by rail and that would permanently impact adjacent area mobility. In terms of only having a central rail facility to favor commuters it would mean local bus transit would probably be returned to the vehicular lanes. In that circumstance with no bus pockets that would impair traffic flow and reduce capacity. This generally again points out the incompatibility of putting rail mixed in with vehicular traffic in a street with limited width.

<u>Complicated Relationships of Pedestrians, Vehicles and BRT Makes a Loss of Capacity</u>

The complicated relationships as noted above means that the additional pedestrian signals to the central BRT waiting areas, the longer signal periods at cross streets, conflicts between BRT and local buses and the additional problems of circulating local traffic to get to local businesses or to make left turns now makes for greater delays to stop and go traffic movement. This can lead to traffic failure to the BRT and the vehicular lanes during peak travel periods with a proverbial five mile per hour traffic. The extra signals for the crosswalks to waiting areas also eliminates the ability to synchronize signals in that signals closer than almost one mile apart cannot be

synchronized for traffic in both directions. BRT and light rail would be caught up in this quagmire as well and lose capacity since both must respect the signalization at the signalized cross streets.

The Mobility Plan design provides 36 feet of width for the central BRT lanes. There would be two lanes at 13 feet for the buses (or rail) and an additional 10 feet in width for the waiting area between them. In a street with a limit of 100 feet in right of way this in effect is a down grade to the vehicular flowing lanes and the side walk widths. Sidewalks at 8 foot in width would be substandard for a boulevard. Take another 8 feet for parking on one side of the boulevard and that leaves 40 feet to be divided among four lanes of vehicular traffic. Ten foot wide lanes would also be substandard and dangerous in that flowing vehicles would be in close proximity to a curb where pedestrians circulate on one side of the street and next to people getting in and out of parked cars on the other side of the street. This slows down vehicular movement as well. Some might say that slowing down vehicles is all right, but it should not be done on account of a design for transit that impacts the adjacent community and impairs safety and mobility.

With local and BRT buses in the same exclusive central lanes in the Mobility plan design, and not having the ability to pass one another, this means that you no longer have fast BRT. BRT would be as fast as the local buses. Doing away with local bus service is an option but that would be a disservice to the adjacent community. Allowing the BRT buses to swing out of the exclusive lanes to pass local buses might work in light traffic periods but would not work in peak periods when there are vehicles packed end to end. So just when you need BRT to take commuting ridership the system collapses with a great loss of capacity and speed. BRT needs to be fast and dependable to attract ridership in order to be successful. That is not the case with this centrally located BRT design.

Don't Use Centrally Positioned BRT or Lose the Central Median for Turning Movements

This reasoning has local, large scale and long term justification. Southern California should not plan for a make-over of Greater Los Angeles with an extensive light and heavy rail network which supports large concentrations of work populations in a few locations. That is because in most instances as the above analysis provides; it does not work.

To force the rail transit issue would lead to major impacts to land use development and dislocations of existing transportation infrastructure and in the long term make further socio- economic costs and a bifurcated society. Instead an evolved improvement and refinement of our legacy surface transportation system should have the major emphasis by using the emerging vehicular technologies for vehicles and roadways and yes BRT correctly positioned at the right hand side of the roadway. The better path at the large scale instead of overly concentrating development is to secure more independent dispersed large, medium and small cities where reduced VMT is achieved by the reduction of the average trip length with more self sufficient community forms being developed. And by improving the function of both mobility and community livability by

respecting, evolving and innovating the relationships between transportation and land use better cities and communities can be made.

Sepulveda Corridor: Solving the Existing and Future Westside Congestion

Whereas most of the above analysis and recommendations apply easily to the Lincoln Boulevard corridor, the Sepulveda corridor is more complex and presently is a bigger congested area. In the Sepulveda corridor there is involvement with the 405 freeway whose capacity has been exceeded putting extra travel demand traffic pressures on Sepulveda Boulevard and related cross streets and even entire communities. The freeway congestion entangles the distribution and collection of the 405 commuters to the Westside which results in extreme congestion and the long peak hour periods of four, five or more hours. Actually the entire Westside arterial grid becomes over loaded and congested in parts because of these conditions. There is also extreme cut-through traffic with an example of which is the 28 thousand trips per day circulating through Brentwood resulting from the commute between the Valley and the City of Santa Monica. The freeway corridors are presently so congested commuters get off the freeways and find cutting through communities and neighborhoods faster than the freeway travel. This is the basic transportation problem of the Westside. The freeway corridors are failing to take commuters to their destinations. The Expo line will help with the east-west movements but not the much larger north- south travel demand into Westside and in turn the City of Santa Monica.

By the completion of adding the north bound high occupancy lane to the 405 and other ramping alterations there is some lessening of 405 congestion. This is partially due to the fact that there is less travel demand now than in 2006 before the Great Recession occurred. This lull in travel demand is at best temporary. Therefore it is important to now plan to address an overall and longer term solution to the Westside Transportation problem.

SOLUTION: Whereas the overall Westside 405 traffic solution is multi-modal the key improvement is in using a Flow Boulevard in a one-way pair configuration as a frontage road to the 405. The one-way pair would straddle the 405 freeway bringing additional capacity to alleviate the congestion of both the north-south capacity deficiency and the connections to the east-west arterials serving the Westside as well as help make a better congestion free connection to the I- 10 to Santa Monica.

The Sepulveda Flow Boulevard would occur for just the four and one half miles from south of Sunset to Culver City in order to relieve the existing giant freeway caused bottleneck. The FB solves the deficiency by adding the needed new increased capacity to relieve the bottleneck in the north and south directions, would be designed for 45 mph travel speed and would double the turning movement capacities from north-south to east-west allowing the Westside arterial network to no longer get congested at the intersections and ramps to the 405.

By just improving the four and one half miles and not reaching into the Valley or South Bay the improvement would not attract a great deal more of trips to the Westside.

The intent is to focus on fixing what is now broken not adding to the traffic problems on the Westside by facilitating more commuters from great distances. There would be however some increases in trips due to latent demand and some growth but that would be taken care of by increased use of BRT and later by improved vehicular technologies.

The Sepulveda Flow Boulevard is mainly comprised of the pairing of Sepulveda and Sawtelle Boulevards in a one-way synchronized signalization configuration and would have exclusive BRT lanes. North of Olympic Beloit would be used to pair with Sepulveda instead of Sawtelle. The BRT lanes would be on the right side of the Boulevards so that the BRT buses would be able to begin and end routes on regular boulevards that pick-up and disperse passengers from curb sites at the right hand side of the streets. These routes can begin in lower density suburban areas and end in destinations such as Westwood, Century City, Santa Monica and the various Boulevards of the Westside. The Mobility Plan BRT buses where there would be left side pick up and dispersal of passengers from the centrally located street platforms would not be able to do that.

Not to be overlooked as part of the Westside multi-modal traffic solution is the $1.2 Billion dollar addition of the one north bound HOV lane to the 405. That however will add capacity of only about an additional 25,000 person trips/day leaving a corridor deficiency of 75,000 pt north-south which will continue to make congestion along the corridor if not alleviated. Also travel demand to the Westside generally will be helped with the Expo Line once completed but that does not help solve the north-south deficiency. The Expo additional capacity east-west would only be about 25,000 pt/day on a cordon line count into the City of Santa Monica. What is also needed would be a capacity improvement of the I-10 freeway between the 405 interchange and the City of Santa Monica which could also be taking passengers from the S F Valley and South Bay to Santa Monica. By these capacity improvements the Westside congestion would essentially be fixed by providing the high capacity corridors of the 405 (which includes the Flow Boulevard) and the I-10 (which benefits by an additional lane in each direction and the Expo Line) to take travel demand through and around the Westside without making congestion within the Westside arterial grid or cutting through Brentwood. The key improvement however is the Sepulveda Flow Boulevard which provides the needed new increased capacity in the north-south direction as well as being involved with connecting traffic with the I-10.

Not a Solution: The intended improvement that the Mobility Plan proposes is insufficient. Considering its design flaws it would be lucky to add 5 to 10 thousand person trips per day with BRT and maybe 10 to 15 thousand if converted to rail in Sepulveda Boulevard. Both of these increases are insufficient to solve the north-south travel demand deficiency in the 405 corridor which includes Sepulveda Boulevard. The proposal impact adjacent communities and also suffers from the inability to deliver passengers directly to the dispersed destinations of the Westside because of the wrong sided access buses and the inability of rail to disperse passengers into the surrounding destinations.

One more needed corridor improvement: Another corridor which is involved with the 405 present traffic difficulties is the Santa Monica Boulevard corridor that connects the 405 and West LA to Century City. Because of its high volume of traffic that corridor must be considered in making a solution to the 405 corridor traffic problem. Santa Monica Boulevard which is almost a Flow Boulevard now could receive the few needed improvements to become a Flow Boulevard with traffic that flows and does not stop at signals.

Furthermore an interchange at grade can be devised to connect a Santa Monica Flow Boulevard with a Sepulveda Flow Boulevard, again without traffic having to stop at signals. The system would be designed for travel for 30 mph in the Santa Monica Flow Boulevard and 45 mph on the Sepulveda Flow Boulevard, meaning a 5 mile trip might take about 8 minutes. This would solve a major high volume transition of 405 corridor traffic between Century City and the 405 corridor. Since that travel demand is so great and presently creates such traffic snarls and congestion it should be part of a Westside Plan to improve mobility.

Where does the money to fix the Westside traffic problems come from?

Rather than prepare to make ordinances, as does the Mobility Plan, in order to collect many more mitigation fees from developers to mitigate the transportation problems resulting from excessive development, development plans should be scaled back and development fees should be studied for more appropriate allocations. There are probably many street, sidewalk and other public works projects where the money can be effectively spent to improve communities in the Westside. But essentially reduce the amount of Westside development and need for fees in the name of retaining livability.

As far as where the bulk of the money for Mobility improvement projects could come from the one Billion dollars of Measure R moneys that have been allocated for the now Metro "undetermined connection" between Westwood and the Valley. Metro has assumed that regional rail is the answer. But it would be a mistake to put a questionable connection to the Valley above the all too evident traffic problems of the Westside. Scaling back the amount of Westside growth would mean that large transit projects would not be necessary. Conversely fixing the congestion that now exists on the Westside should be the priority for a Westside Mobility Plan and it can be done economically.

Metro's charge is to make a regional system of transportation over the long term. The community and multi-community transportation problems which the Westside has are not Metro's main charge. Metro has to be asked to participate in transportation problem solving at the community scale through the "Call for Projects" program in order to engage. So Metro tends to overlook community scaled problems unless called upon. But since a billion dollar outlay for a subway (which would be more like $6 billion) or other major mode improvement to the Valley would not ultimately help the travel and living conditions of LA and the Westside in the short and medium length periods, Metro should be called upon to make the Westside traffic problem a priority and it should also

redirect those Measure R funds to pay for the necessary transportation improvements to actually solve the transportation problems of the Westside.

The existing Measure R project list leaves a gap where there are no project funds allocated from about Wilshire to LAX. That is the area that we are now discussing that needs solutions to traffic and development problems and the money to pay for them. Major connections to the Valley which may bring more development to the Westside along with additional travel demand would not help in solving the existing Westside traffic problems. So citizens and their representative should re-prioritize projects and expenditures to fix these major outstanding Westside problems now. The idea of raising more money on the premise of increased development is objectionable from socio-economic, environmental and livability criteria.

The premise of concentrated development instead of dispersed development will be a necessary debate to reform and redefine the long term transportation plans for LA County for Metro to carry out. So the following plan is advanced to solve the entire Westside transportation problems now and pay for it with the Measure R one billion dollars already funded by the sales tax that has been passed.

An Brief List of Projects for a New Westside Mobility Plan

A Westside plan to eliminate congestion would be comprised of the connected Sepulveda and Santa Monica Flow Boulevards and their improvements to the connections to the 405 and I- 10 freeways. Not mentioned thus far would be making the existing "break-down" lanes to the side of the primary I-10 freeway lanes actual freeway lanes that improve access to the City of Santa Monica. With these elements the major corridors would be able to receive and control commuting traffic to and from the Westside without overloading the Westside arterials and having residential cut-through traffic such as in Brentwood to the City of Santa Monica.

Improvement could be started with the segment mainly dealing with the Westside congestion problem by adding the Sepulveda Flow Boulevard as a frontage road to the 405 freeway from south of Sunset Boulevard to Culver Boulevard in Culver City. It would be the key element in the multi-modal elimination of congestion for the Westside. As far as improving some 405 capacity over the medium term it would be logical to make the San Fernando Valley to the West LA area transit connection with a fleet of super freeway capable buses to take the Sepulveda grade and respond to a growing travel demand.

In any event the break down in costs for the objective of 1/ eliminating Westside congestion problems, 2/ using BRT for improvement to the Flow Boulevards and as an improved transit connection to the Valley and South Bay, 3/ eliminating the failing traffic in both the Santa Monica and Sepulveda Boulevard corridors and 4/ getting a good balance between infrastructure and community development by using Flow Boulevards is set forth below.

Costs

The one billion dollars that has been designated in the Measure R list of projects for a transit connection from Westwood to the SF Valley can be re-allocated to a much greater usefulness in the following manner.

Improvements:	# of Buses	$ in Millions
14 miles of Santa Monica and Sepulveda Corridor Flow Boulevards (buses included)	180	168
3 Grade Separations @ $40 million each	0	120
FB Interchange & road with Beloit extensions	0	160
405 additional super-buses for Westside commute	70	56
Rework of the 405-Wilshire intersection to use Sep/FB	0	40
Total Westside FB and BRT Transit Program	**250**	**544**
Convert I-10 paved area to 2 more lanes; 405 to SM City		250
Final Total for Westside congestion elimination		**794 Million**

$1 Billion less 794 million (congestion eliminated) = 206 million left over (surplus)
A Flow Boulevard could be made in the Lincoln Corridor but is not recommended in that it would contribute to over developing the City of Santa Monica.

A more reasonable improvement to the Lincoln corridor is to simply add BRT buses and improve the normal right side of the street curb bus pocket locations with improved boarding and exiting. Also provide improved priority for buses to move back into the flowing lane without much delay in heavy traffic.

Admittedly this is a brief outline on solving the Westside transportation and livability problems. However it has the right approach and elements of transportation improvements. Therefore it deserves to be taken on as the way to effectively eliminate congestion on the Westside. We have to start solving problems in Los Angeles, not go on making more problems for ourselves.

Phillip Jon Brown, Architect
1864 Benedict Canyon Drive
Beverly Hills CA, 90210
www.philbrown44@roadrunner.com

Written Comments

for the

Coastal Transportation Corridor and West Los Angeles Transportation Improvement and Mitigation Plan (CTC/WLA TIMP)
Specific Plans Amendment Project EIR
Public Scoping Meeting

Thursday, June 5, 2014, 6:00 p.m. to 8:00 p.m.
Westside Pavilion Community Room B
10800 W. Pico Boulevard
Los Angeles, CA 90064

Monday, June 9, 2014, 6:00 p.m. to 8:00 p.m.
Venice High School
13000 Venice Boulevard
Los Angeles, CA 90066

Name: PAMELA DAY
Organization (optional):
Address: 3811 Lyceum Ave.
Zip Code: 90066
Phone (optional): 310 405 0905
E-mail (optional): pamela@crimsonholdings

Comments:

While I support the proposed changes, as a junior economist I must tell you that the idea of imposing Trip Fees on new residential projects is illogical and unfounded. Those fees will only be passed on to the cost of already astronomical housing prices on the west side. Further, traffic on the west side is not caused by westside occupants. It's caused by commuters coming in and out of the west side for work. By easing the cost to build new housing, you will actually reduce traffic. By making it harder to develop & more expensive to build, you actually increase the number

(Please write on the back if you need more room)

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

Comments may also be submitted via email to westside2@fehrandpeers.com.
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OF people who cannot afford to live on the west side and, instead, drive here from other neighborhoods.

Please reconsider this short-sided view & imposing trip fees on new housing and instead find the funds for transit improvement in other coffers.

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Name: J. Ross
Organization (optional):
Address: 1721 Granville
Zip Code: LA 90025
Phone (optional): 310-979-9255
E-mail (optional): Ross_Jay@hotmail.com

Comments:

Extend Bundy/Centinela bus enhancements south to Playa Vista.

Keep bike lane on Bundy/Centinela for direct connection to Expo Station (as it is in City Bike Plan). Bike friendly on Barrington is poor substitute.

Remove all exemptions, especially for Multi-Family Resident, for Impact Fees.

Implement ATG fees that San Francisco uses (Flat fee for

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every trip generated, $ regardless of land use or source.

I would support removing car +/or parking lanes on Lincoln to install BRT or rail.

Keep rail stations at grade, don't make aerial stations + don't widen roadway under bridges.

Plz analyze economic losses from global warming, + geopolitical impact of wars related to securing cheap oil (or savings from <u>not</u> doing them).

I work for a developer – transportation impact fees have negligible impact on construction costs. Add them on, it will have no impact on sales price.

Good idea – add electric charging stations.

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Name: Tim Corcoran
Organization (optional): Arup
Address: 12777 West Jefferson Blvd
Zip Code: 90066
Phone (optional): 310 227 2559
E-mail (optional): tim.corcoran@arup.com

Comments:

- BUS PRIORITY ON WASHINGTON (GREEN BUS, ROUTE 1) + PROPER REAL TIME INFORMATION. TRANSIT COORDINATION AT CULVER CITY (EXPO | GREEN | BLUE | DOT BUSES — HUGH POTENTIAL RIDERSHIP FROM MDR
- BRT ON VENICE (BUT STREETCAR WOULD BE NICE) – STRONGLY SUPPORT
- CYCLE LANES SHOULD BE ON IMPORTANT (STRAIGHT) STREETS, NOT WANDERING THROUGH SIDE STREETS – EXAMPLES: ADMIRALTY, LINCOLN, WEST JEFFERSON
- STRONGLY SUPPORT BRT ON LINCOLN (LRT UNLIKELY TO BE SUITABLE BUT CONSIDER STREETCAR)
- SUGGEST "MEDIA" CAMPAIGN TO PROMOTE TRANSIT – NOT JUST FOR FOLK WITHOUT CARS – MODE SHIFT FROM CAR
- REPAIR SIDEWALKS TO MAKE THEM USABLE – EXAMPLE, WEST JEFFERSON NEAR HOME DEPOT

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Los Angeles, CA 90066

Name: Christopher McKinnon
Organization (optional):
Address: 11837 North Park Avenue
Zip Code: 90066
Phone (optional): 310-572-7929
E-mail (optional): local@afewgoodideas.com

Comments:

- include streetscape improvements with California native plants in the medians on Venice Blvd. in MAR VISTA 90066
- left hand turnsignals and pockets at every intersection in each plan
- yes to developer fees to R1 residential if the project increases the footprint square footage
- Solar lights for every transit shelter or stop
- Solar powered big belly trash compactors at every transit stop and business district

(Please write on the back if you need more room) over

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- build parking structure at Venice Blvd and Centinela
- do not remove vehicular E-W traffic lanes on Venice Blvd for use by metro rapid or metro-shuttles

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Venice High School
13000 Venice Boulevard
Los Angeles, CA 90066

Name: STEPHEN RESNICK

Organization (optional):

Address:

Zip Code:

Phone (optional):

E-mail (optional):

Comments:

PLEASE, NO BIKE LANES ON WESTWOOD BLVD.

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Los Angeles, CA 90066

Name: WOLFGANG VEITH
Organization (optional): NORTH WESTWOOD VILLAGE RES. ASSO.
Address: 476 LANDFAIR AVE.
Zip Code: LA 90024
Phone (optional): 310-208-6624
E-mail (optional): wolfgangveith@hotmail.com

Comments:

ABSOLUTELY NO BIKE LANES ON WESTWOOD BLVD. BETWEEN WILSHIRE BLVD. AND ~~GAYLEY~~ LE CONTE AVENUE. 3 BUS STOPS ON THIS SHORT SECTIONS ABOUT 15 BUS LINES. THOSE BUSES HAVE TO CONSTANTLY CROSS BIKE LANES ! EXTREMELY UNSAFE !

! ALTERNATIVES ARE MANDATORY !

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Name: STEVEN D. SANN
Organization (optional): WESTWOOD COMMUNITY COUNCIL, INC.
Address: 10940 WILSHIRE BOULEVARD, SUITE 1400
Zip Code: LOS ANGELES, CA 90024
Phone (optional): (213) 448-8147
E-mail (optional): stevesann2001@yahoo.com

Comments:

The continued study of a bicycle lane or bicycle path on Westwood Boulevard, between Le Conte Avenue and Wellworth Avenue, as well as between the Expo Line and Santa Monica Boulevard, should be suspended immediately due to significant and unmitigable safety considerations, severe impacts on traffic and mobility, and the massive volume of bus transit on Westwood Boulevard. You must study alternative routes including Veteran Avenue, Gayley Avenue, Sepulveda Boulevard, Weyburn Place, and possibly residential streets such as Glendon Avenue and others. Thank You!

(Please write on the back if you need more room)

Please drop the completed form into the box marked "COMMENTS" or mail to:
Ms. Conni Pallini-Tipton, AICP, City Planner
City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012

Comments may also be submitted via email to westside2@fehrandpeers.com.
All comments must be received no later than **5:00 pm on June 23, 2014**.

Written Comments

for the

Coastal Transportation Corridor and West Los Angeles Transportation Improvement and Mitigation Plan (CTC/WLA TIMP)
Specific Plans Amendment Project EIR
Public Scoping Meeting

Thursday, June 5, 2014, 6:00 p.m. to 8:00 p.m.
Westside Pavilion Community Room B
10800 W. Pico Boulevard
Los Angeles, CA 90064

Monday, June 9, 2014, 6:00 p.m. to 8:00 p.m.
Venice High School
13000 Venice Boulevard
Los Angeles, CA 90066

Name: Marilyn Cohon
Organization (optional):
Address: 1906 Prosser Avenue
Zip Code: Los Angeles 90025
Phone (optional):
E-mail (optional):

Comments:

We must remove Westwood Boulevard from the bike plan
We must get together with community reps to find an alternate N/S street and devote time and funding to create a safe alternative between EXPO and UCLA

(Please write on the back if you need more room)

Please drop the completed form into the box marked "COMMENTS" or mail to:
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* Monday, June 9, 2014, 6:00 p.m. to 8:00 p.m.
Venice High School
13000 Venice Boulevard
Los Angeles, CA 90066

Name: CHARLES MILLER
Organization (optional): PALMS NEIGHBORHOOD COUNCIL
Address:
Zip Code: 90034
Phone (optional):
E-mail (optional): CHARLESMILLER@PALMSLA.ORG

Comments:

(1) NO ONE WANTS BRT. RAISE TAXES AND BUILD THE LRT NOW, NOT "IN THE FUTURE". THIS IS THE ONLY WAY TO GET PEOPLE OUT OF CARS.

(2) WE DO NEED A PEDESTRIAN CORRIDOR FROM PALMS STATION (ON EXPO) TO NATIONAL/MOTOR.

(3) USE ONLY NATIVE LANDSCAPING

(4) WE NEED PARKING FOR PALMS STATION — NOT A PERMIT ZONE FOR PALMS.

(Please write on the back if you need more room)

Please drop the completed form into the box marked "COMMENTS" or mail to:
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Westside Pavilion Community Room B
10800 W. Pico Boulevard
Los Angeles, CA 90064

X Monday, June 9, 2014, 6:00 p.m. to 8:00 p.m.
Venice High School
13000 Venice Boulevard
Los Angeles, CA 90066

Name: Terri Tuprit
Organization (optional): West of Westwood ~~HOA~~
Address: PO Box 64496
Zip Code: 90064
Phone (optional):
E-mail (optional):

Comments:

Expo is at grade at Westwood adding Bike lanes on Pico on Westwood along w/ the increase in buses is not good planning.

(Please write on the back if you need more room)

Please drop the completed form into the box marked "COMMENTS" or mail to:
Ms. Conni Pallini-Tipton, AICP, City Planner
City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012

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Written Comments

for the

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10800 W. Pico Boulevard
Los Angeles, CA 90064

X Monday, June 9, 2014, 6:00 p.m. to 8:00 p.m.
Venice High School
13000 Venice Boulevard
Los Angeles, CA 90066

Name: WILLIE BELL PALMS

Organization (optional):

Address: 3655 MIDVALE AVE., APT. 12

Zip Code: 90034

Phone (optional):

E-mail (optional): WBELL@WLCLA.EDU

Comments:

NO MORE BUSES, PLEASE.

(Please write on the back if you need more room)

Please drop the completed form into the box marked "COMMENTS" or mail to:
Ms. Conni Pallini-Tipton, AICP, City Planner
City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012

Comments may also be submitted via email to westside2@fehrandpeers.com.
All comments must be received no later than **5:00 pm on June 23, 2014**.

Sarah Brandenberg

From: Ryan Lisko <ryanlisko@yahoo.com>
Sent: Tuesday, July 08, 2014 8:44 PM
To: WestsideMobilityPlan
Subject: Centinela Creek Bike Path

Hi,

I was wondering if there was anything in the works to add a bike lane to Centinela Creek, with it eventually meeting with the Ballona Creek Trail? The Centinela Creek is visible from La Cienega on and would provide a great resource for myself and other residents of Westchester, Inglewood, and Culver City.

Thanks Ryan Lisko

Sarah Brandenberg

From: Alek <alek3000@sbcglobal.net>
Sent: Monday, June 23, 2014 11:11 AM
To: WestsideMobilityPlan
Subject: RE: Westside Mobility Plan
Attachments: Troll_AM_06-MTA.jpg; Troll_AM_13-MTA.jpg; Troll_AM_14b-MTA.jpg; Troll_AM_08 (Large).jpg

Importance: High

Dear Sir or Madam:

I believe, to dramatically improve public transportation in LA County, Electric Trolleybuses should be implemented. 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. Once the wiring is placed, operating costs become significantly lower.

Electric trolleybuses are energy-efficient. Their overhead wires draw power from central electrical power supply sources, costing less than bus fuel – even CNG.

Trolleybuses have been successfully used in many U.S. cities, including San Francisco, Seattle, Boston, Philadelphia, and Dayton. Trolleybuses are also widely used throughout Europe, Asia, South America, North America, and other parts of the world.

Please refer to the renderings below, and a photo of a Škoda trolleybus. Those types of vehicles run on San Francisco streets. Škoda trolleybuses actually resemble the Neoplan 40-foot buses that L.A. has had for many years. Those Škoda models would be perfectly suitable for Los Angeles!

As far as Los Angeles, trolleybuses are not a new idea here! As mentioned earlier, trolleybuses did exist up until 1960's.

Electric trolleybuses have numerous advantages over CNG buses:

1) They're inexpensive to implement. While electric trolleybuses originally cost more per vehicle, in the long run they save MTA tons of money due to much 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-choked 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).

It's time for Los Angeles to start catching-up not only to other major cities across the world, but to nearby cities like Seattle, San Francisco, and many others. Now that Los Angeles is expanding its metro-rail network, and preparing to re-build its first streetcar line on Broadway, launching electric trolleybuses should greatly complement our transit developments. Streets like 3rd Street, Wilshire Blvd, Sepulveda Blvd, La Brea Avenue, Vermont Avenue, Ventura Blvd, and many others, can successfully implement trolleybuses. I believe, the Škoda vehicles – successfully used in San Francisco, CA or Dayton, OH – will be perfectly suitable for Los Angeles streets. Both 40-feet and 60-feet articulated vehicles (depending on passenger demand on a given corridor) should be placed into service.

Even our mediocre Orange line BRT could be converted to a trolleybus line (see renderings attached); so that cyclists don't have to endure "clean" fumes from those noisy CNG buses running next to the bikeway. Ideally, though, I would love to see the Orange line upgraded to Light-rail, to meet increasing demand and future growth of San Fernando Valley.

Given our mass transit comeback, I'm confident it's only a matter of time till electric trolleybuses are re-launched in L.A. But trolleybuses don't have to be the only innovation in our city. Bus stops and connection hubs need a serious upgrade as well; many stops don't even have shelters. Metro, along with individual city municipalities should work together to turn our blighted, dirty bus benches into respectable transit stops. Our city deserves better mass transit, and our transit riders deserve being treated like human beings, not second-class citizens.

Thank you for your attention to this matter.
- Alexander Friedman
(323) 465-8511


Local
Metro Local


DO NOT
ENTER
CHATSWORTH
ONLY
BUS


9210
9484


31
BALBOA
Ocean Beach
7120

Sarah Brandenberg

From: Pamela Day <pamela@crimsonholdings.com>
Sent: Monday, June 23, 2014 3:36 PM
To: WestsideMobilityPlan
Subject: Westside Mobility Plan Comments

While I applaud the idea of enhancing our transit options, I believe that financing these initiates through a development fee on new housing is short-sighted and myopic.

The reason the Westside is choked with traffic is because we have an employment center here without the corresponding attainably-priced housing to support it. Housing prices on the Westside have skyrocketed in recent years, not only due to an increase in jobs but because housing is so expensive, workers must live outside the area and commute in to it.

By adding an additional tax on new housing construction, you're making the price of the much-needed housing actually *higher*, thereby creating a regressive tax and exacerbating the very problem you aim to combat. This is a short-sighted solution.

At the very least, why not create *incentives* for developers to make more transit oriented housing. Why not give a parking exception if they provide a free shuttle, or increase density allowances or decrease parking requirements near transit stops?

I urge you to reconsider this tax and, at the very least I urge you to provide some incentives for housing developers to engage in development on the Westside. Nimbyism and strong community groups run by a small number of loud voices have scared off new development. Right now, the Westside falls far behind Downtown and Hollywood for new housing development.

Please reconsider taxing new housing construction with this ill-conceived solution and find a more appropriate way to finance these initiatives and actually produce more housing on the westside!

Thanks,.

Pamela Day

Sarah Brandenberg

From: The Cains <cainfam@verizon.net>
Sent: Monday, July 07, 2014 11:42 AM
To: WestsideMobilityPlan
Subject: Transportation Funding and Development Impact Fees

Dear Sir or Madam:

What is the status of the Transportation Funding and Development Impact Fees? Are there currently any collected fees that have been designated for any approved project for the Coastal Transportation Corridor Area?

Please place me on the distribution list regarding the Westside Mobility Plan.

Thank you.

Regards,

Mary Cain
Second Vice President Del Rey Residents Association (DRRA)

Sarah Brandenberg

From: Drew Heckathorn <dheckathorn@siegelgale.com>
Sent: Tuesday, June 10, 2014 5:54 PM
To: WestsideMobilityPlan
Subject: CTC/WLA TIMP Specific Plans Amendment Project EIR

Hi,

Thank you for your work thus far in making the Westside a happier, healthier place to live, work and play! As a resident of Westwood, I have a number of comments to the projects listed in the West LA TIMP Specific Plan DRAFT Project List:

- **Lincoln BRT/Sepulveda BRT –** In order for BRT to be effective, it must have *exclusive lanes for the entirety of the route*. This will require coordination between the City of LA, Culver City, Marina Del Rey, Santa Monica and Los Angeles County. The Wilshire BRT project is severely impacted by the gaps in exclusive lanes, especially at major choke-points (crossing the 405, Beverly Hills, etc.).

- **Westwood Boulevard** – Culver City, Palms and the Expo Line desperately need bike and transit access to UCLA and Westwood Village. *Westwood Boulevard is the link*. The City of LA needs to lead this discussion with courage and foresight, rather than let a few NIMBY naysayers in the area control the debate. We need dedicated transit lanes, cycle tracks or both.

- **Barrington Avenue/McLaughlin Avenue BFS –** The Westside is lacking in safe North/South routes for bicyclists. This corridor needs to be safer.

- **Ohio Avenue BFS –** This is a key bicycle corridor between Westwood and West LA, however the street is very dangerous, especially for bicyclists traveling West where there is no bike lane. This corridor needs to be safer.

- **Veteran Avenue BFS –** A potential alternative to Westwood Boulevard, however in its current state, it is not safe for bicyclists. Particularly, north of Santa Monica Boulevard, Veteran is narrow, cars are moving fast, and there's a blind hill south of Massachusetts. This corridor needs to be safer.

- **Santa Monica Boulevard BRT –** Would provide a good connection between West LA, Westwood and Century City *providing that it runs in exclusive lanes for the entirety of the route (especially crossing under 405).*

I appreciate the opportunity to provide my input and wish you luck on the rest of the study. Thank you!
--

Drew Heckathorn
Finance & Operations Analyst

siegel+gale
10960 Wilshire Boulevard, Suite 400
Los Angeles, CA 90024

+1 310.312.2219 office

+1 310.312.2202 fax

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Sarah Brandenberg

From: Cohon Family <cohon@cohon.net>
Sent: Wednesday, July 23, 2014 4:53 PM
To: WestsideMobilityPlan
Cc: Paul Koretz; Cohon Family
Subject: Mobility Plan 2035

Dear Ms La,
As a longtime resident of the Westside, an engaged community member, and one who walks a great deal, I would like to make the following comment:

Westwood Boulevard would be an extremely poor choice to install bike lanes. In order to optimize the Westwood Boulevard EXPO station projected to have 5200 boardings a day, we need to have a good vehicular flow, not limit it by removing lanes. Alternate adjacent streets would be superior candidates for bike-friendly streets.

And the various segments of the community must be involved in the decision-making process. To try to impose these one-size-fits-all ideas on communities without input or thoughtful consideration is a sure-fire recipe for poor planning and community resistance.

Please include us in the dialogue.

Thank you,
Marilyn Cohon

Sarah Brandenberg

From: The Cains <cainfam@verizon.net>
Sent: Thursday, July 03, 2014 11:45 AM
To: WestsideMobilityPlan
Subject: Bicycle Project Plan from McConnell across Ballona Creek across Centinela Creek to Beethoven Street in Area H of the Del Rey Neighborhood

Dear Sir or Madam,

Regarding the Westside Mobility Plan, would you please provide us with, or point us to, the ***Bicycle Project Plan*** from McConnell across Ballona Creek across Centinela Creek to Beethoven Street in Area H of the Del Rey Neighborhood.

Thank you,

Mary Cain, Second Vice President Del Rey Residents Association
Jim Cain
310-617-7971

Sarah Brandenberg

From: eliz.pollock@gmail.com
Sent: Thursday, July 17, 2014 5:15 PM
To: WestsideMobilityPlan
Subject: Comments on Westside Mobility Study
Attachments: Mobility Study Comments 071714 final.doc

The scanned version of the attached letter and the photo that was enclosed with the letter exceeded the size parameters of your email system. Therefore, I have attached an unsigned copy of the comments from the Del Rey Residents Association. A hard copy with the enclosure has been mailed to Conni Pallini-Tipton.

Best regards,

Elizabeth A. Pollock
President
Del Rey Residents Association

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

July 17, 2014

VIA U.S.P.S. AND E-MAIL TO westside2@fehrandpeers.com

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

Case No. ENV-2014-1458-EIR, CPC -2014-1456-SP and CPC-2014-1457-SP

Project Name: Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan (CTSCSP/WLA TIMP) Specific Plans Amendment Project

Project Location: The Del Rey community within the Coastal Transportation Corridor Specific Plan

Community Plan Areas: Palms-Mar Vista-Del Rey Community Plan

Council District: 11

Public Comments: Due July 23, 2014

Ladies and Gentlemen:

The Del Rey Residents Association, a social welfare organization, has improvement of the Del Rey community as one of its primary objectives. Although Del Rey has multiple zip codes and place names that suggest that it is in Culver City, Mar Vista or Marina del Rey, it has been a division of the West Los Angeles Planning Commission since 1903. Del Rey is bounded roughly by Jefferson Blvd., Lincoln Blvd., Washington Blvd. and Sepulveda Blvd.

We are working closely with the Department of City Planning to develop a Streetscape Plan for Centinela Avenue between Washington Blvd. and Jefferson Blvd.. The segment between Short

Avenue and Culver Blvd. is being analyzed in the *Livable Boulevards* program and is on the waiting list for the Mayor's Great Streets program. In addition to our efforts on Centinela, we have the following comments:

1. Traffic Impact Fees. Although there have been some mixed use and commercial developments in the Glencoe-Maxella Specific Plan area and in the Mesmer Triangle (bounded by Centinela Avenue, Jefferson Blvd., 405 freeway), much of the recent development in Del Rey has been construction of multi-family residential in areas that were previously low density residential, e.g. east of Inglewood Blvd. between Culver Blvd. and Washington Blvd.. We would urge that whenever additional square footage is added to an area, the builder should be required to pay a traffic impact fee based upon the square footage added. (For example, there are now 12 units where there used to be one home at 4980 Centinela Avenue. At 11807 – 11811 W. Culver Blvd., there is a proposal to replace five units with 27 units of housing.) These fees should be designated for use to build bicycle lanes, crosswalks, sidewalks, other traffic mitigation measures within one mile of the construction project.

2. Repaving. When the Department of Water and Power finishes laying the Scattergood power transmission line (December 2014), the entire route (Centinela Ave. from Olympic Blvd. to Culver Blvd., then Culver Blvd. to Vista del Mar, and Vista del Mar from Culver Blvd. to El Segundo) needs to be repaved. The patched pavement is already uneven and hazardous.

3. Mesmer Triangle. As this area is the last commercial/industrial section of Del Rey that is not mixed use, its future mobility needs should be planned, particularly with an eye to the developments already approved, but not yet built, in Culver City between Jefferson Blvd. and Sepulveda Blvd..

4. ITS. The intersection of Centinela Avenue/Jefferson Blvd. has been rated "F" for at least a decade. We would especially encourage implementation of the Intelligent Transportation Systems (ITS) at that intersection and at the intersection of Culver Blvd./Centinela Avenue.

5. Mobility Hub. We do not believe that Jefferson Blvd./Lincoln Blvd. would be an appropriate place for a mobility hub because there should be no construction in the Ballona Wetlands.

6. Park N Ride. The public land between the two sides of the Marina Expressway between Culver Blvd. and Lincoln Blvd. should be used to build a Park N Ride facility for people wanting to go to Santa Monica or LAX. There could be a mobility hub at the Culver Blvd./90 freeway end of the property that would connect north/south and east/west transit lines. Any building on that

land should be made available for public meetings, much like the Henry Medina Building at Sepulveda Blvd./Exposition Blvd.. (Del Rey has no publicly owned community meeting space.)

Alternatively, there could be a mobility hub where the Marina Expressway ends at Lincoln Blvd., but that triangle of land is privately owned. A few years ago, the owners wanted to build a 30 story apartment building there.

7. Dangerous intersections. Residents have complained to us that the four way stop at Alla Road/Mindanao should be replaced with a signal. We also have heard complaints about the right/left turn from Alla Road onto Culver Blvd. onto the 90 freeway eastbound.

8. Culver Blvd. Corridor. On Culver Blvd. between Centinela Avenue and the 405 freeway, there are traffic backups at Berryman Ave. and Slauson Ave. when drivers want to turn left. There should be signalized left turn lanes for turns into Berryman northbound and southbound and for Slauson southbound.

Crosswalks also are needed at Stoner Avenue and Slauson Avenue for families that are crossing Culver Blvd. to reach the median's bike path/walking path.

9. Bicycle routes. In the plan, several streets are slated to become "bicycle friendly," but many of those streets actually need bike lanes because they are high traffic streets and/or are likely to be used by schoolchildren:

a. Centinela Avenue between Jefferson Blvd. and Sepulveda Blvd. (partly in Culver City; access to Playa Vista parks, walking paths);

b. Inglewood Blvd. between Jefferson Blvd. and Venice Blvd. (passes three elementary schools);

c. Glencoe Ave. from Alla Road to Washington Blvd. (passes office complexes and shopping centers);

d. Mindanao from Alla Road to Lincoln Blvd. (continuing the Short Ave. bike lane past Short Ave. Elementary);

e. Maxella between Lincoln Blvd. and Alla Road (otherwise, cyclists will ride on the sidewalk);

f. Beatrice St. and Westlawn Ave. (Animo Charter, Westside Neighborhood School, possible Goethe Charter School);

g. Braddock Drive between Centinela Ave. and Sawtelle Blvd. (connecting the existing bike lanes and passing two elementary schools);

f. McConnell Avenue, on both sides of the creek (passes four schools).

Construction of the Milton Street Park is slated to begin next month, but we have not yet seen the final plans that show how it connects to the Ballona Bike Path next to it.

We fully support having a bike lane down Culver Blvd. from Lincoln Blvd. into Playa del Rey, and we would favor making that a "bike path."

10. Bicycle/pedestrian bridge. We were pleased to see that you anticipate a pedestrian/cycling bridge across Ballona Creek, but we would strongly recommend that it be built on the existing railroad right of way trestles that are to the west of McConnell Avenue, roughly opposite Beethoven Ave. (see attached photo).

11. Centinela Multi Use and Sepulveda Multi Use Bicycle Paths. If use of these routes is going to be promoted, someone needs to take responsibility for patrolling them. Residents report that before the gates to these paths were closed, there were robberies, gang gatherings, graffiti and drug dealing.

12. Circulator/shuttle. We have been lobbying for changes in the Santa Monica and Culver City bus routes to provide better service to the Mar Vista Gardens housing project and the affordable housing near there. However, the route proposed for the Marina Playa Fox Hills Circulator is already served in part by the Metro 108 and 110 and the Culver City 2 bus routes. We would recommend extending the existing bus routes so that they will intersect with transit nodes on Lincoln Blvd.. The Culver City 2 should also run on weekends.

13. Sound Walls . After the project to add High Occupancy Vehicle lanes to the 405, sound walls should have been built at the transition from the 405 to the 90, and we still want the noise mitigation/sound walls that we have been requesting since the 90 freeway was built more than 40 years ago.

14. Parking. When the Westside Parking Study comes out, we will need to find a way to apply the $350,000 Parking Mitigation Fund that Playa Vista has paid for the benefit of our organization as mitigation for the approximately 24 spaces that we will lose on Jefferson Blvd. between Mesmer Avenue and Inglewood Blvd. and the approximately six spaces that already were lost in front of the businesses on Centinela Avenue just north of Jefferson Blvd.. The replacement parking should be in the Mesmer Triangle, but parking management strategies may be needed in lieu of purchasing 30 parking spots.

15. Scenic corridor. Part of the Ballona Wetlands is in Del Rey (north of Ballona Creek, east of Lincoln Blvd.), and we have come out against the proposal to allow the Annenberg Foundation to construct a 46,000 square foot building in the wetlands. We believe the wetlands should be left alone and that Culver Blvd. should become a scenic corridor through the wetlands.

To meet the July 23, 2014, deadline for submitting comments, this letter has been prepared by our land use and planning committee and approved through an electronic vote by our board.

Very truly yours,

DEL REY RESIDENTS ASSOCIATION

By Elizabeth A. Pollock, President

Enclosure: Photo of trestles across Ballona

Cc: (via email)
Councilmember Mike Bonin
Paul Backstrom, Transportation Director
Cecilia Castillo, Del Rey Deputy
Tricia Keane, Planning Deputy
Jonathon Neumann, Del Rey Neighborhood Council

Sarah Brandenberg

From: Bill Chapman <billchapman@hotmail.com>
Sent: Friday, June 27, 2014 10:12 AM
To: WestsideMobilityPlan
Subject: Westside Mobility Meetings and Participation

Are there any more meetings planned?
I am sorry I missed the two.
I have lived here on the Westside for some 15 years as an owner and a renter.
I am concerned that the developers are getting pretty much everything they want, I see variances from the four unit height limit to five and more.
All the single family residences are being demolished in favor of high density living.
Santa Monica and Wilshire are both parking lots during certain hours.
AND YET we continue to pack people into every square inch available because of the money to be made for people who do not even reside here.
I went to a meeting several years ago to oppose a carwash on the block I live.
The owner did not even bother showing up and yet he got a favorable ruling.
That left a bad taste as far as participating in the governance and the planning.
Please let me know how I can actually have an effect on what goes on here.
It seems that the vested interests have it all wrapped up!
Sincerely,
William Chapman
Idaho and Westgate
310 869 6562
PS If any one else feels this way, please call me.

Sarah Brandenberg

From: Tom Mallen <thmallen@sbcglobal.net>
Sent: Wednesday, July 23, 2014 3:17 PM
To: WestsideMobilityPlan
Subject: WMPSA comment

Noticed in the June 9 meeting that the Lincoln Blvd concept omitted a change in traffic flow westbound on Culver Blvd. Currently there is only access to Culver Blvd from Lincoln northbound to travel east on Culver. East bound traffic on Culver has access to northbound Lincoln. There is no access to Lincoln southbound from Culver. Also no access to Culver from southbound Lincoln. Jefferson Blvd & Lincoln Blvd is just south of this crossing point and is the entry to Playa Vista development with a very high density factor. Improving the traffic flow where Lincoln and Culver intersect would be a major improvement. The Culver bridge/overpass is a bottleneck currently with the restricted flow caused by the size of the bridge. Balancing the access to allow a east and west transition from Lincoln as well as north and south transition from Culver must be a part of any sensible improvement of this section of travel along Lincoln Blvd.

Respectfully,

Thomas Mallen
6726 W 85th Pl
Los Angeles, CA 90045
thmallen@sbcglobal..net