

IV. COMMENTS AND RESPONSES

CITY OF LOS ANGELES FIRE DEPARTMENT (LAFD)

COMMENT 1.1

The project site consists of a square parcel approximately 35.5-acres in size, bounded by Prairie Street on the north, Corbin Avenue to the west, Nordhoff Street to the south, and Shirley Avenue to the east. At the direction of Planning Department staff, a rectangular “Add Area” approximately 15 acres in size bounded by the southern property line of commercial properties that front Plummer Street on the north, Corbin Avenue to the west, Prairie Street to the south, and Shirley Avenue to the east has been included as part of the analysis of a General Plan Amendment and Zone Change proposed for the site. The “Add Area” is not under the control of the applicant. It is currently developed and consists of 15 separate parcels of land, each under separate ownership.

The project site is located within the Chatsworth-Porter Ranch Community Plan Area. The proposed project includes a General Plan Amendment from Light Industrial to Community Commercial and a Zone Change from [T][Q]M1-1, MR2-1 and P-1 to C2-1.

Because a specific development proposal is not being made as part of this report, Planning Department Staff has directed that a Draft Master Environmental Impact (DMEIR) Report be prepared for this project. Four worst-case development scenarios for the project area (35.5 acres) and four potential development scenarios for the “Add Area” (15 acres) are presented.

Project Area

Scenario 1: Retail

340,000 square feet Retail
389 Senior Housing units
35 Assisted Living units

Scenario 2: Office

930,000 square feet Office
389 Senior Housing units
35 Assisted Living units

Scenario 3: Retail/Residential

250,000 square feet Retail
300 Condominium units
389 Senior Housing units
35 Assisted Living units

Scenario 4: Office/Residential
690,000 square feet Office
300 Condominium units
389 Senior Housing units
35 Assisted Living units

“Add Area”

Scenario 1: Retail
200,000 square feet Retail

Scenario 2: Office
586,000 square feet Office

Scenario 3: Retail/Residential
150,000 square feet Retail
100 Condominium units

Scenario 4: Office/Residential
435,000 square feet Office
100 Condominium units

These proposals were analyzed separately creating a total of eight potential development scenarios. For purposes of this reply to the DMEIR, because the development proposed includes commercial elements and may, depending on the scenario selected, in fact be predominantly commercial, both the project area and the “Add Area” will be regarded as commercial developments.

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

C. Fire Flow

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

Fire-flow requirements vary from 2,000 gallons per minute (GPM) in low-density Residential areas to 12,000 GPM in high-density commercial or industrial area. A minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system, with the required

gallons per minute flowing. The required fire-flow for this project has been set at 6,000 - 9,000 GPM from 4 to 6 fire hydrants flowing simultaneously.

D. Response Distance, Apparatus, and Personnel

The Fire Department has existing fire stations at the following locations for initial response into the area of the proposed development:

Fire Station No. 104
8349 Winnetka Avenue
Canoga Park, CA 91306
Single Engine Company
Paramedic Rescue Ambulance
Staff - 6
Miles - 1.5

Fire Station No. 103
18143 Parthenia Street
Northridge, CA 91324
Single Engine Company
Staff - 4
Miles - 2.0

Fire Station No. 107
20225 Devonshire Street
Chatsworth, CA 91311
Single Engine Company
Paramedic Rescue Ambulance
Staff - 6
Miles - 2.2

The above distances were computed to 19601 Nordhoff Street.

Based on these criteria (response distance from existing fire stations), fire protection would be considered inadequate.

E. Firefighting Access

During demolition, the Fire Department access will remain clear and unobstructed.

No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units.

Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.

The Fire Department may require additional vehicular access where buildings exceed 28 feet in height.

No framing shall be allowed until the roadway is installed to the satisfaction of the Fire Department.

Private streets shall be recorded as Private Streets, AND Fire Lane. All private street plans shall show the words "Private Street and Fire Lane" within the private street easement.

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

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

All structures shall be sprinklered.

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

CONCLUSION

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

For additional information, please contact Inspector Griffin of the Construction Services Unit at (213)482.6506.

WILLIAM R. BARMATTRE
Fire Chief

RESPONSE 1.1

The comments are consistent with those provided by the Fire Department in their letter of July 25, 2002, and are consistent with the findings in **Section IV. Environmental Impact Analysis, K. Public Services 1. Fire (Pages 265-271)** of the Draft MEIR. With the exception of more specific mitigation measures regarding Fire Department access during demolition, distance from edge of roadways to dwelling unit entrance and exitways, timing of framing, private street and fire lane identification, hydrant location and installation, and submittal of plot plans, all mitigation measures identified by the commenter are included in the Draft MEIR. Inclusion of the additional mitigation measures further reduces the less than significant impact noted in the Draft MEIR. See **Section III, Corrections and Additions** Numbers 2 and 8 for the additional mitigation measures.

CITY OF LOS ANGELES POLICE DEPARTMENT (LAPD)

COMMENT 2.1

After reviewing the Draft Master Environmental Impact Report regarding the proposed development at Corbin Avenue and Nordhoff Street, Devonshire Area proposes the following crime deterrent actions:

- During the development stage of the project, Devonshire Area of the Los Angeles Police Department (LAPD) will provide extra patrol for the location when possible.
- The on-site project manager will maintain regular liaison with the Devonshire Area Senior Lead Officer for the location during development.
- Upon completion and staffing, the on-site management will establish a liaison with the Senior Lead Officer.
- The on-site management and residents of the development will establish and Apartment/Condo Watch group for crime prevention.
- Quarterly Apartment Watch meetings will be conducted by the Senior Lead Officer at the site initially addressing emergency services available, communications with the LAPD, organizations and functions of the LAPD, senior crimes and identity theft.

For further information, please contact Senior Lead Officer Don Graham at (818)363.1726, via his voicemail at (818)756.9011, ext 1755.

RESPONSE 2.1

The mitigation measures proposed by the commenter are consistent, but more specific than those in the Draft MEIR. Inclusion of the additional mitigation measures does not change the finding of the Draft MEIR. See **Section III, Corrections and Additions** Numbers 3 and 9 for the additional mitigation measures.

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS, BUREAU OF ENGINEERING, LAND DEVELOPMENT GROUP

COMMENT 3.1

The staff of the Bureau of Engineering has reviewed your referral dated September 11, 2003, in regard to the aforementioned DMEIR. The Bureau of Engineering has no comments at this time in addition to our previous comments dated January 14, 2003.

Should you have any questions in this regard, please call Ray Saidi at (213)977.7097.

RESPONSE 3.1

Comment acknowledged. The "previous comments dated January 14, 2003" referenced by the commenter are included in Appendix A of the Draft MEIR. The comments and concerns of the Bureau of Engineering were included in the preparation of the Draft MEIR.

**CITY OF LOS ANGELES, BUREAU OF SANITATION
WASTEWATER ENGINEERING SERVICES DIVISION**

COMMENT 4.1

This is in response to your September 11, 2003 request for comment on the draft master environmental impact report of the proposed project. The following are comments from the Bureau of Sanitation, Wastewater Engineering Services Division, on the proposed project and a preliminary evaluation of potential impacts on the wastewater services related to the proposed site.

Review of the projected wastewater flows, the corresponding flow generation factors, wye-maps showing existing sewer lines to the proposed site, and sewer lines capacities indicate the following:

The Projected Wastewater Discharges (Scenario 4: Office/Residential) for the Proposed Project:

Type Description (land use)	Generation Rate per Type Description (GPD/UNIT)	Amount of Unit per Use	Sewage Generation (GPD)
Office	200/1000 sf	690,000 sf	138,000
Condominiums	150/du	300 du	45,000
Senior Housing Units	150/du	389 du	58,350
Assisted Living Units	85/du	35 beds	2,975
Total			244,325

The local sewers in the project area include:

Eight-inch diameter sewer in Prairie Street,
Eight-inch diameter sewer in Melvin Avenue,
Ten-inch diameter sewer in Shirley Avenue,
12-inch diameter sewer in Corbin Avenue, and
18-inch diameter sewer in Nordhoff Street.

Ultimately, this sewage flow will be conveyed to the Tillman Water Reclamation Plant (TWRP) in the San Fernando Valley for treatment. Any flow not treated at TWRP will be conveyed downstream for treatment of the City's Hyperion Treatment Plan [sic] in Playa del Rey.

RESPONSE 4.1

Comment acknowledged. Commenter is referred to the Draft MEIR, Section IV. Environmental Impact Analysis, N. Utilities, 4. Sewers where information regarding the proposed sewage generation, existing sewers in the project area, and existing wastewater treatment facilities is provided. Information was gathered from the City of Los Angeles Wastewater Program Management, Sewer Facilities Charge Guide and Generation Rates and from written correspondence, dated October 7, 2002, from Frank V. Bonoff, District Engineer.

COMMENT 4.2

Although a significant impact is not expected on the local sewer lines and the treatment facilities, the necessary permit application and process will still be required when this development gets underway which is processed through the Bureau of Engineering. This office may then conduct a sewer availability study to thoroughly evaluate the additional flow impact to the system concurrent with the Bureau of Engineering permit process and plan check of the proposal. This

may necessitate re-gauging of the flow and calculating the capacities of the sewer line of the area, at that time. It would only be then, that a definite answer to your question of sewer capacity could be answered.

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

RESPONSE 4.2

Per written correspondence, dated October 7, 2003, from Frank V. Bonoff, District Engineer, the proposed project at the project site is not anticipated to exceed existing sewer capacity in the project area.²³ Per Page 456 of the Draft MEIR, the Bureau of Engineering has determined by preliminary assessment that existing sewers in the project area have sufficient capacity to adequately serve the proposed project at the project site. According to the written correspondence referenced above, local sewers upstream of the project site located in Shirley Avenue, Melvin Avenue, and Prairie Street were not included in the sewer capacity analysis prepared by the Bureau of Engineering and would require additional examination upon development. The Draft MEIR identifies that if development occurs in the Add Area (upstream of the project site), implementation of the proposed Mitigation Measure No. 91 on Page 459 of the Draft MEIR will be required to ensure that potential infrastructure impacts from this development are adequately studied and/or examined. Therefore, no changes were made to the Draft MEIR.

CITY OF SANTA CLARITA

COMMENT 5.1

Thank you for the opportunity to review and provide comments on ENV-2002-1230-EIR, proposed by Corbin and Nordhoff located at 19601 Nordhoff Street. As stated on the application form, the current proposal includes a Zone Change and Plan Amendment over 43.5 acres in the Chatsworth-Porter Ranch Community Planning Area.

At this time, the City of Santa Clarita does not wish to make any comments on the Draft Master Environmental Impact Report prepared for the proposed project.

Again, thank you for the opportunity to comment on ENV-2002-1230-EIR. If you have any questions, please contact Fred Follstad, AICP, Senior Planner, at (661)255.4330.

²³ Proposed project at the project site is identified as that development proposed for the 35.5 acres currently under the control of the applicant. The worst-case development scenario for this parcel was identified in the letter submitted by the commenter.

RESPONSE 5.1

Comment acknowledged.

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG)

COMMENT 6.1

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

It is recognized that the proposed Project considers four potential development scenarios, ranging from 340,000 sq. ft. of retail space to 930,000 sq. ft. of office space on 35.5 acres in the Chatsworth - Porter Ranch Community Planning Area in the City of Los Angeles. The proposed Project will also consider the development of up to 300 condominium units. In addition, each development scenario will also consider the development of 389 senior housing units, and 35 assisted living units. The proposed Project is located at 19601 Nordhoff Street, in the City of Los Angeles.

SCAG staff has evaluated the Draft Environmental Impact Report for the Corbin and Nordhoff Project for consistency with the Regional Comprehensive Plan and Guide and Regional Transportation Plan. The Draft EIR includes a discussion on the proposed Projects' consistency with SCAG policies and applicable regional plans, which were outlined in our June 11, 2002 letter on the Notice of Preparation (NOP) for this Draft EIR.

The Draft EIR, in Section IV-G. Land Use, cited SCAG policies and addressed the manner in which the proposed Project is consistent with applicable core policies and supportive of applicable ancillary policies. The Draft EIR incorporated a side-by-side comparison of SCAG policies with a discussion of the consistency or support of the applicable policies with the proposed Project. This approach to discussing consistency or support of SCAG policies is commendable and we appreciate your efforts. Based on the information provided in the Draft EIR, we have no further comments. A description of the proposed Project was published in the September 1-15, 2003 Intergovernmental Review Clearinghouse Report for public review and comment.

If you have any questions, please contact me at (213)236.1867. Thank you.

RESPONSE 6.1

Comment acknowledged.

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

COMMENT 7.1

The Department of Toxic Substances Control (DTSC) has received your Notice of Completion of draft Environmental Impact Report (EIR) for the project mentioned above.

Based on the review of the document, DTSC comments are as follows:

1. The draft EIR states that Phase I Environmental Assessments were prepared by American Environmental Specialist, Inc. (AES) on the Project Site. The EIR should include the government regulatory agency providing the oversight for the Phase I Environmental Assessments.

RESPONSE 7.1

Per Mr. Jim McClung of American Environmental Specialists, Inc. (AES), the preparers of the Phase I Assessments completed at the Project Site and Add Area, there are no federal, state or citywide agencies that oversee the undertaking or preparation of Phase I Assessments.²⁴ The commenter has not identified a specific need why a federal, state, or city agency should have been involved. Therefore, no additions or corrections are required.

COMMENT 7.2

2. If during construction of the project, soil contamination is suspected, construction in the area should stop, and appropriate health and safety procedures should be implemented. If it is determined that contaminated soils exist, the EIR should identify how any required investigation and/or remediation will be conducted, and which government agency will provide regulatory oversight.

RESPONSE 7.2

As identified in the Draft MEIR on Page 194, with adherence to Code requirements, the potential for soil contamination as a result of the proposed Project and development scenarios analyzed for

²⁴Phone conversation between Mr. Jim McClung, American Environmental Specialists, Inc. (AES), and Carrie Riordan, Planning Associates, Inc., October 27, 2003.

the Add Area is considered to be less than significant. The commenter has identified a more specific protocol to ensure that any unidentified soil contamination encountered during construction will be mitigated. As a result, a mitigation measure has been added. Inclusion of the additional mitigation measure does not change the finding of the Draft MEIR. See **Section III, Corrections and Additions** Nos. 1 and 7.

COMMENT 7.3

DTSC provides guidance for Preliminary Endangerment Assessment preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP please visit DTSC's web site at www.dtsc.ca.gov.

If you would like to meet and discuss this matter further, please contact Mr. Alberto Valmidiano, Project Manager, at (818)551-2870 or me, at (818) 551-2877.

Sincerely, Harlan R. Jeché
Unit Chief
Southern California Cleanup Operations Branch - Glendale Branch

RESPONSE 7.3

Comment acknowledged.

STATE OF CALIFORNIA, DEPARTMENT OF TRANSPORTATION (CALTRANS)

COMMENT 8.1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above reference project.

A cumulative traffic impact study should include the State Route 118, all freeway ramps in the vicinity, and Tampa Ave. interchange with queue length analysis along with the proposed development and other related projects including the mitigation measures for the future 20-year traffic conditions.

RESPONSE 8.1

A review of Section IV. Environmental Impact Analysis: M. Traffic of the Draft MEIR shows that the traffic analysis did include a cumulative impact analysis of traffic on State Route 118 and the intersections with the Tampa on and off ramps. Specifically, Pages 387-390 discuss in detail the potential impacts of the project to State Route 118 (SR-118). Forecasted project trips are

summarized in Table 82: Congestion Management Plan Traffic Impact Analysis on Page 389 of the Draft MEIR. As shown, the project will not exceed the established threshold of 150 or more trips during either the AM or PM weekday peak hours to the CMP mainline freeway monitoring locations. Therefore, further review of the SR-118 is not required

The traffic study prepared for the project also provides an analysis of potential traffic impacts at the SR-118 freeway on and off-ramp intersections with Tampa Avenue, the local and convenient SR-118 connection to the project area. As shown on Page 303 of the Draft MEIR, the Tampa Avenue and SR-118 freeway westbound on/off-ramp intersections, as well as the Tampa Avenue and SR-118 freeway on/off-ramp intersections were analyzed as part of the traffic analysis.

The traffic impact study was prepared in accordance with LADOT's Traffic Study Policies and Procedures manual. The traffic analysis evaluated and identifies potential project-related impacts at the year of anticipated build-out year (2005). Analysis of cumulative 20-year conditions exceeds the requirements of CEQA. Section 15130 of the CEQA Guidelines states that:

- (b) "The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact. The following elements are necessary to an adequate discussion of significant cumulative impacts
- (b)(1)(A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or"

As a result, a 20-year forecast will be speculative in terms of this specific project.

It should be noted that the commenter has not identified an inadequacy with the analysis prepared or the information presented in the Draft MEIR but rather provides a summary of suggestions for alternative models and/or information that could be presented which does not warrant or require that additional analysis be conducted. Therefore, no changes have been made to the Draft MEIR.

COMMENT 8.2

To assist us in our efforts to evaluate the impacts of this project on State transportation facilities, a revised traffic study should be prepared. We wish to refer the project's traffic consultant to our traffic study guidelines Website:

<http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf>

RESPONSE 8.2

As stated earlier, the traffic analysis was prepared per LADOT standards. The guidelines (located at <http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf>) indicated by the commenter provide only an alternative method by which to conduct a traffic analysis. The project's potential impacts to the State highway system have been adequately addressed by the traffic study prepared for and used in the Draft MEIR based on significance thresholds and analysis methodologies approved by the City of Los Angeles. Furthermore, no evidence as to the inadequacy of the traffic study prepared was presented to warrant the preparation of a revised traffic study as the commenter suggests. Because the commenter has not identified a particular deficiency or inadequacy with the traffic analysis prepared for the project, there is no reason to use the Caltrans traffic study guideline for this project.

COMMENT 8.3

and we list here some elements of what we generally are expecting in the traffic study:

1. Presentations of assumptions and methods used to develop trip generation, trip distribution, choice of travel mode, and assignments of trips to State Route 118.

RESPONSE 8.3

Review of the Draft MEIR and the traffic study indicates that assumptions and methodologies used to develop the traffic study were presented. Page 310 of the Draft MEIR provides the trip generation assumptions, rates, and forecasts utilized in the traffic analysis. As stated on Page 310 of the Draft MEIR, trip generation forecasts were prepared based on rates provided in the *Trip Generation* manual published by the Institute of Transportation Engineers. The trip distribution and assignment methodology is discussed on Page 315 of the Draft MEIR. The trip generation and trip distribution pattern were reviewed and approved by LADOT prior to inclusion in the Draft MEIR. Therefore, no changes were made to the Draft MEIR.

COMMENT 8.4

2. Consistency of project travel modeling with other regional and local modeling forecasts and with travel data. The IGR/CEQA office may use indices to check results. Differences or inconsistencies must be thoroughly explained.

RESPONSE 8.4

Regional distribution patterns utilized in the traffic analysis were determined to be consistent with the procedures outlined in the CMP manual. The CMP provides generalized trip distribution factors based on regional modeling efforts. The trip distribution factors show Regional Statistical

Areas (RSAs)-level trip making origins and destinations for work and non-work trip purposes. The regional distribution pattern for the project provides general origin and destination trip distributions from the project study area RSA throughout the Los Angeles Basin. The distribution pattern was reviewed and approved by LADOT prior to inclusion into the Draft MEIR.

The commenter has not identified an inadequacy of the consistency with the modeling forecasts provided in the Draft MEIR, nor did the commenter identify differences or inconsistencies between the IGR/CEQA method suggested with the information/modeling forecasts provided in the Draft MEIR and technical appendices. Therefore, no changes were made to the Draft MEIR.

COMMENT 8.5

3. Analysis of ADT, AM and PM peak-hour volumes for both the existing and future conditions in the affected area. This should include freeways, interchanges, and intersections, and all HOV facilities. Interchange Level of Service should be specified (HCM2000 method requested). Utilization of transit lines and vehicles, and of all facilities, should be realistically estimated. Future conditions would include build-out of all projects (see next item) and any plan-horizon years.

RESPONSE 8.5

Traffic impact analysis and methodology, impact criteria and thresholds, and traffic impact analysis scenarios were provided in the Draft MEIR. Page 310 of the Draft MEIR provides the thresholds of significance utilized and a discussion of the traffic impact analysis and methodology. Pages 316 and 325 of the Draft MEIR discuss the traffic impact analysis scenarios. Summaries of the v/c ratios and LOS values determined for each of the thirty nine study intersections are shown in Tables 61 through 68 beginning on Page 330 of the Draft MEIR. Descriptions of the roadways and existing transit service provided in the project vicinity are provided beginning on Page 295 of the Draft MEIR. The Draft MEIR also includes exhibits that show traffic volumes associated with each analysis scenario. The list of exhibits is provided in the Exhibits section at the beginning of the Draft MEIR.

Therefore, a review of the Draft MEIR indicates that the traffic analysis prepared does include analysis of ADT, AM and PM peak-hour volumes, including “freeways, interchanges, intersections” as requested by the commenter. HOV facilities were not included in the comment letter provided by Caltrans on the NOP nor are they included in the guidelines (“Appendix B”) suggested by the commenter in the Draft MEIR response letter. However, no impacts on HOV facilities were identified in the traffic analysis prepared for the project.

The commenter has not specified an inadequacy with the analysis provided or the model used that would warrant revision of the existing traffic study or the use of HCM2000, as requested by the commenter. Future conditions, as shown beginning on Page 316 of the Draft MEIR include

existing + project + other projects + other growth as requested by the commenter. Therefore, no changes were made to the Draft MEIR.

COMMENT 8.6

4. Inclusion of all appropriate traffic volumes. Analysis should include traffic from the project, cumulative traffic generated from all specific approved developments in the area, and traffic growth other than from the project and developments. That is, include:
existing + project + other projects + other growth.

RESPONSE 8.6

The commenter is referred to **RESPONSE 8.5**.

COMMENT 8.7

5. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. These mitigation discussions should include, but not be limited to, the following:
 - Description of Transportation Infrastructure Improvements
 - Financial Costs, Funding Sources and Financing
 - Sequence and Scheduling Consideration
 - Implementation Responsibilities, Controls, and Monitoring

Any mitigation involving transit, HOV, or TDM must be rigorously justified and its effects conservatively estimated. Improvements involving dedication of land or physical construction may be favorably considered.

RESPONSE 8.7

Discussion of the measures proposed to mitigate any potential traffic impacts was included in the Draft MEIR. The proposed traffic mitigation measures begin on Page 390 of the Draft MEIR. Included in the discussion of mitigation measures beginning on Page 390 is information regarding the funding of substantial infrastructure improvements such as the Mason Avenue Extension Project proposed. Table 91: Traffic Mitigation Requirements on Page 403 of the Draft MEIR provides detailed information regarding the sequencing of mitigation measures proposed to reduce potential traffic impacts resulting from the project. Section V of the Final MEIR provides all implementation and monitoring responsibilities.

The traffic analysis indicated that there are no direct or indirect impacts to transit or HOV facilities and therefore, no mitigation for these facilities was proposed. The proposed TDM mitigation was rigorously reviewed by LADOT prior to inclusion in the Draft MEIR. The preliminary TDM plan included in the Draft MEIR was reviewed and approved by LADOT.

COMMENT 8.8

6. Specification of developer's percent share of the cost, as well as a plan of realistic mitigation measures under the control of the developer. The following ratio should be estimated: additional traffic volume due to project implementation is divided by the total increase in the traffic volume (see Appendix "B" of the Guidelines). That ratio would be the project equitable share responsibility.

We note for purposes of determining project share of costs, the number of trips from the project on each traveling segment or element is estimated in the context of forecasted traffic volumes which include build-out of all approved and not yet approved projects, and other sources of growth. Analytical methods such as select-link travel forecast modeling might be used.

RESPONSE 8.8

As indicated on Page 390 of the Draft MEIR, mitigation proposed to reduce potential traffic impacts of the project consists of providing a fair-share contribution to LADOT for the design and construction of the Mason Avenue Extension project. However, this is a contribution to a project-specific impact and the necessary mitigation. The amount of the contribution was determined by LADOT.

A review of "Appendix B" indicates that this method should be used when,

- “• A project has impacts that do not immediately warrant mitigation, but their cumulative effects are significant and will require mitigating in the future.
- A project has an immediate impact and the lead agency has assumed responsibility for addressing operational improvements.”

Neither of these circumstances exist for this project. Further, the calculations for determining a "fair share" per "Appendix B" requires the identification of a total cost for improvements to mitigate the forecasted traffic demand on the State highway facility. To date, no project mitigation other than the Mason Avenue Extension fits this criteria.

The commenter has not identified any inadequacy in the methodology utilized by LADOT. Therefore, no changes to the Draft MEIR are required.

COMMENT 8.9

The Department as commenting agency under CEQA has jurisdiction superceding that of MTA in identifying the freeway analysis needed for this project. Caltrans is responsible for obtaining measures that will off-set project vehicle trip generation that worsens Caltrans facilities and hence, it does not adhere to the CMP guide of 150 or more vehicle trips added before freeway analysis is needed. MTA's Congestions Management Program in acknowledging the Department's role, stipulates that Caltrans must be consulted to identify specific locations to be analyzed on the State Highway System. Therefore, State Route(s) mentioned in Iten #1 and its facilities need to be analyzed per the Department's Traffic Impact Study Guidelines.

We look forward to reviewing the traffic study. We expect to receive a copy from the State Clearinghouse when the DEIR is completed. However, to expedite the review process, and clarify any misunderstandings, you may send a copy in advance to the undersigned.

If you have any questions, please feel free to contact me at (213)897-4429 or Alan Lin the project coordinator at (213)897-8391 and refer to IGR/CEQA No. 030942AL.

Sincerely,
Stephen J. Buswell
IGR/CEQA Branch Chief

RESPONSE 8.9

Contrary to the assertion of the commenter, MTA did not identify the freeway analysis necessary for the project. The comment letter provided by Caltrans for the NOP indicated that "An analysis of ADT, AM and PM peak-hour volumes for both the existing and future (expected project build-out) conditions. ***This should include State Route 118***, affected ramps, street, crossroads, and controlling intersections." Therefore, the freeway systems analyzed and the requested analysis were taken directly from the suggestion of Caltrans during the NOP process. This information was utilized in preparing the traffic study for the project. The MTA and CMP analyses utilized in the traffic study are widely recognized and utilized exclusively by LADOT. As a result of the identification by Caltrans that State Route 118 needed to be included in the traffic analysis, this freeway and associated ramps were analyzed in the traffic study prepared for the project. The commenter is referred to ***RESPONSE 8.1*** and Page 387 of the Draft MEIR.

The commenter has not identified a specific concern or inadequacy with the analysis identified but rather suggests an alternative analysis method. Therefore, no further alternative analysis is warranted or required and no changes have been made to the Draft MEIR.

**STATE OF CALIFORNIA
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
STATE CLEARINGHOUSE**

COMMENT 9.1

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 27, 2003, and the comments from the responding agency (is) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

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

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

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

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

Sincerely,
Terry Roberts
Director, State Clearinghouse

RESPONSE 9.1

Comment acknowledged.

PROPERTY OWNER
ARNOLD COLMAN

COMMENT 10.1

I own property north of Prairie St. which the City of Los Angeles has proposed as an “Add Area” to be included in the Zone Change and Plan Amendment analysis in the Master Environmental Impact Report noted above.

Your letter (copy attached) states that it is the City’s proposed intention to demolish all the buildings north of Prairie St. within 500 feet bound by Corbin to the west and Shirley to the east.

RESPONSE 10.1

The letter referenced by the commenter is the *Notice of Completion and Availability of Draft Master Environmental Impact Report No. ENV-2002-1230-EIR* (NOA), published on September 11, 2003. The fourth paragraph of this notice states,

The proposed Project will include demolition of one- and two-story research and development buildings of approximately 326,500 square-feet at the Project site. Across the Add Area, approximately 42,000 square feet of industrial space, 30,000 square feet of warehouse space, 83,000 square feet of manufacturing space, 27,000 square feet of office space, 98,000 square feet of household storage, a tennis/skate park, and associated surface parking will be demolished....

A review of **Section II. Project Description (Pages 76-78)** of the Draft MEIR identifies that the Add Area was included only for environmental analysis purposes and that the applicant only has control of the 35 acres south of Prairie Street. Page 77 of the Draft MEIR states,

“Add Area

Pursuant to the request of the LADCP staff, fifteen properties located to the north of Prairie Street (“Add Area”) have been included in the analysis of potential environmental impacts. The Add Area is developed with light industrial and commercial uses. At the Add Area, the development scenarios include analysis of the Zone Change from MR2-1 and P-1 to C2-1 and a General Plan Amendment from Light Manufacturing to Community Commercial to coincide with the Zone Change and General Plan Amendment requested at the Project Site. The Add Area properties are not currently under the applicant’s control and each property has a separate owner. Due to the lack of coordinated control over the Add Area properties, the applicant has no control over the processing of applications for properties within the area. Application and initiation of project proposals can either be completed by the City of Los Angeles or the Add Area property owners.”

Page 77 of the Draft MEIR goes on to explain that no specific development plan is proposed for the Add Area and that the development scenarios, including demolition, have been identified to demonstrate the range of development options and are for environmental analysis purposes only.

Also, Page 76 of the Draft MEIR states, “ Potential impacts of the eight development scenarios were based on the worst-case scenario and, based on economic conditions at the time of development, may be less substantial than originally anticipated.”

Therefore, while it is understandable how, from the Notice of Availability, the commenter reached the conclusion that it is the City’s intention to demolish buildings in the Add Area, the Draft MEIR clearly conveys that it is not the City’s intent to demolish the buildings in the Add Area.

COMMENT 10.2

Is it the City’s intention to condemn all this property in the “Add Area” to accomplish this?

RESPONSE 10.2

Please see **RESPONSE 10.1**. As discussed, it is not the City’s intention to condemn the properties located within the Add Area. As stated on Page 77 of the Draft MEIR, the Add Area was included for environmental analysis purposes only. Also, Pages 79-80 of the Draft MEIR include a discussion of the intended use of the Draft MEIR and a list of potential actions and approvals proposed for the Project Site. Condemnation is not identified on that list.

COMMENT 10.3

Will there be a hearing specifically to address this proposed action in the “Add Area”?

RESPONSE 10.3

The commenter is referred to **RESPONSE 10.1**. The City Planning Commission (CPC) will hold a simultaneous hearing on the applicant’s proposed project and the Zone Change and General Plan Amendment suggested by LADCP for the Add Area. All property owners and occupants within a 500-foot radius of the Project Site will be notified of the hearing by mail. The CPC will listen to testimony. The CPC will then make a recommendation to the City Council to approve or deny the requests. If the Zone Change and General Plan Amendment in the Add Area are approved, LADCP recommends that the Add Area properties include a Qualified or “Q” condition to each property. As stated on Page 235 of the Draft MEIR, the Land Use impact will be mitigated to a less than significant level with the following mitigation measure:

37. When the use of this property formerly designated as “Light Manufacturing” is proposed to be discontinued, the proposed use shall be approved by the appropriate decision-maker through a procedure similar to a conditional use. The decision-maker shall determine that the proposed use is consistent with the objectives of the General Plan and is compatible with the land uses, zoning or other restrictions of adjacent and surrounding properties. (O, C, R)

COMMENT 10.4

Also, what is the reason the City Planning Department is creating the “Add Area”? I was under the impression the proposed project was limited to the 35 plus acres of the Litton property.

RESPONSE 10.4

The commenter is referred to **RESPONSES 10.1** and **10.3**. The proposed project is limited to the 35.5 acres of the Litton property, bounded by Prairie Street to the north, Corbin Avenue to the west, Nordhoff Street to the south, and Shirley Avenue to the east. As identified on Page 76 of the Draft MEIR, an application for the 35 acres south of Prairie street was filed on December 17, 2002 under City Planning Case CPC 2002-7295-PPR-BL. As previously stated, properties located within the Add Area were included in the Draft MEIR for planning and environmental analysis purposes only, as requested by LADCP.

COMMENT 10.5

I and other property owners and businesses that I have contacted are very concerned over the proposed demolition or zone change of our property.

Please respond to the questions raised.

RESPONSE 10.5

As discussed in **RESPONSES 10.1-10.4**, the City is not proposing demolition of properties, such as yours, located within the Add Area. Rather, the City has proposed to include the Add Area in the environmental analysis only so as to not create a “spot zone” of manufacturing surrounded by commercial uses. As stated in the Draft MEIR, the Add Area properties are currently surrounded on three sides by commercially designated and utilized properties. To the south of the Project Site, all properties are commercially designated and utilized. If the requested Zone Change and General Plan Amendment is approved for the Project Site, the Add Area properties would be surrounded on *all* sides by commercially designated and utilized land uses and would be the only industrial land east of Corbin Avenue. This circumstance was perceived by the Department of City Planning as an area that needed to be further analyzed. For good zoning practices, the Draft MEIR was required to analyze the potential impacts of the Department of City Planning’s proposal to include the Add Area properties.

REPRESENTATIVE FOR PROPERTY OWNER

KEVIN K. McDONNELL FOR JEFFER, MANGELS, BUTLER & MARMARO LLP

COMMENT 11.1

This office represents Lainer Investments, owners of industrially zoned and used property within the “Add Area” included in the Draft Master Environmental Impact Report (“DMEIR”). The purpose of this letter is to voice particular objections to the inclusion of the “Add Area” north of Prairie Street between Corbin and Shirley along with pointing out deficiencies in the DMEIR with respect to this added property.

RESPONSE 11.1

Comment acknowledged.

COMMENT 11.2

The initial area of the application for a General Plan Amendment and Zone Change (“Project Area”) includes industrial property currently located in the MR2-1 Zone. The Project Description describes several development scenarios for the Project Area including various arrangements of office, retail, and senior housing. At the City Planning staff’s own initiative, the Add Area was included. No particular planning justification for including the Add Area is clearly articulated.

RESPONSE 11.2

The opinion of the commenter is acknowledged. The commenter is referred to ***RESPONSES 11.3*** and ***11.5***.

As stated on Page 224 of Section IV. Environmental Impact Analysis, G. Land Use,

“Currently, the General Plan Amendment request area, which used to be an internal part of the Northridge Industrial Core, is surrounded on three sides by commercial development. Over time, the surrounding land uses have changed and now include retail to the north, retail to the east, and various commercial and retail uses to the south. Moreover, the approval of the Homeplace Retirement facility on the Project Site indicates that the City of Los Angeles may not oppose transition of this area from industrial to commercial. Uses currently within the Add Area such as the tennis facility, skate park, and public storage also indicate the change of land use in the immediate project vicinity. Therefore, the proposed change to the General Plan and corresponding Zone Change is consistent with trends in the community and will result in a less than significant impact to land use due to an inconsistency with the Community Plan.”

No where in the Draft MEIR is a Land Use impact identified if the Zone Change and General Plan Amendment are denied over the Add Area.

COMMENT 11.3

The application for the Project Area simply presents an “opportunity” to further reduce industrially-zoned property within the Chatsworth - Porter Ranch Community Plan Area.

RESPONSE 11.3

The opinion of the commenter is noted. The potential impact on industrially-zoned lands, both at the Project Site and Add Area, are identified in the Draft MEIR on Pages 222 - 235.

COMMENT 11.4

In the Summary section of the DMEIR, an attempt is made to rationalize further reducing industrially-zoned property in the area:

“The General Plan Amendment is requested because it will encourage consistency between the existing land use designation and the existing use of the property. Further, with coordination of land use designations and use for commercial purposes, the General Plan Amendment could encourage the conservation of other industrial lands in the Community Plan that are actually used for industrial purposes currently.”
DMEIR at p. 25.

Not only is the statement inaccurate factually (the Add Area is currently used for industrial purposes), the rationalization that eliminating vital industrial lands can, in some way, inspire conserving industrial lands in other areas of the Community Plan is, at best conjecture.

RESPONSE 11.4

As stated in the Draft MEIR on Pages 232 and 233, major portions of the Add Area properties are currently utilized for commercial purposes (skate park, tennis courts, clubhouse, office space, retail). Properties to the north, east, and west of the Add Area are currently utilized for commercial activities. As indicated in the Draft MEIR, properties to the south of the proposed Project Site (Litton property) are currently utilized for commercial purposes as well.

The argument that “eliminating vital industrial lands can, in some way, inspire conserving industrial lands in other areas” was not provided as the sole justification for the General Plan Amendment. Factual information and arguments were taken directly from the existing Community Plans, the General Plan of the City of Los Angeles, as well as Regional Plans for the area.

COMMENT 11.5

Further, to the extent actual redevelopment of the Add Area to uses conforming with the proposed new planning designation have not been studied (how could they be since no projects are pending?) [sic] The DMEIR is inadequate under the California Environmental Quality Act (“CEQA”).

RESPONSE 11.5

The potential redevelopment of the Add Area has been studied (See **RESPONSE 11.2**). Four potential redevelopment scenarios for the Add Area were analyzed in each environmental impact section of the Draft MEIR. Land Use issues regarding the redevelopment of the Add Area were identified in Section IV. Environmental Impact Analysis, G. Land Use, Pages 230-235.

Per Section 15175 of the CEQA Guidelines,

”The Master EIR procedure is an alternative to preparing a project EIR, staged EIR, or program EIR for certain projects which will form the basis for later decision making. It is intended to streamline the later environmental review of projects or approval included within the project, plan or program analyzed in the Master EIR. Accordingly, a Master EIR shall, to the greatest extent feasible, evaluate the cumulative impacts...on the environment of subsequent projects”

As allowed by the Master EIR process, as project applications are proposed in the Add Area, each project will undergo further environmental review. Each project application will be analyzed using the Project Area Initial Study prepared with the Draft MEIR (Section IX. Initial Study Checklist of the Draft MEIR). If the proposed projects are consistent with what has been analyzed for the Add Area in the Draft MEIR, then applicable mitigation measures outlined in the Draft MEIR will be utilized. If the proposed project differs from what was analyzed or exceeds what was analyzed, then a new Mitigated Negative Declaration (MND) or focused Environmental Impact Report (EIR) will be required. The comment did not identify which portions or sections of the Draft MEIR are inadequate under CEQA. Therefore, no corrections or additions have been made.

COMMENT 11.6

Further, placing an unreasonable burden on the owners of property within the Add Area to “undergo a procedure similar to a conditional use...” in the event the existing light industrial uses are to be discontinued, is not only unreasonable for the Add Area property owners, it unlawfully defers the review of future projects to some unknown date in the future by some undefined process. See proposed “Q” condition No. 37 at pp. 33 and 235 DMEIR.

RESPONSE 11.6

Including the Add Area properties in the environmental analysis of the Draft MEIR does not place undo burden on the property owners located within this area. If the owner of a property in the Add Area was to request a change from industrial designation to another land use independently of the circulated Draft MEIR, said owner would be required to undergo environmental review, as required by CEQA. As discussed in **RESPONSE 11.5**, the Master EIR process is intended to streamline the later environmental review of projects found to be consistent with development scenarios presented in the Draft MEIR. Therefore, property owners would undergo a potentially more expedient environmental review process under the Master EIR process than if they were to undergo an independent environmental review process.

The “Q” condition referenced on Pages 33 and 235 is included to ensure that all projects within the Add Area are required to undergo environmental and land use review process at the time redevelopment is proposed (as would be required if it were not included in the Draft MEIR environmental analysis). The details of this process will be determined by the City Planning Commission at the time of the public hearing.

COMMENT 11.7

Please enter these comments into the record and forward your responses to this office along with the schedule of pending public hearings.

Very truly yours,
Kevin K. McDonnell

RESPONSE 11.7

Comment acknowledged. You will be notified of the completion of the Final MEIR and future hearing dates. The Final MEIR will be available for review at the Planning Department’s website (<http://www.lacity.org/PLN/>) Hard copies will be available for review at the City Planning Department and the following Los Angeles Public Library Branches:

Porter Ranch Branch Library
11371 Tampa Avenue
Porter Ranch CA 91326

West Valley Regional Branch Library
19036 Vanowen Street
Reseda CA 91335

Central Library
630 W. Fifth Street
Los Angeles CA 90071

Mid-Valley Regional Branch Library
16244 Nordhoff Street
North Hills CA 91343

A cd-rom version can be purchased from the Planning Department for \$7.50.