

DEPARTMENT OF  
CITY PLANNING  
200 N. SPRING STREET, ROOM 525  
LOS ANGELES, CA 90012-4801  
AND  
6262 VAN NUYS BLVD., SUITE 351  
VAN NUYS, CA 91401

CITY PLANNING COMMISSION  
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-  
JAMES WILLIAMS  
COMMISSION EXECUTIVE ASSISTANT II  
(213) 978-1300

# CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI  
MAYOR

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DEPUTY DIRECTOR

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INFORMATION  
WWW.PLANNING.LACITY.ORG

April 17, 2014

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

**EIR NUMBER:** ENV-2014-210-EIR

**PROJECT NAME:** Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the MGA Mixed Use Campus Project.

**PROJECT ADDRESS:** 20000 W. Prairie Street

**COMMUNITY PLANNING AREA:** Chatsworth-Porter Ranch

**COUNCIL DISTRICT:** 12, Mitchell Englander

**SCOPING MEETING DATE:** May 5 2014

**DUE DATE FOR PUBLIC COMMENTS:** May 16, 2014

The City of Los Angeles Department of City Planning will be the Lead Agency and will require the preparation of an Environmental Impact Report (EIR) for the project identified herein (Project). The Department of City Planning requests your comments as to the scope and content of the EIR. The Project description, location, and the potential environmental effects anticipated to be studied in the EIR are set forth below. Also included below are the date, time, and location of the Scoping Meeting that will be held in order to solicit input regarding the content of the Draft EIR. The Scoping Meeting will be comprised of an open house format. No decisions about the Project will be made at the scoping meeting. A copy of the Initial Study prepared for the Project is not attached.

**PROJECT DESCRIPTION:** MGA Entertainment, Inc. (the Applicant) proposes an integrated light industrial, corporate office and residential mixed-use campus development project (Campus Project) at 20000 W. Prairie Street in the Chatsworth community of the City of Los Angeles (Project Site). The Campus Project will consist of a mix of uses totaling approximately 1.22 million square feet, including: (1) adaptive re-use and rehabilitation of the former LA Times printing facility (255,855 square feet) for MGA light industrial uses and its corporate

headquarters, as well as ancillary creative office space; (2) 700 rental housing units in four main residential buildings (i.e., Buildings A-D); (3) shared recreational campus amenities located throughout the Site; and (4) approximately 14,000 square feet of campus and neighborhood serving retail and restaurant uses.

The 23.6-acre (1,027,919 square feet) Site is a single parcel improved with a light industrial building formerly used by the Los Angeles Times as a printing facility. A substantial portion of the Site is currently occupied by surface parking (a total of approximately 365 spaces) surrounding the existing building. MGA currently uses the facility for limited showroom, assembly and general office space to support the company's main Van Nuys headquarters.

**ANTICIPATED DISCRETIONARY ACTIONS:** The Project Applicant is requesting the following approvals from the City of Los Angeles: This EIR addresses the environmental impacts of the proposed project that could occur upon approval of the following actions by the City of Los Angeles: 1) General Plan Amendment pursuant to LAMC Section 12.32 E to revise the land use designation in the Chatsworth-Porter Ranch Community Plan from Light Industrial to Community Manufacturing for the entire subject site; 2) Vesting Tract Map pursuant to LAMC Section 17.50 to subdivide the Site into five or more legal lots; 3) Zone change (from MR2-1 and P-1 to CM-1) pursuant to LAMC Section 12.32 F to allow a mix of uses including light industrial, corporate office, residential and neighborhood serving retail and restaurant; 4) Conditional Use Permit (CUP) pursuant to LAMC Section 12.24 to permit a unified development (blended FAR and density across 4 ground parcels (LAMC Section 12.24W.19), on-site childcare in the CM zone (LAMC Section 12.24W.51, and sale of alcoholic beverages (LAMC Section 12.24W.1); 5) Site Plan Review (LAMC Section 16.05); 6) pursuant to various sections of Los Angeles Municipal Code, the Applicant will request approvals and permits from the Building and Safety Department (and other municipal agencies) for project construction activities including, but not limited to the following: demolition, excavation, shoring, grading, foundation, haul route, building and tenant improvements; 7) Permits as needed to cross the City-owned flood control channel to provide access from Winnetka Avenue; 8) Water Supply Assessment approval from Los Angeles Department of Water and Power (LADWP); 9) Modified Parking Requirement District approval to establish special parking ratios and to permit shared parking for commercial and residential uses (LAMC Section 13.15); and 10) potential Development Agreement with the City of Los Angeles.

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

Aesthetics, Air Quality and Greenhouse Gas Emissions; Biological Resources; Geology and Soils (including potential contamination); Hydrology and Water Quality; Land Use; Noise; Public Services and Utilities; and Transportation, Circulation and Parking.

**PUBLIC SCOPING MEETING DATE AND LOCATION:**

The Scoping Meeting will be held on May 5, 2014 at 6 P.M. at 20000 W. Prairie Street (the Project Site). The purpose of the Scoping Meeting is to solicit public comments regarding issues to be addressed in the Draft EIR. The Scoping Meeting will provide information regarding the Project and the anticipated scope of analyses to be contained in the Draft EIR. The Department of City Planning encourages all interested individuals and organizations to attend this meeting. There will be no verbal comments or public testimony taken at this open house meeting. Written comments may be submitted at the Scoping Meeting.

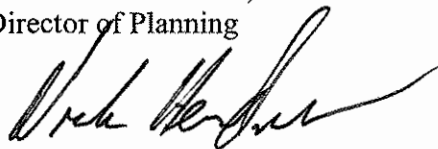
**Date:** May 5, 2014  
**Time:** 6 P.M.  
**Location:** 20000 W. Prairie (Project Site)

The Department of City Planning welcomes all comments regarding the environmental impacts of the proposed Project and the issues to be addressed in the EIR. All comments will be considered in the preparation of the EIR. **Written comments** must be submitted to this office by **5:00 pm May 16, 2014**. Written comments will also be accepted at the scoping meeting described above.

Please direct your comments to:

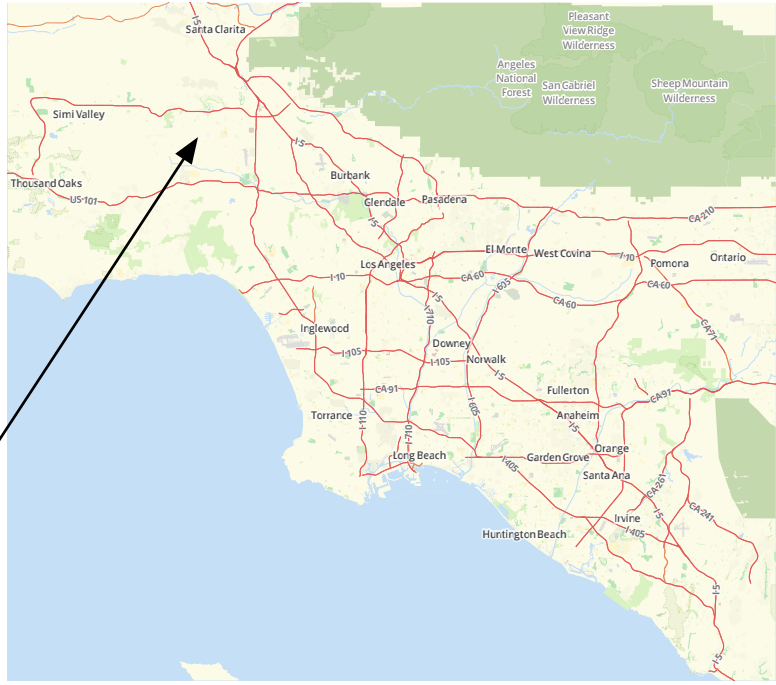
Nick Hendricks  
6262 Van Nuys Blvd., Suite 351  
Van Nuys, CA 91401  
Tel: (818) 374-5046  
E-mail: [nick.hendricks@lacity.org](mailto:nick.hendricks@lacity.org)

Michael J. LoGrande,  
Director of Planning

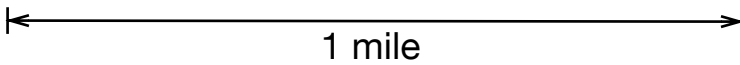
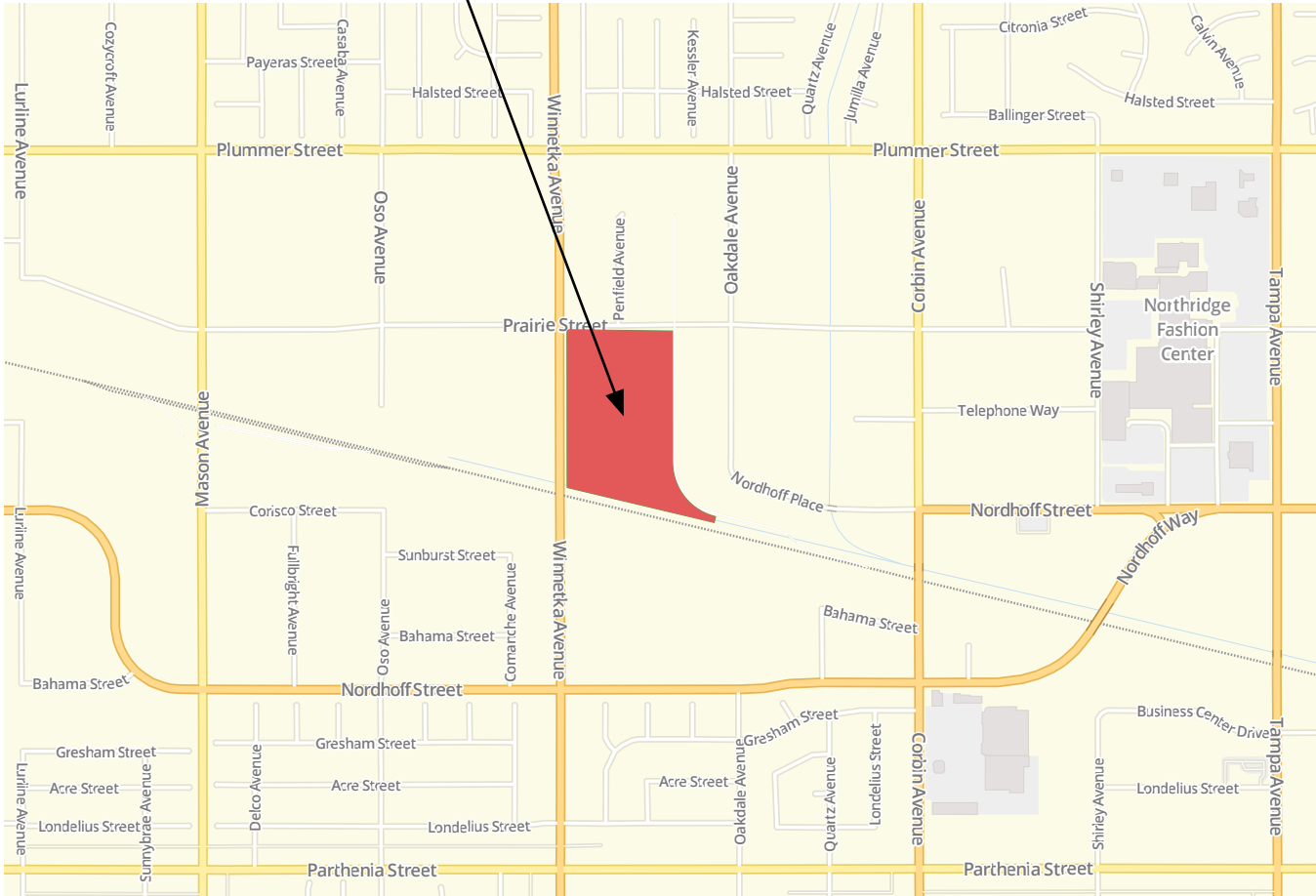


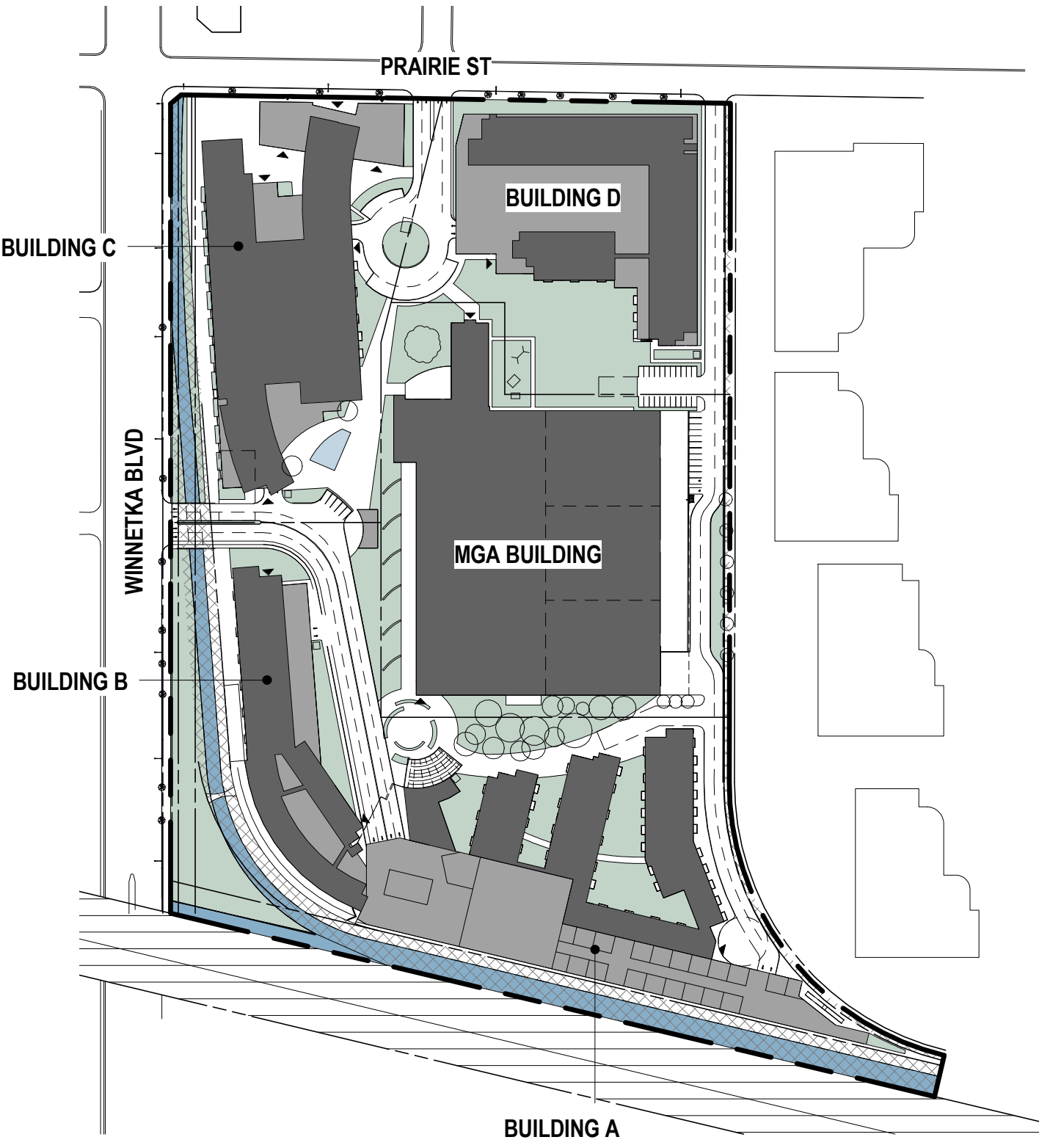
Nick Hendricks,  
Major Projects

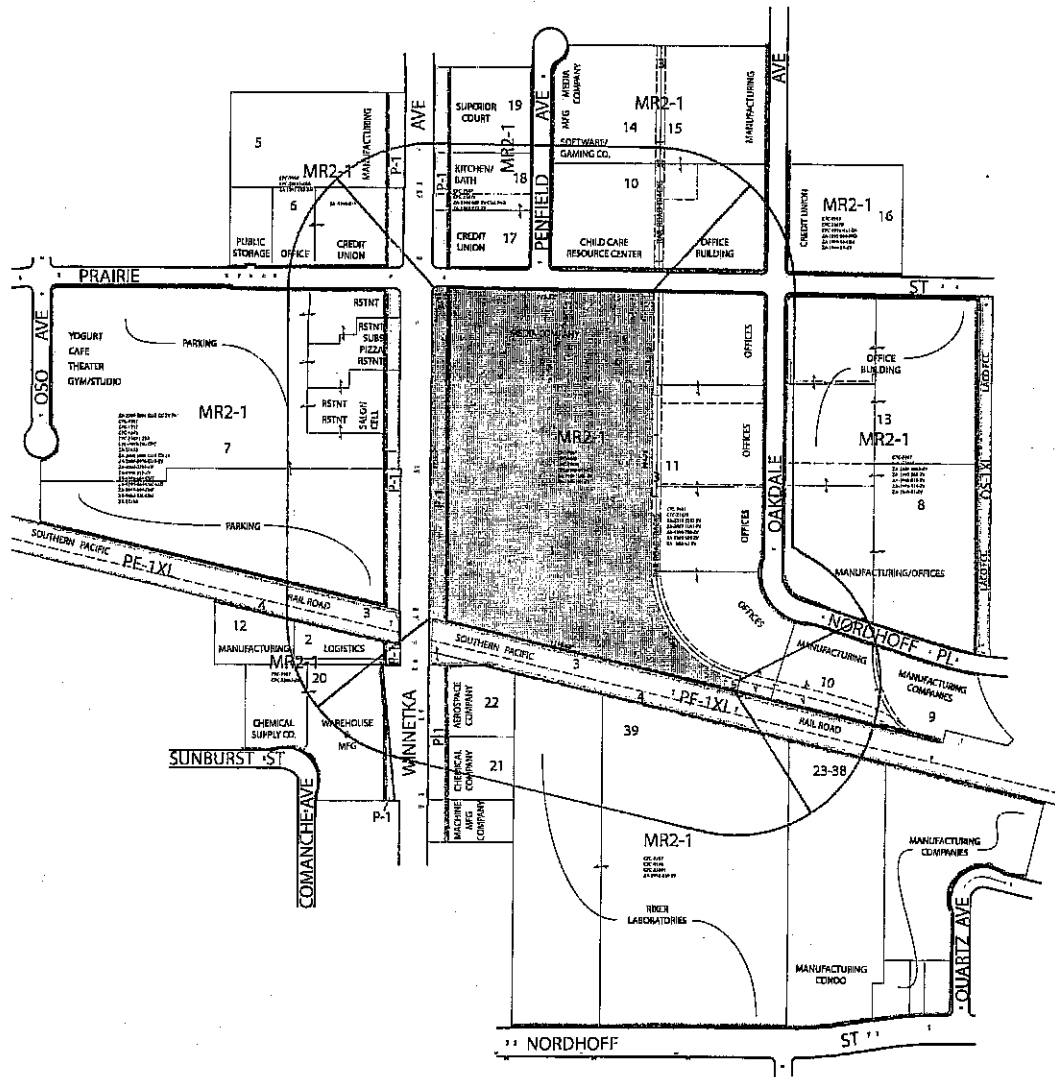
Attachments: Project Location Map, Conceptual Site Plan, 500-ft Radius Map



Project Location







500 Foot Radius Map

GENERAL PLAN AMENDMENT - ZONE CHANGE - CONDITIONAL USE PERMITS  
 MODIFIED PARKING REQUIREMENT DISTRICT - VESTING TENTATIVE TRACT - SITE PLAN REVIEW  
 ENVIRONMENTAL - DEVELOPMENT AGREEMENT

**QMS** Quality Mapping Service  
 14549 Archwood St. Suite 301  
 Van Nuys, California 91405  
 Phone (818) 997-7949 - Fax (818) 997-0351  
 qmapping@qesqms.com

DRAWN BY:

**THOMAS BROTHERS**  
 Page: 500 Grid: E-6  
 E-7

**LEGAL**  
 LOT: POR. 7  
 TRACT: TR 26561  
 M B 931-86-91  
 "SEE APPLICATIONS"

**CONTACT: ARMBRUSTER GOLDSMITH**

**A.P.N.**  
 2761-001-072

**CD: 12**  
**CT: 1133.03**  
**PA: 221 - CHATSWORTH - PORTER RANCH**  
**USES: FIELD**

**SITE ADDRESS**  
 20000 PRAIRIE ST

**CASE NO:**

**SCALE: 1"=200'**

**D.M.: 195B113, 198B113  
 195B117, 198B117**

**PHONE: 310-209-8800**

**DATE: 03-27-14**

**Update:**

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**NET AC: 20.76±**



**QMS:14-004-A**



EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX  
DIRECTOR

**Notice of Preparation**

April 16, 2014

To: Reviewing Agencies  
Re: MGA Mixed-Use Campus Project  
SCH# 2014041066

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

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

Please direct your comments to:

**Nick Hendricks**  
City of Los Angeles  
6262 Van Nuys Boulevard, Suite 351  
Van Nuys, CA 91401

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

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

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Attachments  
cc: Lead Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2014041066  
**Project Title** MGA Mixed-Use Campus Project  
**Lead Agency** Los Angeles, City of

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**Type** **NOP** Notice of Preparation  
**Description** MGA Entertainment, Inc. proposes an integrated light industrial, corporate office and residential mixed-use campus development project (Campus Project) at 20000 W. Prairie Street in the Chatsworth community of the City of Los Angeles (Project Site). The Campus Project will consist of a mix of uses totaling approximately 1.22 million sf, including: (1) adaptive re-use and rehabilitation of the former LA Times printing facility (255,855 sf) for MGA light industrial uses and its corporate headquarters, as well as ancillary creative office space; (2) 700 rental housing units in four main residential buildings (i.e., Buildings A-D); (3) shared recreational campus amenities located throughout the Site; and (4) approximately 14,000 sf of campus and neighborhood serving retail and restaurant uses.

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**Lead Agency Contact**

**Name** Nick Hendricks  
**Agency** City of Los Angeles  
**Phone** 818 374 5046 **Fax**  
**email**  
**Address** 6262 Van Nuys Boulevard, Suite 351  
**City** Van Nuys **State** CA **Zip** 91401

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**Project Location**

**County** Los Angeles  
**City** Los Angeles, City of  
**Region**  
**Cross Streets** Prairie Street and Winnetka Avenue  
**Lat / Long** 34° 14' 14.35" N / 118° 34' 10.24" W  
**Parcel No.** 2761001072  
**Township** **Range** **Section** **Base**

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**Proximity to:**

**Highways** SR 118, 27  
**Airports** No  
**Railways** SPRR  
**Waterways** Unnamed drainages (concrete lined)  
**Schools** Several  
**Land Use** Vacant with some periodic showroom use/MR2-1 and P-1 / Light Industrial

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**Project Issues** Aesthetic/Visual; Air Quality; Biological Resources; Drainage/Absorption; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects

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**Reviewing Agencies** Resources Agency; Office of Historic Preservation; Department of Parks and Recreation; Resources, Recycling and Recovery; Department of Water Resources; Department of Fish and Wildlife, Region 5; Office of Emergency Services, California; Native American Heritage Commission; Public Utilities Commission; State Lands Commission; California Highway Patrol; Caltrans, District 7; Air Resources Board; Regional Water Quality Control Board, Region 4

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**Date Received** 04/16/2014 **Start of Review** 04/16/2014 **End of Review** 05/15/2014





### Notice of Completion & Environmental Document Transmittal

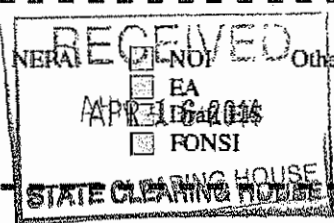
Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613  
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

**2014041066**

**Project Title:** MGA Mixed-Use Campus Project  
**Lead Agency:** City of Los Angeles, Department of City Planning **Contact Person:** Nick Hendricks  
**Mailing Address:** 6262 van Nuys Boulevard, Suite 351 **Phone:** 818-374-5046  
**City:** Van Nuys, California **Zip:** 91401 **County:** Los Angeles

**Project Location:** County: Los Angeles City/Nearest Community: Los Angeles, Chatsworth-Porter ranch  
**Cross Streets:** Prairie Street and Winnetka Avenue **Zip Code:** 91311  
**Longitude/Latitude (degrees, minutes and seconds):** 34 °14 '14.36" N / 118 °34 '10.24" W **Total Acres:** 23.6 acres  
**Assessor's Parcel No.:** 2761001072 **Section:** \_\_\_\_\_ **Twp.:** \_\_\_\_\_ **Range:** \_\_\_\_\_ **Base:** \_\_\_\_\_  
**Within 2 Miles:** State Hwy #: SR 118, SR 27 **Waterways:** Unnamed drainages (concrete lined)  
**Airports:** None **Railways:** SP Railroad **Schools:** Several

**Document Type:**  
CEQA:  NOP  Draft EIR  Joint Document  
 Early Cons  Supplement/Subsequent EIR  Final Document  
 Neg Dec (Prior SCH No.)  Other: \_\_\_\_\_  
 Mit Neg Dec  Other: \_\_\_\_\_



**Local Action Type:**  
 General Plan Update  Specific Plan  Rezone  Annexation  
 General Plan Amendment  Master Plan  Prezone  Redevelopment  
 General Plan Element  Planned Unit Development  Use Permit  Coastal Permit  
 Community Plan  Site Plan  Land Division (Subdivision, etc.)  Other: CUP and other

**Development Type:**  
 Residential: Units 700 Acres \_\_\_\_\_  
 Office: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  
 Commercial: Sq.ft. 14,000 Acres \_\_\_\_\_ Employees 42  
 Industrial: Sq.ft. 256,000 Acres \_\_\_\_\_ Employees 500  
 Educational: p \_\_\_\_\_  
 Recreational: \_\_\_\_\_  
 Water Facilities: Type \_\_\_\_\_ MGD \_\_\_\_\_  
 Transportation: Type \_\_\_\_\_  
 Mining: Mineral \_\_\_\_\_  
 Power: Type \_\_\_\_\_ MW \_\_\_\_\_  
 Waste Treatment: Type \_\_\_\_\_ MGD \_\_\_\_\_  
 Hazardous Waste: Type \_\_\_\_\_  
 Other: \_\_\_\_\_

**Project Issues Discussed in Document:**  
 Aesthetic/Visual  Fiscal  Recreation/Parks  Vegetation  
 Agricultural Land  Flood Plain/Flooding  Schools/Universities  Water Quality  
 Air Quality  Forest Land/Fire Hazard  Septic Systems  Water Supply/Groundwater  
 Archeological/Historical  Geologic/Seismic  Sewer Capacity  Wetland/Riparian  
 Biological Resources  Minerals  Soil Erosion/Compaction/Grading  Growth Inducement  
 Coastal Zone  Noise  Solid Waste  Land Use  
 Drainage/Absorption  Population/Housing Balance  Toxic/Hazardous  Cumulative Effects  
 Economic/Jobs  Public Services/Facilities  Traffic/Circulation  Other: \_\_\_\_\_

**Present Land Use/Zoning/General Plan Designation:**  
Vacant with some periodic showroom use/ MR2-1 and P-1/Light Industrial  
**Project Description:** (please use a separate page if necessary)

See Attachment I.

**Reviewing Agencies Checklist**

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X". If you have already sent your document to the agency please denote that with an "S".

- Air Resources Board
- Boating & Waterways, Department of
- California Emergency Management Agency
- California Highway Patrol
- Caltrans District #7
- Caltrans Division of Aeronautics
- Caltrans Planning
- Central Valley Flood Protection Board
- Coachella Valley Mtns. Conservancy
- Coastal Commission
- Colorado River Board
- Conservation, Department of
- Corrections, Department of
- Delta Protection Commission
- Education, Department of
- Energy Commission
- Fish & Game Region #5
- Food & Agriculture, Department of
- Forestry and Fire Protection, Department of
- General Services, Department of
- Health Services, Department of
- Housing & Community Development
- Native American Heritage Commission

- Office of Historic Preservation
- Office of Public School Construction
- Parks & Recreation, Department of
- Pesticide Regulation, Department of
- Public Utilities Commission
- Regional WQCB #4
- Resources Agency
- Resources Recycling and Recovery, Department of
- S.F. Bay Conservation & Development Comm.
- San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
- San Joaquin River Conservancy
- Santa Monica Mtns. Conservancy
- State Lands Commission
- SWRCB: Clean Water Grants
- SWRCB: Water Quality
- SWRCB: Water Rights
- Tahoe Regional Planning Agency
- Toxic Substances Control, Department of
- Water Resources, Department of
- Other: \_\_\_\_\_
- Other: \_\_\_\_\_

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**Local Public Review Period (to be filled in by lead agency)**

Starting Date April 17, 2014 Ending Date May 16, 2014

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**Lead Agency (Complete if applicable):**

Consulting Firm: Environmental Planning Associates  
 Address: 3734 Mandeville Canyon Road  
 City/State/Zip: Los Angeles, CA 90049  
 Contact: Jim Brock  
 Phone: 310-471-0541

Applicant: MGA North, LLC  
 Address: 16380 Roscoe Boulevard  
 City/State/Zip: NVan Nuys, CA 91406  
 Phone: 310-288-3255

-----  
 Signature of Lead Agency Representative: *Nicholas Henderson* Date: April 2, 2014

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

## Attachment I

MGA Entertainment, Inc. (the Applicant) proposes an integrated light industrial, corporate office and residential mixed-use campus development project (Campus Project) at 20000 W. Prairie Street in the Chatsworth community of the City of Los Angeles (Project Site). The Campus Project will consist of a mix of uses totaling approximately 1.22 million square feet, including: (1) adaptive re-use and rehabilitation of the former LA Times printing facility (255,855 square feet) for MGA light industrial uses and its corporate headquarters, as well as ancillary creative office space; (2) 700 rental housing units in four main residential buildings (i.e., Buildings A-D); (3) shared recreational campus amenities located throughout the Site; and (4) approximately 14,000 square feet of campus and neighborhood serving retail and restaurant uses.

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The Project Applicant is requesting the following approvals from the City of Los Angeles: This EIR addresses the environmental impacts of the proposed project that could occur upon approval of the following actions by the City of Los Angeles: 1) General Plan Amendment pursuant to LAMC Section 12.32 E to revise the land use designation in the Chatsworth-Porter Ranch Community Plan from Light Industrial to Community Manufacturing for the entire subject site; 2) Vesting Tract Map pursuant to LAMC Section 17.50 to subdivide the Site into five or more legal lots; 3) Zone change (from MR2-1 and P-1 to CM-1) pursuant to LAMC Section 12.32 F to allow a mix of uses including light industrial, corporate office, residential and neighborhood serving retail and restaurant; 4) Conditional Use Permit (CUP) pursuant to LAMC Section 12.24 to permit a unified development (blended FAR and density across 4 ground parcels (LAMC Section 12.24W.19), on-site childcare in the CM zone (LAMC Section 12.24W.51, and sale of alcoholic beverages (LAMC Section 12.24W.1); 5) Site Plan Review (LAMC Section 16.05); 6) pursuant to various sections of Los Angeles Municipal Code, the Applicant will request approvals and permits from the Building and Safety Department (and other municipal agencies) for project construction activities including, but not limited to the following: demolition, excavation, shoring, grading, foundation, haul route, building and tenant improvements; 7) Permits as needed to cross the City-owned flood control channel to provide access from Winnetka Avenue; 8) Water Supply Assessment approval from Los Angeles Department of Water and Power (LADWP); 9) Zoning Administrator Determination to allow Modified Parking Requirement District to establish special parking ratios and to permit shared parking for commercial and residential uses (LAMC Section 13.15); and 10) potential Development Agreement with the City of Los Angeles.

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7, 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!*

May 15, 2014

Mr. Nick Hendricks  
City of Los Angeles  
6262 Van Nuys Boulevard, Suite 351  
Van Nuys, CA 91401

IGR/CEQA No. 140441AL-NOP  
MGA Mixed-Use Campus Project  
Vic. LA-118 / PM R4.46, LA-27 / PM R17.52  
SCH # 2014041066

Dear Mr. Hendricks:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The applicant proposes an integrated light industrial, corporate office and residential mixed-use campus development project (Campus Project) at 20000 W. Prairie Street in the Chatsworth community of the City of Los Angeles (Project Site). The Campus Project will consist of a mix of uses totaling approximately 1.22 million square feet, including: (1) adaptive re-use and rehabilitation of the former LA Times printing facility (255,855 square feet) for MGA light industrial uses and its corporate headquarters, as well as ancillary creative office space; (2) 700 rental housing units in four main residential buildings (3) shared recreational campus amenities located throughout the Site; and (4) approximately 14,000 square feet of campus and neighborhood serving retail and restaurant uses.

As owner/operator of the State Highway System (SHS), Caltrans has legislatively mandated stewardship responsibilities for the SHS and is committed to maintaining its operational integrity. The California Environmental Quality Act (CEQA) (Public Resources Code [PRC] sections 21000-21177) and the California Code of Regulations, Title 14, section 15000-15387 (Guidelines) established procedures that enable Caltrans to participate in identifying potential impacts of proposed local project development to the SHS along with mitigation measures to alleviate those impacts.

Los Angeles Department of Transportation's Traffic Study Policies and Procedures use Congestion Management Program (CMP) to analyze the SHS. Based on past experience, traffic studies that use CMP criteria do not provide an adequate traffic impact analysis or mitigation on the SHS. Further, the CMP analysis may not include site-specific safety considerations, or may not be based on an appropriate measure of effectiveness for site-specific considerations. Therefore, Caltrans is requesting a separate or supplemental traffic impact study.

To assist in evaluating the impacts of this project on State transportation facilities, an adequate traffic analysis with substantial evidence to support the study results should be prepared prior to preparing the Draft Environmental Impact Report (DEIR). The City should refer the project's traffic consultant to Caltrans' Guide for the Preparation of Traffic Impact Studies (Traffic Study Guide), located at the following Website:

[http://www.dot.ca.gov/hq/tpp/offices/ocp/igr\\_ceqa\\_files/tisguide.pdf](http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf)

Listed below are some elements of what is expected 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 intersections on SR-27 (Topanga Canyon Blvd.) at Plummer, at Nordhoff St., and at Parthenia St.; and SR-118 and on/off ramps at Topanga Canyon Blvd. (Exit #34), De Soto Ave. (Exit #35), Winnetka Ave. (Exit #36), Tampa Ave. (Exit #37), and Reseda Blvd. (Exist #38); and I-405 and on/off ramps at Nordhoff St. (Exit #69) and Devonshire St. (Exist #70). Caltrans has concerns about queuing of vehicles using off-ramps that will back onto the mainline through lanes. Caltrans recommends that the City use the HCM forecast 85<sup>th</sup> percentile queue for the off-ramp analysis in the Synchro Analysis. Caltrans also recommends that the City determine whether project-related plus cumulative traffic is expected to cause long queues on the on and off-ramps. Caltrans also requests that the City traffic engineers confirm the adequacy of the identified study locations and traffic model assumptions and results on the State facilities with Caltrans before preparing the Environmental Impact Report (EIR).
2. All freeway segments and interchanges within 5 miles of the project should be analyzed if select zone analysis is not used.
3. Consistency of project travel modeling with other regional and local modeling forecasts and with travel data. Caltrans uses indices to verify the results and any differences or inconsistencies must be thoroughly explained.
4. Analysis of ADT, AM and PM peak-hour volumes for both the existing and future conditions in the affected area. Utilization of transit lines and vehicles, and of all facilities, should be realistically estimated. Future conditions should include build-out of all projects and any plan-horizon years. (see next item)
5. Inclusion of all appropriate traffic volumes. Analysis should include existing traffic, traffic generated by the project, cumulative traffic generated from all specific approved developments in the area, and traffic growth other than from the project and developments.
6. 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 Considerations
  - Implementation Responsibilities, Controls, and Monitoring

Any mitigation involving transit or Transportation Demand Management (TDM) or credit reduction should be justified and the results conservatively estimated.

7. Caltrans will accept fair share contributions toward pre-established or future improvements on the SHS. Please use the following ratio when estimating project equitable share responsibility: additional traffic volume due to project implementation

is divided by the total increase in the traffic volume (see Appendix "B" of the Traffic Study Guide).

Please note that for purposes of determining project share of costs, the number of trips from the project on each traveling segment or element should be 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 zone travel forecast modeling, should be used to disclose how far the traffic impacts extend.

Please be reminded that as the responsible agency under CEQA, Caltrans has authority to determine the required freeway analysis for this project and is responsible for obtaining measures that will off-set project vehicle trip generation that worsens State Highway facilities. CEQA allows Caltrans to develop criteria for evaluating impacts on the facilities that it manages. In addition, the Los Angeles County 2010 Congestion Management Program, Appendix D.4 Study area (Page D-2), states that the Caltrans should be consulted for the analysis of the State facilities. State Routes mentioned in item #1 should be analyzed, preferably using the methods that are in the Caltrans's Traffic Impact Study Guide. To determine the appropriate scope, Caltrans requests that the City perform a select zone model run.

Caltrans welcomes the opportunity to provide consultation regarding the scope and method of analysis to be used when analyzing project impacts to the State facilities. We look forward to reviewing the traffic study and expect to receive a copy from the State Clearinghouse when the DEIR is completed. Should you wish to expedite the review process or receive early feedback from please feel free to send a copy of the DEIR directly to our office.

For ramp screening, the 1,500 vehicle/hour/lane, that is referenced in the Agreement between Caltrans and LADOT (October 2013) for the off-ramp is based on the free-flow speed without any traffic controls, per HCM. However, the capacity for interrupted flow such as signal or stop controlled ramp is reduced. An analysis is needed to determine appropriate ramp capacity since the LOS is based on the ramp capacity. Once the true ramp capacity is determined, screening criteria as per the agreement will be applied. We would like to remind the City that despite of the Agreement with LADOT, per California Environmental Quality Act, cumulative traffic impact and cumulative traffic mitigation must disclose to the public.

If the City has concerns about Caltrans' comments, we would like to extend an invitation to hold a Scoping Meeting between the City and Caltrans to confirm the study area, the methodology to be used for the analysis with the City traffic engineers, and to discuss potential traffic impacts to the State facilities and possible mitigation measures prior to the preparation of the EIR and Traffic Impact Study.

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 14041AL.

Sincerely,



DIANNA WATSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

## NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Boulevard, Suite 100  
West Sacramento, CA 95691  
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Web Site [www.nahc.ca.gov](http://www.nahc.ca.gov)  
Ds\_nahc@pacbell.net  
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April 21, 2014

Mr. Nick Hendricks, City Planning Associate

**City of Los Angeles City Planning Department**

6262 Van Nuys Boulevard, Suite 381  
Van Nuys, CA 91401

Sent by U.S. Mail

No. of Pages: 3

RE: SCH#2014041066 CEQA Notice of Preparation (NOP)n; draft Environmental Impact Report (DEIR) for the **"MGS Mixed-Use Campus Project (Entertainment Industry Corporate, Commercial and Residential Uses);"** located in Chatsworth Area; City of Los Angeles; Los Angeles County, California

Dear Mr. Hendricks

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

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 measures 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 public 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 activity 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  
April 21, 2014**

**Beverly Salazar Folkes**  
1931 Shadybrook Drive  
Thousand Oaks, CA 91362  
folkes9@msn.com  
805 492-7255  
(805) 558-1154 - cell  
folkes9@msn.com

Chumash  
Tataviam  
Fernandeño

**San Fernando Band of Mission Indians**  
John Valenzuela, Chairperson  
P.O. Box 221838  
Newhall, CA 91322  
tsen2u@hotmail.com  
(661) 753-9833 Office  
(760) 885-0955 Cell  
(760) 949-1604 Fax

Fernandeño  
Tataviam  
Serrano  
Vanyume  
Kitanemuk

**Fernandeno Tataviam Band of Mission Indians**  
Larry Ortega, Chairperson  
1019 - 2nd Street, Suite #1  
San Fernando CA 91340  
(818) 837-0794 Office  
  
(818) 837-0796 Fax

Fernandeno  
Tataviam

**Randy Guzman - Folkes**  
4676 Walnut Avenue  
Simi Valley, CA 93063  
ndnRandy@yahoo.com  
(805) 905-1675 - cell  
(805) 520-5915-FAX

Chumash  
Fernandeño  
Tataviam  
Shoshone Paiute  
Yaqui

**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

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

**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 is only applicable for contacting locative Americans with regard to cultural resources for the proposed SCH#2014041066; CEQA Notice of Preparation (NOP) draft Environmental Impact Report (DEIR) for the MGA Mixed-Use Campus Project; located in the Chatsworth Area; City and County of Los Angeles, California**



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



April 23, 2014

Nick Hendricks  
Department of City Planning  
6262 Van Nuys Blvd., Suite 351  
Van Nuys, CA 91401

**Notice of Preparation of a CEQA Document for the  
MGA Mixed-Use Campus Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft CEQA document. Please send the SCAQMD a copy of the 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](http://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](http://www.caleemod.com).

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

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/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](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](http://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](mailto:imacmillan@aqmd.gov) or call me at (909) 396-3244.

Sincerely,



Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

SOUTHERN CALIFORNIA



**ASSOCIATION of GOVERNMENTS**

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Margaret Finlay, Duarte

Energy & Environment  
James Johnson, Long Beach

Transportation  
Keith Millhouse, Ventura County  
Transportation Commission

April 29, 2014

Mr. Nick Hendricks  
Major Projects  
Department of City Planning  
6262 Van Nuys Blvd., Suite 351  
Van Nuys, California 91401  
Telephone: (818) 374-5046  
E-mail: nick.hendricks@lacity.org

**RE: SCAG Comments on the Notice of Preparation of an Environmental Impact Report for the MGA Mixed Use Campus Project [SCAG NO. IGR8003]**

Dear Mr. Hendricks:

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

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including its Sustainable Communities Strategy (SCS) component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.<sup>1</sup> Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has reviewed the Notice of Preparation of an Environmental Impact Report for the MGA Mixed Use Campus Project. The proposed project would include an integrated light industrial, corporate office, and residential mixed-use campus development on a 23.6 acre site located in the Chatsworth Community of the City of Los Angeles. Among the mix of proposed uses, the proposed project would include development of 700 dwelling units in four residential buildings.

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

Sincerely,

Jonathan Nadler,  
Manager, Compliance and Performance Assessment

<sup>1</sup> SB 375 amends CEQA to add Chapter 4.2 Implementation of the Sustainable Communities Strategy, which allows for certain CEQA streamlining for projects consistent with the RTP/SCS. Lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining "consistency" of any future project with the SCS. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a finding of consistency under SB 375 for purposes of CEQA streamlining.

| SCAG 2012 RTP/SCS Goals  |  |
|--|--|
| Goal   | Analysis   |
| RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness.</i> | <i>Consistent: Statement as to why<br/>Not-Consistent: Statement as to why<br/>or<br/>Not Applicable: Statement as to why<br/>DEIR page number reference</i> |
| RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region.</i>                               | <i>Consistent: Statement as to why<br/>Not-Consistent: Statement as to why<br/>or<br/>Not Applicable: Statement as to why<br/>DEIR page number reference</i> |
| etc.   | etc.   |

**RTP/SCS Strategies**

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

**Regional Growth Forecasts**

The Environmental Impact Report for the MGA Mixed Use Campus Project should reflect the most recently adopted SCAG forecasts. To review the most recently adopted SCAG forecasts, please visit <http://scag.ca.gov/Documents/2012AdoptedGrowthForecastPDF.pdf>, which consists of the 2020 and 2035 RTP/SCS population, household and employment forecasts. The forecasts for the region and applicable jurisdictions are below.

| Forecast   | Adopted SCAG Region Wide Forecasts |            | Adopted City of Los Angeles Forecasts |           |
|------------|------------------------------------|------------|---------------------------------------|-----------|
|            | Year 2020                          | Year 2035  | Year 2020                             | Year 2035 |
| Population | 19,663,000                         | 22,091,000 | 3,991,700                             | 4,320,600 |
| Households | 6,458,000                          | 7,325,000  | 1,455,700                             | 1,626,600 |
| Employment | 8,414,000                          | 9,441,000  | 1,817,700                             | 1,906,800 |

**MITIGATION**

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

As referenced in Chapter 6, a comprehensive list of example mitigation measures that may be considered as appropriate is included in Appendix G: *Examples of Measures that Could Reduce Impacts from Planning, Development and Transportation Projects*. Appendix G can be accessed at: [http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR\\_AppendixG\\_ExampleMeasures.pdf](http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR_AppendixG_ExampleMeasures.pdf)



**Metro**

Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

May 16, 2014

Nick Hendricks, Major Projects  
City of Los Angeles Planning Department  
6262 Van Nuys Boulevard, Suite 351  
Van Nuys, CA 91401

**RE: MGA Mixed Use Campus Project**

Dear Mr. Hendricks:

The Los Angeles County Metropolitan Transportation Authority (LACMTA) appreciates the opportunity to comment on the proposed MGA Mixed Use Campus Project at 20000 West Prairie Street. In fulfillment of our statutory obligation, this letter conveys recommendations pertaining to the proposed project and potential impacts it may have on our facilities and services.

It is noted that the southern boundary of the project site is adjacent to an LACMTA-owned Railroad Right-of-Way (ROW). This ROW is used by Metrolink for commuter passenger rail. The following concerns related to the project's proximity to the ROW should be addressed:

1. The project sponsor is advised that rail service operates in both directions and that trains may operate, in and out of revenue service, 24 hours a day, seven days a week, in the ROW adjacent to the proposed project.
2. Considering the proximity of the proposed project to the railroad ROW, trains will produce noise, vibration and visual impacts. A recorded Noise Easement Deed in favor of LACMTA is required, a form of which is attached. The easement recorded in the Deed will extend to successors and tenants, as well. In addition, any noise mitigation required for the project will be borne by the developers of the project and not LACMTA or the operating railroads.
3. There shall be no encroachment onto the railroad ROW. Any future work performed on the proposed project's structures or property requiring access to the railroad ROW, shall be covered by specific Right-of-Entry permits with specific requirements. These may include permits for construction of buildings, and any future repairs, painting, graffiti removal, etc, including the use of overhead cranes or any other equipment that could potentially impact railroad operations and safety. Frequent access for maintenance tasks such as graffiti removal, will necessitate an active license agreement. This agreement will include an annual license fee, and other requirements that meet safety standards for access to a ROW with active rail operations.
4. During construction, a protection barrier shall be constructed to prevent objects, material, or debris from falling onto the ROW.
5. The project sponsor will be required to notify LACMTA of any changes to the construction/building plans that may or may not impact the ROW.
6. LACMTA staff shall be permitted to monitor construction activity to ascertain any impact to the ROW.
7. There are at-grade crossings located on Winnetka Boulevard and Corbin Avenue, adjacent and proximate to the proposed project. The development of this property which includes a

driveway on Winnetka Boulevard may increase traffic volumes across both at-grade crossings, especially the Winnetka Boulevard crossing, that could potentially impact the safety of the crossings. These traffic and safety impacts should be analyzed. These crossings are regulated by the California Public Utilities Commission (CPUC). The CPUC may have additional comments regarding this development.

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

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

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

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

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

Sincerely,



Nick Saponara  
Development Review Manager, Countywide Planning

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



## 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.

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**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.