

CHAPTER II

Responses to Comments

1. Introduction

Section 15088(a) of the State California Environmental Quality Act (CEQA) Guidelines states that “The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The Lead Agency shall respond to comments that were received during the noticed comment period and any extensions and may respond to late comments.” In accordance with these requirements, this Chapter of this Final Environmental Impact Report (EIR) provides responses to each of the written comments on the Draft EIR received during the public comment period. **Table II-1, Comments Received in Response to the Draft EIR**, provides a list of the comment letters received and a summary of the issues that were raised in comments on the Draft EIR.

Chapter 2, Responses to Comments, presents comments submitted during the public comment period for the Draft EIR from State and County agencies, as well as from individuals and organizations as listed on Table II-1. The letters have been organized based on affiliation (i.e., agency, organization, or individual) of the commenter, as indicated in **Table II-1**. Each comment that requires a response within the letters is also assigned a number. For example, the first State Agency (Letter A1) listed is the State of California, Office of Planning and Research, and is therefore designated Comment Letter No. A1. The first comment is therefore labeled Comment No. A1-1 and the responses to each comment are correspondingly numbered, (i.e., Response to Comment No. A1-1). A copy of each comment letter is provided in **Appendix A**, Original Comment Letters, of this Final EIR.

As required by the State CEQA Guidelines, Section 15088 (c), the focus of the responses to comments is “the disposition of significant environmental issues raised.” Therefore, detailed responses are not provided to comments that do not relate to relevant environmental issues. However, in some cases, additional information has been added for reference and clarity.

A total of five agencies, two organizations, and two individuals provided comments and/or letters during the circulation period for the Draft EIR. In addition, 48 individuals submitted a form letter in support of the Project via the '*EveryAction Advocacy*' on-line utility. This section includes copies of the letters and/or comments received, with the responses to the comments raised immediately following each letter.

**Table II-1
Matrix of Comments Received in Response to the Draft EIR**

Letter No	Commenter	Project Description	Environmental Setting	Impacts Less than Significant	Air Quality	Greenhouse Gas Emissions	Land Use Planning	Noise	Population and Housing	Fire Protection	Police Protection	Schools	Libraries	Recreation	Transportation and Traffic	Wastewater	Water	Solid Waste	Energy	General Impact Categories	Alternatives	General/Other	Support
State and Regional Agencies																							
A 1	State of California Office of Planning and Research State Clearinghouse Scott Morgan, Director 1400 Tenth Street P.O. Box 3044 Sacramento, CA 95812-3044 (February 12, 2019)																					X	
A 2	California Department of Transportation, District 7 IGR/CEQA 100 Main St. MS #16 Los Angeles CA 90012-3606 (February 5, 2019)														X								

Letter No	Commenter	Project Description	Environmental Setting	Impacts Less than Significant	Air Quality	Greenhouse Gas Emissions	Land Use Planning	Noise	Population and Housing	Fire Protection	Police Protection	Schools	Libraries	Recreation	Transportation and Traffic	Wastewater	Water	Solid Waste	Energy	General impact Categories	Alternatives	General/Other	Support
A 3	State Department of Toxic Substances Control Meredith Williams, PhD., Acting Director 9211 Oakdale Avenue Chatsworth, CA 91311 (January 18, 2019)																					X	
A 4	LA Metro Georgia Sheridan, AICP Senior Manager One Gateway Plaza LA, CA 90012 (February 1, 2019)														X								
A 5	Los Angeles County Public Works Toan Duong, Civil Engineer tduong@dpw.lacounty.gov (February 11, 2019)														X							X	

Letter No	Commenter	Project Description	Environmental Setting	Impacts Less than Significant	Air Quality	Greenhouse Gas Emissions	Land Use Planning	Noise	Population and Housing	Fire Protection	Police Protection	Schools	Libraries	Recreation	Transportation and Traffic	Wastewater	Water	Solid Waste	Energy	General impact Categories	Alternatives	General/Other	Support
Organizations																							
O 1	Lozeau Drury LLP Richard Drury 410 12th Street, Suite 250 Oakland, CA 94607 (February 1, 2019)																					X	
O 2	South Brentwood Residents Association 149 S. Barrington Ave. # 194 LA, CA 90049 (January 21, 2019)																				X	X	X

Letter No	Commenter	Project Description	Environmental Setting	Impacts Less than Significant	Air Quality	Greenhouse Gas Emissions	Land Use Planning	Noise	Population and Housing	Fire Protection	Police Protection	Schools	Libraries	Recreation	Transportation and Traffic	Wastewater	Water	Solid Waste	Energy	General Impact Categories	Alternatives	General/Other	Support
Individuals																							
I 1	Jian Kerendian 1756 Barry Avenue LA, CA 90025 (January 1, 2019)														X								
I 2	Jay Ross ross_jay@hotmail.com (December 29, 2018)													X	X							X	
I 3	Alex Chen aznyellojersey@gmail.com (January 15, 2019)																						X
I 4	Alex Filler alex.filler@gmail.com (January 14, 2019)																						X
I 5	Andrew May andymay@yahoo.com (January 15, 2019)																						X

Letter No	Commenter	Project Description	Environmental Setting	Impacts Less than Significant	Air Quality	Greenhouse Gas Emissions	Land Use Planning	Noise	Population and Housing	Fire Protection	Police Protection	Schools	Libraries	Recreation	Transportation and Traffic	Wastewater	Water	Solid Waste	Energy	General Impact Categories	Alternatives	General/Other	Support
I 6	Andy Freeland andy@andyfreeland.net (January 14, 2019)																						X
I 7	Angus Beverly beverly2018@lawnet.ucla.edu (January 14, 2019)																						X
I 8	Ann Bickerton aebickerton@gmail.com (January 15, 2019)																						X
I 9	Anthony Santana santana3250@everyactioncustom.com (January 15, 2019)																						X

Letter No	Commenter	Project Description	Environmental Setting	Impacts Less than Significant	Air Quality	Greenhouse Gas Emissions	Land Use Planning	Noise	Population and Housing	Fire Protection	Police Protection	Schools	Libraries	Recreation	Transportation and Traffic	Wastewater	Water	Solid Waste	Energy	General impact Categories	Alternatives	General/Other	Support
I 10	Ariel Simons alsimons@everyactioncustom.com (January 14, 2019)																						X
I 11	Carie Povar cariebottomline@everyactioncustom.com (January 14, 2019)																						X
I 12	Chelsea Byers chelsea@everyactioncustom.com (January 15, 2019)																						X
I 13	Colin Frederick Colin.Frederick123@everyactioncustom.com (January 14, 2019)																						X

Letter No	Commenter	Project Description	Environmental Setting	Impacts Less than Significant	Air Quality	Greenhouse Gas Emissions	Land Use Planning	Noise	Population and Housing	Fire Protection	Police Protection	Schools	Libraries	Recreation	Transportation and Traffic	Wastewater	Water	Solid Waste	Energy	General impact Categories	Alternatives	General/Other	Support
I 14	Craig Lyn craig@everyactioncustom.com (January 14, 2019)																						X
I 15	David Barboza dejaybe@everyactioncustom.com (January 15, 2019)																						X
I 16	David Perel davidperel@everyactioncustom.com (January 14, 2019)																						X
I 17	Debbie Peters deborahapeters@everyactioncustom.com (January 14, 2019)																						X

Letter No	Commenter	Project Description	Environmental Setting	Impacts Less than Significant	Air Quality	Greenhouse Gas Emissions	Land Use Planning	Noise	Population and Housing	Fire Protection	Police Protection	Schools	Libraries	Recreation	Transportation and Traffic	Wastewater	Water	Solid Waste	Energy	General impact Categories	Alternatives	General/Other	Support
I 18	Derek Sanders derekjsanders@everyactioncustom.com (January 14, 2019)																						X
I 19	Eddie Isaacs isaacs_e@everyactioncustom.com (January 17, 2019)																						X
I 20	Edwin Woll e.woll@everyactioncustom.com (January 14, 2019)																						X
I 21	Ethan Stanislawski ethan@everyactioncustom.com (January 14, 2019)																						X

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I 22	Felix Knutson knutson.93@everyactioncustom.com (January 14, 2019)																						X
I 23	Gary Benjamin gary.ray.benjamin@everyactioncustom.com (January 15, 2019)																						X
I 24	Greg Porter gport333@everyactioncustom.com (January 14, 2019)																						X
I 25	Gregory Dina gregdina@everyactioncustom.com (January 14, 2019)																						X

Letter No	Commenter	Project Description	Environmental Setting	Impacts Less than Significant	Air Quality	Greenhouse Gas Emissions	Land Use Planning	Noise	Population and Housing	Fire Protection	Police Protection	Schools	Libraries	Recreation	Transportation and Traffic	Wastewater	Water	Solid Waste	Energy	General Impact Categories	Alternatives	General/Other	Support
I 26	Jake Malott jake@everyactioncustom.com (January 18, 2019)																						X
I 27	Jamison Bradley jsbradley523@everyactioncustom.com (January 14, 2019)																						X
I 28	Joshua Blumenkopf jblumenkopf@everyactioncustom.com (January 14, 2019)																						X
I 29	Joshua Gray-Emmer dtlajosh@everyactioncustom.com (January 14, 2019)																						X

Letter No	Commenter	Project Description	Environmental Setting	Impacts Less than Significant	Air Quality	Greenhouse Gas Emissions	Land Use Planning	Noise	Population and Housing	Fire Protection	Police Protection	Schools	Libraries	Recreation	Transportation and Traffic	Wastewater	Water	Solid Waste	Energy	General impact Categories	Alternatives	General/Other	Support
I 30	Judd Schoenholtz judd@everyactioncustom.com (January 14, 2019)																						X
I 31	Karherine Martinez china_kathy@everyactioncustom.com (January 14, 2019)																						X
I 32	Leonora Camner leonorasc@everyactioncustom.com (January 14, 2019)																						X
I 33	Liz Barrillas trunkschan90@everyactioncustom.com (January 14, 2019)																						X

Letter No	Commenter	Project Description	Environmental Setting	Impacts Less than Significant	Air Quality	Greenhouse Gas Emissions	Land Use Planning	Noise	Population and Housing	Fire Protection	Police Protection	Schools	Libraries	Recreation	Transportation and Traffic	Wastewater	Water	Solid Waste	Energy	General impact Categories	Alternatives	General/Other	Support
I 34	Mark Montiel mrkmontiel@everyactioncustom.com (January 14, 2019)																						X
I 35	Matt Stauffer stauffermt@everyactioncustom.com (January 14, 2019)																						X
I 36	Matthew Brehove mbrehove@everyactioncustom.com (January 15, 2019)																						X
I 37	Natalya Zernitskaya nzernitskaya@everyactioncustom.com (January 15, 2019)																						X

Letter No	Commenter	Project Description	Environmental Setting	Impacts Less than Significant	Air Quality	Greenhouse Gas Emissions	Land Use Planning	Noise	Population and Housing	Fire Protection	Police Protection	Schools	Libraries	Recreation	Transportation and Traffic	Wastewater	Water	Solid Waste	Energy	General impact Categories	Alternatives	General/Other	Support
I 38	Partho Kalyani parthokalyani@everyactioncustom.com (January 14, 2019)																						X
I 39	Paul Moorman pmoorman@everyactioncustom.com (January 14, 2019)																						X
I 40	Paul Moses pauldmoses@everyactioncustom.com (January 14, 2019)																						X
I 41	Peter Tuite peteruite@everyactioncustom.com (January 14, 2019)																						X

Letter No	Commenter	Project Description	Environmental Setting	Impacts Less than Significant	Air Quality	Greenhouse Gas Emissions	Land Use Planning	Noise	Population and Housing	Fire Protection	Police Protection	Schools	Libraries	Recreation	Transportation and Traffic	Wastewater	Water	Solid Waste	Energy	General impact Categories	Alternatives	General/Other	Support
I 42	Prabhu Reddy prabhu.r.reddy@everyactioncustom.com (January 14, 2019)																						X
I 43	Ryan Bostic rabostic@everyactioncustom.com (January 14, 2019)																						X
I 44	Ryan Welch ry@everyactioncustom.com (January 14, 2019)																						X
I 45	Stanley Johnson stjohnso@everyactioncustom.com (January 14, 2019)																						X

Letter No	Commenter	Project Description	Environmental Setting	Impacts Less than Significant	Air Quality	Greenhouse Gas Emissions	Land Use Planning	Noise	Population and Housing	Fire Protection	Police Protection	Schools	Libraries	Recreation	Transportation and Traffic	Wastewater	Water	Solid Waste	Energy	General Impact Categories	Alternatives	General/Other	Support
I 46	Steven Guerry steven.guerry@everyactioncustom.com (January 14, 2019)																						X
I 47	Steven Somers stevensomers@everyactioncustom.com (January 14, 2019)																						X
I 48	Tami Kagan-Abrams tami@everyactioncustom.com (January 14, 2019)																						X
I 49	Virginia Postrel vp@everyactioncustom.com (January 14, 2019)																						X

Letter No	Commenter	Project Description	Environmental Setting	Impacts Less than Significant	Air Quality	Greenhouse Gas Emissions	Land Use Planning	Noise	Population and Housing	Fire Protection	Police Protection	Schools	Libraries	Recreation	Transportation and Traffic	Wastewater	Water	Solid Waste	Energy	General impact Categories	Alternatives	General/Other	Support
I 50	William Wright willrobwright@everyactioncustom.com (January 14, 2019)																						X

2. Responses to Comments



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

February 12, 2019

RECEIVED
CITY OF LOS ANGELES

FEB 15 2019

MAJOR PROJECTS
UNIT

Milena Zasadzien
City of Los Angeles
221 North Figueroa St, Rm 1350
Los Angeles, CA 90012

Subject: Santa Monica and Barrington Mixed-Use Project
SCH#: 2016051027

Dear Milena Zasadzien:

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 February 11, 2019, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

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

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

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

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

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures

cc: Resources Agency

Comment Letter No. A1

State Clearinghouse
Scott Morgan, Director
1400 10th Street P.O. Box 3044
Sacramento, CA 95812-3044

February 12, 2019

Response to Comment No. A1-1

This comment acknowledges receipt of the Draft EIR by the State Clearinghouse and that circulation of the Draft EIR to selected State agencies has occurred through the State Clearinghouse; two comment letters received from the notified state agencies were attached, one from the California Department of Transportation (Caltrans) and the other from the Department of Toxic Substances Control (DTSC). This comment letter documents that the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act, have been met for the Project. However, it does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA.

The comment is acknowledged for the record and will be forwarded to the decision makers for their review and consideration.

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, OFFICE OF REGIONAL PLANNING

IGR/CEQA BRANCH

100 MAIN STREET, MS # 16

LOS ANGELES, CA 90012-3606

PHONE: (213) 897-6536

FAX: (213) 897-1337

Letter A2*Making Conservation a**California Way of Life!*February 5th, 2019

Milena Zasadzien

City of Los Angeles, Department of City Planning

221 N. Figueroa Street Suite 1350

Los Angeles, CA 90012

Re: Santa Monica – Barrington**Mixed-Use Project**

SCH# 2016051027

GTS# 07-LA-2016-02138TD-DEIR

Dear Milena Zasadzien:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Project includes the construction & operation of a five-story 316,520 sf mixed use development, comprised of 64,759 sf of ground-floor and mezzanine-level grocery store and restaurant uses along Santa Monica Blvd and 180 residential apartments (20 of which would be set aside of Very Low Income households), over three levels of subterranean parking (up to 40 ft in depth), on a 2.6-acre (114,563 sf) vacant site. The project would be a max of 62 ft in building height, with a max FAR of 3:1. The project would include the installation of rooftop-mounted cellular antennas on 8-ft poles with supporting equipment cabinets. Excavation activities would result in the export of 152,000 cy of soil.

Caltrans has reviewed the Draft Environmental Impact Report and has prepared the following comment:

- Caltrans supports the implementation of mitigation measure TRA-2 (a). This mitigation measure states:
 - Monitoring traffic camera equipment will be installed at:
 - Barrington Avenue and Santa Monica Boulevard
 - Bundy Drive and Santa Monica Boulevard
 - Centinela Avenue and Santa Monica Boulevard
 - Santa Monica Boulevard and Sawtelle Boulevard

In the spirit of cooperation, Caltrans staff is available to work with your planners and traffic engineers for this project, if needed. If you have any questions regarding these comments, please contact project coordinator Mr. Todd Davis, at (213) 897-0067 and refer to GTS# 07-LA-2016-02138TD.

Sincerely,


MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

RECEIVED
CITY OF LOS ANGELES**FEB 12 2019****MAJOR PROJECTS
UNIT**

Comment Letter No. A2

Department of Transportation
District 7, Office of Regional Planning
Miya Edmonson, IGR/CEQA Branch Chief
100 Main Street, MS # 16
Los Angeles, CA 90012-3606

February 5, 2019

Response to Comment No. A2-1

The comment states that the agency supports the implementation of mitigation measure MM-TRA-2(a) for the proposed project, which requires the installation of traffic monitoring equipment at four intersections, but does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA.

The comment is acknowledged for the record and will be forwarded to the decision makers for their review and consideration.



Department of Toxic Substances Control



Jared Blumenfeld
Secretary for
Environmental Protection

Meredith Williams, Ph.D.
Acting Director
9211 Oakdale Avenue
Chatsworth, California 91311

Gavin Newsom
Governor

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Governor's Office of Planning & Research

January 18, 2019

JAN 25 2019

Si ATE CLEARINGHOUSE

Milena Zasadzien
Department of City Planning
221 N. Figueroa Street Suite 1350
Los Angeles, CA 90012

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR
THE SANTA MONICA AND BARRINGTON MIXED-USE PROJECT (PROJECT)

Dear Ms. Zasadzien:

The Department of Toxic Substances Control (DTSC) has received the document for
the above-mentioned project.

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

- 1) The document needs to identify and determine whether current or historic uses at
the project site have resulted in any release of hazardous wastes/substances at the
project area.
- 2) The document needs to identify any known or potentially contaminated site within
the proposed project area. For all identified sites, the document needs to evaluate
whether conditions at the site pose a threat to human health or the environment.
- 3) The document should identify the mechanism to initiate any required investigation
and/or remediation for any site that may require remediation, and which government
agency will provide appropriate regulatory oversight.
- 4) 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 soil exists, the document should
identify how any required investigation or remediation will be conducted, and which
government agency will provide appropriate regulatory oversight.

Milena Zasadzien
January 18, 2019
Page 2

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) 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 me at (818) 717-6555 or Pete.Cooke@dtsc.ca.gov.

1

Sincerely,



Pete Cooke
Site Mitigation and Restoration Program - Chatsworth Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Dave Kereazis
Hazardous Waste Management Program, Permitting Division
CEQA Tracking
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Comment Letter No. A3

Department of Toxic Substances Control
Meredith Williams, Ph.D. Acting Director
9211 Oakdale Avenue
Chatsworth, California 91311

January 18, 2019

Response to Comment No. A3-1

The comment states that the document needs to identify and determine whether current or historic uses at the project site have resulted in any release of hazardous wastes/substances at the project area; whether there are any known or potentially contaminated sites within the proposed project area; to identify the mechanism to initiate any needed investigations or remediation; and if contaminated soil is encountered during construction, that appropriate health and safety procedures and remediation be implemented. The comment does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA.

Notwithstanding the above, the following response is included for the record:

A Phase I Environmental Site Assessment (ESA) was completed for the project site by All Appropriate Inquiries Environmental Corporation in 2014, and was included as Appendix IV.A-3 to the Draft EIR; the Phase I ESA did not reveal high concentration levels of contaminants of concern (CoCs) in the soil or groundwater on the project site. Neither is the site a Hazardous Waste / Border Zone Property, nor is it within a Methane Hazard zone.¹

As discussed in the Phase I ESA, a search of the NETROnline Environmental Records Database² revealed that the site was listed as a CA Spills, Leaks, Investigations, and Cleanup site. In 2002 the project site was identified as an open-active assessment site by the State Water Resources Control Board (SWRCB). Two (2) 550-gallon

¹ City of Los Angeles Department Of City Planning, *Zoning/Property Info (ZIMAS)*, <http://zimas.lacity.org/>, accessed December 14, 2015.

² The Nationwide Environmental Title Research (NETROnline) Environmental Records Database is a comprehensive environmental database containing thousands of environmental records collected from various local, state and federal organizations. The site can be accessed at: <http://www.netronline.com/>.

underground storage tanks (USTs) associated with a historic gas station constructed in 1937 were identified in a Phase I ESA conducted by Kleinfelder (included as Appendix IV.A-3 to the Draft EIR), located in the northwest portion of the project site. Kleinfelder identified no records of tank removal activities; however, subsequent to the Phase I ESA identifying the USTs, Kleinfelder conducted a geophysical survey of the subject property. The geophysical survey did not reveal any anomalies that were indicative of the presence of USTs on-site. Concentrations of volatile organic chemicals (VOCs) were below detection limits in analyses of soil and groundwater samples from borings (KA-1, KA-2, and KA-3) conducted at this portion of the subject site in a Phase II ESA 2002 investigation conducted by Kleinfelder (included as Appendix IV.A-3 to the Draft EIR).

No further evidence of other aboveground storage tanks (ASTs) and/or USTs was observed or noted at the subject property. No underground storage tanks are registered for the subject property. A work plan was completed in 2011 and the RWQCB issued a no further action determination in 2012.

No structures are located on the project site. Thus, exposure to asbestos containing materials and/or lead-based paints would not occur during demolition of the existing paving on the project site.

Therefore, as evidenced in the EIR, no impacts in regards to hazards or hazardous materials are expected, and therefore impacts would be less than significant.

The comment is acknowledged for the record and will be forwarded to the decision makers for their review and consideration.


Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

February 1, 2019

Milena Zasadzien
Department of City Planning
City of Los Angeles
221 N Figueroa Street Suite 1350
Los Angeles, CA, 90012

RE: Santa Monica – Barrington Mixed-Use Project – Notice of Completion and Availability of Draft Environmental Impact Report (EIR)

Dear Ms.Zasadzien:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Santa Monica – Barrington Mixed-Use (Project) located at 11650-11674 W Santa Monica Boulevard, 1551 S Barry Avenue, 1601 S Barry Avenue, 1560 S Barrington Avenue in the City of Los Angeles (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

The purpose of this letter is to briefly describe the proposed Project, based on the Notice of Completion and Availability of Draft EIR, and to outline recommendations from Metro concerning issues that are germane to our agency's statutory responsibility in relation to the Metro 4 and 704 facilities and services, which may be affected by the proposed Project. In addition to the specific comments outlined below, Metro would like to provide the Project Sponsor with two resources: 1) the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro-owned right-of-way (ROW) and 2) the Adjacent Construction Manual with technical information (also attached). These documents and additional resources are available at www.metro.net/projects/devreview/.

Project Description

The proposed development is a five-story building with a mix of uses, including: ground floor and mezzanine-level grocery store, 180 units of residential apartments, and over three levels of subterranean parking. The Project is adjacent to Metro bus service (4 and 704 lines) on Santa Monica Blvd.

Metro Comments

Metro Bus Adjacency

1. Service: Metro Bus Lines 4 and 704 operate on Santa Monica Boulevard, adjacent to the proposed Project. Other transit operators may provide service in this area and should be consulted.
2. Final Bus Stop Condition: Any existing Metro bus stops must be maintained as part of the final Project. During construction, stops must be maintained or relocated consistent with the needs of Metro Bus operations. Final design of the bus stop and surrounding sidewalk area must be ADA-compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.
3. Impact Analysis: With an anticipated increase in traffic during and after construction, Metro encourages any impact analysis to include potential effects on the Metro Bus lines. Potential impacts could include construction traffic, operation of and shipment/deliveries to the completed Project, and temporary or permanent bus service rerouting.
4. Driveways: Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.
5. Bus Stop Access & Enhancements: Metro encourages the installation of bus shelters with benches, wayfinding signage, enhanced crosswalks and ramps compliant with the Americans with Disabilities Act (ADA), as well as pedestrian lighting and shade trees in paths of travel to access bus stops and other amenities that improve safety and comfort for transit riders. The City should consider requesting the installation of such amenities as part of the development of the site.
6. Bus Operations Contacts: Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 with any questions and at least 30 days in advance of initiating construction activities. Other municipal buses may also be impacted and should be included in construction outreach efforts.

2

Congestion Management Program

Beyond impacts to Metro facilities and operations, Metro must also notify the Project Sponsor 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).

3

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.

3

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 Eddi Zepeda by phone at 213-418-3484, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza MS 99-22-3
Los Angeles, CA 90012-2952

Sincerely,



Georgia Sheridan, AICP
Senior Manager, Transit Oriented Communities

Attachments and links:

- Adjacent Construction Design Manual
- Adjacent Development Handbook: <https://www.metro.net/projects/devreview/>
- CMP Appendix D: Guidelines for CMP Transportation Impact Analysis

Comment Letter No. A4

Los Angeles County Metropolitan Transportation Authority
Georgia Sheridan, AICP, Senior Manager, Transit Oriented Communities
One Gateway Plaza, MS 99-22-3
Los Angeles, CA 90012-2952

February 1, 2019

Response to Comment No. A4-1

This comment includes a set of general introductory remarks and reiterates the project description. The comment also includes two documents: the Metro Adjacent Development Handbook to guide development along Metro-owned right-of-way, and the Adjacent Construction Manual with technical information. The Project will adhere to these documents as necessary as the project is implemented. The comment presents no environmental issues within the meaning of CEQA and no further response is required.

The comment is acknowledged for the record and will be forwarded to the decision makers for their review and consideration.

Response to Comment No. A4-2

The comment identifies two adjacent bus lines to the Project Site, requires that any existing Metro bus stops be maintained, that impacts to bus routes be considered in the traffic analysis, that driveways be located away from bus stops, the installation of new bus shelters is encouraged, and provides contact information to Metro staff. The following information is provided in response to these comments:

1. Service. The Project area is served by nearby bus lines operated by the Los Angeles County Metropolitan Transportation Authority [Metro] (routes 20/720, 4/704, 734 and 788), Santa Monica Big Blue Bus (routes 1, 2, 3M, 4, 5, 7/R7, 14, 15, R10 and R20), Culver CityBus (routes 6/R6) and the Los Angeles Department of Transportation (LADOT) (Commuter Express route 574). Consultation regarding the Project's potential effects on circulation and transit service with all service providers in the area is on-going.

2. Final Bus Stop Location. There are two bus stops along the perimeter of the Project site (at the southeast corner of Santa Monica Boulevard and Barrington Avenue [the northwest corner of the Project site]), for buses traveling eastbound on Santa Monica Boulevard (Metro bus routes 4/704) and northbound on Barrington Avenue (Santa Monica Big Blue Bus 15). Currently, the Metro bus stop has signage and two bus benches and the Santa Monica Big Blue Bus stop is only improved with signage. These stops will be maintained and upgraded with new bus shelters and seating as part of the Project, and as part of the Traffic Demand Management Mitigation Measure MM- TRAF-5, 1, the Project will improve bus stops at the Santa Monica Boulevard and Barrington Avenue intersection. Any necessary relocations associated with construction of the Project will be done in compliance with Metro requirements and in consultation with Metro.
3. Impact Analysis. The Project's final impacts and construction impacts to traffic circulation are documented in Section IV.I. Transportation/Traffic of the Draft EIR and the Transportation Study for the Project, included as Appendix IV.I-1 of the Draft EIR. All traffic impacts would be mitigated to less than significant levels upon completion of the Project.

Refer to pages IV.I-5 through IV.I-9 of Section IV. I. Transportation/Traffic of the Draft EIR for description of public transportation within the vicinity of the Project Site. The Project is well served by public transit and it is expected that some person trips generated by the Project would utilize public transportation as their primary mode of travel. A discussion of impacts on Transit System Capacity can be found on page IV.I-71 through IV.I-72 of Section IV. I. Transportation/Traffic of the Draft EIR. As stated in the Draft EIR, construction activities are expected to be primarily contained within the Project Site boundaries and would generally not affect the adjacent street access or transit. The adjacent bus stops will likely remain open during construction. In addition, commonly practiced safety procedures for construction will be incorporated as part of a Construction Management Plan coordinated with the City of Los Angeles Department of Transportation as part of Project Design Feature PDF-TRAF-1. The Construction Management Plan will work to maintain pedestrian, transit, and vehicle safety. Construction-related access and transit impacts were therefore determined to be less than significant.

In addition, as stated in the Draft EIR operation of the Project would generate approximately 11 new net transit trips during the weekday morning peak hour and 21 net new transit trips during the weekday afternoon peak hour. The Project location is well served by numerous established transit routes and would not permanently reroute any bus lines. Therefore, it is anticipated that the existing transit service in the Project vicinity would adequately accommodate the Project-generated transit trips, as well as cumulative demand in the region.

As previously discussed, the analysis of potential impacts related to transit in the Draft EIR found that all impacts would be less than significant.

4. **Driveways.** The Project driveways will be located at a new driveway on Idaho Avenue and at existing driveway locations on Barry Avenue, Idaho Avenue, and on Barrington Avenue (approximately 160 feet south of the existing Santa Monica Big Blue Bus stop) and should not interfere with transit operations in any way.
5. **Bus Stop Access & Enhancements.** The Project intends to upgrade pedestrian circulation along all four sides of the project site, as well as provide transit shelters with seating at the bus stops at the southeast corner of Santa Monica Boulevard and Barrington Avenue (the northwest corner of the Project site). The bus shelter installation will be coordinated with the City of Los Angeles, Bureau of Street Services, Coordinated Street Furniture Program and the City's transit shelter provider, OUTFRONT/JC Decaux.
6. **Bus Operations Contacts.** The Project managers will reach out to Metro Bus Operations if necessary to coordinate any construction activities that may impact transit operations.

The comment is acknowledged for the record and will be forwarded to the decision makers for their review and consideration.

Response to Comment No. A4-3

The comment provides detail regarding State requirements for a Transportation Impact Analysis (TIA) under the State of California Congestion Management Program (CMP) and includes the guidelines for TIA as an attachment. Section IV.I. Transportation/Traffic of the Draft EIR and the Transportation Study for the Project,

included as Appendix IV.I-1 of the Draft EIR provided an analysis of all the CMP situations outlined in the comment. Refer to page IV.I-70 of Section IV.I. Transportation/Traffic of the Draft EIR for CMP impact analysis which states that the Project's CMP freeway and arterial intersection impacts are considered to be less than significant. Furthermore, cumulative impacts on public transit are also considered to be less than significant.

The comment is acknowledged for the record and will be forwarded to the decision makers for their review and consideration.

From: [Milena Zasadzien](#)
To: [Lynn Kaufman](#)
Subject: Fwd: Santa Monica —Barrington Mixed-Use Project ENV-2015-2957-EIR
Date: Monday, February 11, 2019 2:55:05 PM

----- Forwarded message -----

From: **Toan Duong** <TDUONG@dpw.lacounty.gov>
Date: Mon, Feb 11, 2019 at 2:31 PM
Subject: Santa Monica —Barrington Mixed-Use Project ENV-2015-2957-EIR
To: Milena.Zasadzien@lacity.org <Milena.Zasadzien@lacity.org>
Cc: Jose Suarez <JSUAREZ@dpw.lacounty.gov>, Long Thang
 <LTHANG@dpw.lacounty.gov>, Kent Tsujii <KTSUJII@dpw.lacounty.gov>

DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)

Thank you for the opportunity to review the DEIR for the proposed project. The Project proposes to construct a new five-story 316,520 square-foot mixed-use development on a 114,563 square-foot vacant site located at 11650 W. Santa Monica Boulevard.

1

The following comments from Los Angeles County Public Works (LACPW) are for your consideration:

1. The intersection of San Vicente/Federal Avenue and Wilshire Boulevard is a shared County of Los Angeles/City of Los Angeles intersection. Please provide and include in the DEIR additional analysis at this intersection utilizing LA County Traffic Impact Analysis Guidelines located at <https://dpw.lacounty.gov/traffic/>. Please contact Mr. Kent Tsuji at (626) 300-4776 or ktsuji@dpw.lacounty.gov for additional information.
2. The DEIR does not specify if new storm drain connections are proposed. The proposed project is adjacent to two Los Angeles County Flood Control District (LACFCD) storm drains, Project No. 3889 Unit 1 – Line C and Project No. 499. Any new connections to the LACFCD storm drains should be identified and will require a Flood Control Permit from LACPW, Land Development Division, Permit Section.
3. Page 1-32: Threshold HYD-5 of the executive summary: This threshold addresses siltation issue but does not address whether there will be additional stormwater flows that can negatively impact nearby LACFCD's storm drains capacities. The EIR should

2

3

address whether the flow rate and volume of stormwater runoff from the project site will be greater than the design capacity of the area's existing drainage system.

4. The project's Initial Study (appendix I-1 NOP and IS of the DEIR) stated the project's approved LID Plan will address the issue of stormwater runoff volume. However, LIDs may only address runoff from a 1-to 2-year rainfall frequency storm and not runoff volumes associated with the 10- to 25-year rainfall frequency storms upon which LACFCD's local storm drain designs are usually based. The EIR should address whether the flow rate and volume of stormwater runoff from the project site will be greater than the design capacity of the area's existing drainage system.

3

If you have any questions regarding comments 2 to 4, please contact Mr. Long Thang at (626) 458-5119 or lthang@dpw.lacounty.gov.

4

We request the opportunity to review the future environmental document when it is available. If you have any question or require additional information, please contact Mr. Jose Suarez of Public Works' Land Development Division at (626) 458-4921 or jsuarez@dpw.lacounty.gov.

Toan Duong

Civil Engineer

Los Angeles County Public Works

Office: (626) 458-4921

Comment Letter No. A5

Los Angeles County Department of Public Works
Toan Duong, Civil Engineer
tduong@dpw.lacounty.gov

February 11, 2019

Response to Comment No. A5-1

This comment includes a set of general introductory remarks and reiterates the project description. It presents no environmental issues within the meaning of CEQA and no specific response is required. However, the comment is acknowledged for the record and will be forwarded to the decision makers for their review and consideration.

Response to Comment No. A5-2

The comment notes that the intersection of San Vicente Boulevard/Federal Avenue and Wilshire Boulevard (Intersection #2) shares jurisdiction with the City of Los Angeles and County of Los Angeles, and analysis should be included utilizing LA County Traffic Impact Analysis Guidelines. In response, a supplemental traffic analysis for the intersection was conducted per the *Draft Traffic Impact Analysis Report Guidelines* (County of Los Angeles Department of Public Works, December, 2013) (County TIA Guidelines). The supplemental traffic analysis is provided as **Appendix B** to this Final EIR. As detailed in **Appendix B**, the Project is not anticipated to result in a significant impact at the intersection of San Vicente Boulevard/Federal Avenue and Wilshire Boulevard under County TIA Guidelines significance threshold.

The comment is acknowledged for the record and will be forwarded to the decision makers for their review and consideration.

Response to Comment No. A5-3

The comment notes that the DEIR does not specify if new storm drain connections are proposed, and whether there will be any new connections to the two adjacent Los Angeles County Flood Control District (LACFCD) storm drains. The comment further states that the EIR should address whether the flow rate and volume of stormwater runoff from the project site will be greater than the design capacity of the area's existing

drainage system, which is designed based on volumes associated with the 10- to 25-year rainfall frequency storms.

There are no plans to connect the proposed project directly to the County storm drain system. Drainage from the project site will continue to drain to the curb/gutter, per the current on-site conditions. The existing condition at the project site is a 100% impervious surface parking lot. The post construction project condition will have reduced runoff compared to the existing condition due to an increase in pervious/landscape area, thus reducing the impact on Los Angeles County Flood Control District's (LACFCD) storm drains.

Regarding stormwater runoff, as previously stated, the post construction condition will reduce runoff as compared to that of the existing condition due to an increase in pervious/landscape area. In addition, adherence to the requirements of the City's Low Impact Development (LID) Stormwater Mitigation Plan will address stormwater runoff from a 1- to 2-year rainfall frequency storm. Further, the LID best management practices (BMPs) will also contribute to a reduction of the runoff volumes associated with a 10- to 25-year rainfall frequency storm. As shown in the table below, the combination of these elements will reduce the runoff volumes of the project compared to the existing condition. The proposed project will not negatively impact the existing LACFCD storm drain system.

Existing and Proposed Peak Runoff Flows

Storm Event	Existing Q_{Total} (cfs)	Proposed Q_{Total} (cfs)	Percent Reduction
5-year	3.6917	3.6044	2.4%
10-year	5.0125	4.9401	1.4%
25-year	6.5631	6.5134	0.8%
50-year	7.4750	7.4397	0.5%
100-year	9.0172	9.0081	0.1%

Notes:

cfs = cubic feet per second

Q = Peak Flow

Source: David Evans and Associates, Inc., April 2019

The comment is acknowledged for the record and will be forwarded to the decision makers for their review and consideration.

Response to Comment No. A5-4

This comment includes contact information for various County staff members. It presents no environmental issues within the meaning of CEQA and no specific response is required. However, the comment is acknowledged for the record and will be forwarded to the decision makers for their review and consideration.



T 510.836.4200
F 510.836.4205

410 12th Street, Suite 250
Oakland, Ca 94607

www.lozeaudrury.com
richard@lozeaudrury.com

Via Email and U.S. Mail

February 1, 2019

Milena Zasadzien, Planner
Department of City Planning
City of Los Angeles
221 N. Figueroa St., Suite 1350
Los Angeles, CA 90012
milena.zasadzien@lacity.org

Lisa Webber, AICP, Deputy Director
Department of City Planning
City of Los Angeles
200 North Spring Street, Room 525
Los Angeles, CA 90012
lisa.webber@lacity.org

Holly L. Wolcott, City Clerk
City Clerk's Office
City of Los Angeles
200 North Spring Street, Room 360
Los Angeles, CA 90012
CityClerk@lacity.org

**Re: Comment on Draft Environmental Impact Report, Santa Monica and
Barrington Mixed-Use Project aka ENV-2015-2957-EIR, SCH
#2016051027**

Dear Ms. Zasadzien, Ms. Webber and Ms. Wolcott:

I am writing on behalf of Supporters Alliance For Environmental Responsibility and its members living in the City of Los Angeles ("SAFER"), regarding the Draft Environmental Impact Report ("DEIR") prepared for the Project known as Santa Monica and Barrington Mixed-Use Project aka ENV-2015-2957-EIR and SCH #2016051027, including all actions related or referring to the proposed construction and operation of a new five-story 316,520 square-foot mixed-use development, comprised of 64,759 square feet of ground-floor and mezzanine-level grocery store and restaurant uses along Santa Monica Boulevard and 180 residential apartments, over three levels of subterranean parking on a 2.6-acre vacant lot located at 11650-11674 W. Santa Monica Boulevard, 1551 S. Barry Avenue, and 1560 S. Barrington Avenue in the City of Los Angeles ("Project").

February 1, 2019

Comment on Draft Environmental Impact Report, Santa Monica and Barrington Mixed-Use Project aka ENV-2015-2957-EIR, SCH #2016051027

Page 2 of 3

After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. SAFER requests that the City of Los Angeles Department of City Planning address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the RDEIR prior to considering approvals for the Project. We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

We hereby request that City of Los Angeles ("City") send by electronic mail, if possible or U.S. Mail to our firm at the address below notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the City and any of its subdivisions, and/or supported, in whole or in part, through contracts, grants, subsidies, loans or other forms of assistance from the City, including, but not limited to the following:

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.
- Any and all notices prepared for the Project pursuant to the California Environmental Quality Act ("CEQA"), including, but not limited to:
 - Notices of any public hearing held pursuant to CEQA.
 - Notices of determination that an Environmental Impact Report ("EIR") is required for the Project, prepared pursuant to Public Resources Code Section 21080.4.
 - Notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.
 - Notices of preparation of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21092.
 - Notices of availability of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations.
 - Notices of approval and/or determination to carry out the Project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
 - Notices of approval or certification of any EIR or negative declaration, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
 - Notices of determination that the Project is exempt from CEQA, prepared pursuant to Public Resources Code section 21152 or any other provision of law.
 - Notice of any Final EIR prepared pursuant to CEQA.

February 1, 2019

Comment on Draft Environmental Impact Report, Santa Monica and Barrington Mixed-Use Project aka ENV-2015-2957-EIR, SCH #2016051027

Page 3 of 3

- Notice of determination, prepared pursuant to Public Resources Code Section 21108 or Section 21152.

Please note that we are requesting notices of CEQA actions and notices of any public hearings to be held under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law. **This request is filed pursuant to Public Resources Code Sections 21092.2 and 21167(f), and Government Code Section 65092,** which requires agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

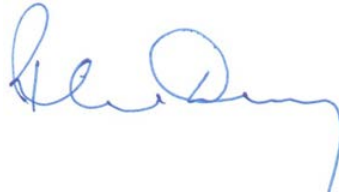
1

Please send notice by electronic mail, if possible or U.S. Mail to:

Richard Drury
Komalpreet Toor
Hannah Hughes
Lozeau Drury LLP
410 12th Street, Suite 250
Oakland, CA 94607
510 836-4200
richard@lozeaudrury.com
komal@lozeaudrury.com
hannah@lozeaudrury.com

Please call if you have any questions. Thank you for your attention to this matter.

Sincerely,



Richard Drury
Lozeau Drury LLP

Comment Letter No. O1**Lozeau Drury LLP**

Richard Drury
410 12th Street, Suite 250
Oakland, CA 94607

February 1, 2019

Response to Comment O 1-1

The comment states the letter is written on behalf of the Supporters Alliance For Environmental Responsibility (“SAFER”) and its members living in the City of Los Angeles. The comment claims that the Draft EIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project’s impact, but provides no specifics. The comment suggests that the City should address the shortcomings in a revised Draft EIR and recirculate the revised Draft EIR prior to approval. The comment states it reserves the right to supplement the comments during the review of the Final EIR for the Project and at the public hearings.

The comment does not identify any specific shortcomings of the Draft EIR analysis or mitigation measures, and no specific response is therefore possible or required. Furthermore, and contrary to the allegation in this comment, the Draft EIR complied fully with all of CEQA’s requirements. The comment presents no substantial evidence to the contrary about any specific impact area. As provided in Section 15064(f)(5), unsubstantiated opinion or narrative does not constitute substantial evidence. Since the commenter provides no substantial evidence regarding the alleged inadequacy of the Draft EIR, the claims contained in the comment letter would provide no basis for changes to the Draft EIR.

The comment is acknowledged for the record and will be forwarded to the decision makers for their review and consideration.

South Brentwood Residents Association

149 South Barrington Ave. #194

Los Angeles, California 90049

www.southbrentwood.org

January 21, 2019

Milena Zasadzien and
Jason McCrea, City Planner
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

By email to Milena.Zasadzien@lacity.org and Jason.mccrea@lacity.org

Re: Santa Monica and Barrington Mixed Use Project, 11650-11674 W. Santa Monica Boulevard, 1551 S. Barry Avenue, and 1560 S. Barrington Avenue, Los Angeles, California, 90025

Case No.: ENV-2015-2957-EIR

I am writing on behalf of the board and members of the South Brentwood Residents Association (SBRA). SBRA represents approximately 18,000 home-owners and renters who reside in the area south of San Vicente Blvd., north of Wilshire Blvd., east of Centinela and west of Federal. Additionally, SBRA represents the interests of those in multi-family dwellings throughout the entire Brentwood community.

South Brentwood is approximately ½ mile north of the project. Barrington Avenue is one of our two main north-south thoroughfares. Traffic throughout our area is gridlocked during peak hours.

We strongly support all of the mitigation measured that are proposed for this project as TRA-2, in particular the left turn phasing improvements at Barrington Avenue/Wilshire Blvd. and Ohio Avenue/Sepulveda Boulevard. We currently have left turn phasing at Bundy Drive/Wilshire Blvd. and our observation is that this helps to keeps traffic moving on Bundy Drive relative to the current situation on Barrington Avenue.

We request that these mitigations be implemented as soon as the project is approved and that they don't have to wait until the project is completed.

In addition, we strongly oppose Alternative 5: All Commercial/Retail Alternative. A major reason for the horrendous peak hour traffic in our area is the lack of residential housing relative to the amount of commercial office space. This lack of housing means that large numbers of commuters must drive westbound to the west of the I-405 during AM peak and eastbound in PM peak, creating daily gridlock throughout Brentwood and West Los Angeles. Alternative 5 only makes the gridlock worse and does nothing to add much-needed residential housing to the area.

Thank you for your consideration of those comments.

Sincerely,



Elyse Arbour
President
South Brentwood Residents Association

cc:
Councilmember Mike Bonin- Council District 11
Krista Klein – Council District 11
Len Nguyen – Council District 11
Michelle Bisnoff – Brentwood Community Council
Lauren Cole- South Brentwood Residents Association

Comment Letter No. O2**South Brentwood Residents Association**

Elyse Arbour, President

149 South Barrington Avenue, # 194

Los Angeles, CA 90049

January 21, 2019

Response to Comment No. O 2-1

This comment includes a set of general introductory remarks and supports the implementation of Mitigation Measure TRA-2, and requests that the mitigation measure be implemented at project approval, rather than after construction of the project.

Implementation of Mitigation Measure TRA-2 for the funding and implementation of several signal and traffic camera improvements within the vicinity is under the jurisdiction of the Los Angeles Department of Transportation (LADOT). Review and approval of the plans for the improvements would occur concurrent with the review of the building plans. Pending approval by LADOT, it is anticipated that construction of the improvements would occur concurrent with streetscape improvements at the project site, which would also require the approval of LADOT. Consistent with LADOT practice, improvements would be required to be paid for and guaranteed prior to the issuance of the building permit.

The comment is acknowledged for the record and will be forwarded to the decision-makers for their review and consideration.

Response to Comment No. O 2-2

The comment states opposition to Alternative 5: All Commercial/Retail Alternative and supports housing on the site as a way to relieve traffic congestion. It presents no environmental issues within the meaning of CEQA and no specific response is required. However, the comment is acknowledged for the record and will be forwarded to the decision makers for their review and consideration.

From: [Milena Zasadzien](#)
To: [Lynn Kaufman](#); [Kimberly Rible](#)
Subject: Fwd: Whole Foods / Santa Monica-Barrington mixed-use project (11650 Santa Monica Blvd., West LA). ENV-2015-2957-EIR
Date: Wednesday, January 02, 2019 12:36:21 PM

Hi Lynn,
Please see attached comment letter.

Milena Zasadzien

LOS ANGELES DEPARTMENT OF CITY PLANNING
MAJOR PROJECTS / ENVIRONMENTAL ANALYSIS
221 N. Figueroa St. Suite 1350, Los Angeles 90012
e: milena.zasadzien@lacity.org p: 213.847.3636

----- Forwarded message -----

From: **Jian K** <jiank26@yahoo.com>
Date: Tue, Jan 1, 2019 at 11:24 AM
Subject: Re: Whole Foods / Santa Monica-Barrington mixed-use project (11650 Santa Monica Blvd., West LA). ENV-2015-2957-EIR
To: Milena.Zasadzien@LACity.org <Milena.Zasadzien@lacity.org>
Cc: ross_jay@hotmail.com <ross_jay@hotmail.com>

Hello Milena

I am a residence at 1756 Barry Ave 90025 for at less past 30 years and previous WLANC and PLUM committee, I have seen this neighborhood changed and grown for worse since I have moved here, unfortunately none of you would take the time to make some thing better, the planners seats for a long time on the case and many times a file will shoots from one planner to other and the neighbors will get busy and a project after a project will get lost in transaction and eventually approved without neighbors wanting the project and they have to deal with more congestion area and traffic.

Unfortunately Barry Ave become a secondary route of Barrington Ave, so if you drive any time between 4:00 to 6:00 pm it became worse then Santa Monica Blvd, you will see bumper to bumper car, load horns because one car crosses the slower one and there is no way for the residence to get to the street that they live at or even some times to get out of their own driveway.

As a person who practice architecture for past 30 years and a license contractor as well as real estate broker and previous WLANC and PLUM committee member, I **object** the design that this developer has presented.

Please kindly send them back for reduction of the residence and the commercial portion of it at less by 50%, this project is in Q condition and they have no rights to what they have presented, I know that LA city is all about money and creation of revenue and property tax collection but there is no need for many residence and commercial building which LA city approved since

2012 to now.

Thank you for not being like your other colleagues.

Jian Kerendian

On Saturday, December 29, 2018, 8:43:43 AM PST, Jay Ross <ross_jay@hotmail.com> wrote:

To my neighbors,
If you wish to submit public comments for the EIR, you may forward mine or write your own.

Zuriel Espinosa-Salas, Planning Dept.

Milena.Zasadzien@LACity.org

CD11:

Len.Nguyen@LACity.org, Krista.Kline@LACity.org, Hannah.Levien@LACity.org

To: Milena Zasadzien, Planning Dept.

Re: Santa Monica-Barrington mixed-use project (11650 Santa Monica Blvd., West LA) (Whole Foods project, old Vons site).

ENV-2015-2957-EIR

I recommend these design revisions to make the project blend with the neighborhood. As designed, it is a big cube with no articulation dropped into the middle of a smaller neighborhood with some flowing architecture added to the façade. There is no articulation or variation:

1. An increase to 15% of the total unit count shall be restricted to very low-income households, per HCID / HUD regulations (income limits, rent limits).
 1. Housing affordability and homelessness are worsening and at or near “crisis” stage, which justifies a higher affordability component.
 2. An off-menu incentive for increased height of 2 levels is requested, instead of the available on-menu incentive of increased height of 1 level, which justifies a higher affordability component.
2. The front (north) half shall be remain as designed at 5 stories, which includes 55,000 sf grocery with units, a 6,500 sf semi-public plaza that is flush with the sidewalk and has no barriers to entrance, and a podium “sky deck” as private amenities.
3. The Santa Monica Blvd. sidewalk should be 15 ft. wide with street trees every 30 ft.

4. The sidewalks on the other 3 sides (Barry, Barrington and Idaho) should be 12 ft. wide.
5. The rear (south) half of the building shall be revised:
 1. Setbacks shall be similar to R4 zoning (which is the design of this section of the project) -- 10 ft. on Idaho Ave., and 8 ft. on Barry Ave. and Barrington Ave.
 2. Steppbacks of 50 ft. for the 4th and 5th levels facing Idaho Ave.
 1. Shorter apartments are located along Idaho Ave. (primarily 2-story buildings) and the south half of Barrington Ave. (2- and 4-story buildings) and Barry Ave. (primarily 2-story buildings).
 2. 4 story buildings are actually in the minority in the area. Most are older 2-story apartments.
6. Truck loading shall be from Barrington Ave., instead of the quieter residential street of Barry Ave.
7. A podium cap shall extend over the rear vehicle entrance (flush with the floor of the 2nd level) to provide more open space amenities for residents of the south half of the project (~100 units).
 1. The roof likely will be filled with solar panels, and the recreation area/ roof deck may not fit. That location on the roof is inconvenient and difficult to access for disabled persons, frail elderly persons, and very young children.
 2. Recreation space should be as low as possible, preferably on the 1st floor podium.
8. A Transportation Demand Program shall be developed, which should include a free 1-year MTA transit pass to every new employee and every new resident in perpetuity.
9. Landscaping shall screen the trash and transformers.
10. Owner shall fund parking permits for the adjacent 6 blocks/quadrants. Residents of this project shall be prohibited from receiving street parking permits for that district, so they don't park on the street and the project remains truly "transit oriented" (which is how the density bonuses are justified).

Comment Letter No. I 1

Jian Kerendian

Jiank26@yahoo.com

January 1, 2019

Response to Comment No. I 1-1

This comment includes a set of general introductory remarks and opposition to the proposed project as currently designed and recommends that the project be reduced by half. The comment also states that Barry Avenue is gridlocked in traffic during the afternoon peak hours. The commenter also included a copy of Comment Letter I 2 in it's entirety, which is included and responded to below.

Regarding the comment recommended a reduced project, the Draft EIR analyzed a Reduced Project Alternative (refer to Section IV., Alternative in the Draft EIR), with a reduced total floor area of 176,301 square feet, a 56.7 percent reduction from the proposed Project. The Reduced Project Alternative would include 64,759 square feet of commercial (grocery store and restaurant) uses, 59 residential units, recreation/open space areas, and a two-level subterranean parking garage. All of the new housing units under this Alternative would be offered at market rate.

The analysis found that while the Reduced Project Alternative would be environmentally superior to the Proposed Project, as it would further reduce the significant, but mitigatable impacts of the Proposed Project regarding traffic/transportation (impacting one street segment), as well as further reduce less than significant impacts in terms of operational air quality, greenhouse gas emissions, and operational noise; and would meet most of the objectives of the Proposed Project. However, as the Alternative would not include any affordable units, it would not contribute to increasing the City's housing stock consistent with the Mayor's Executive Directive No. 13 and the 2014-2021 Regional Housing Needs Assessment (RHNA).

Refer also to information provided for the record in Response to Comment I 2.

Regarding traffic along Barry Avenue, the Draft EIR provided an analysis of the Project's potential residential street segment impacts in the vicinity of the Project,

including Barry Avenue between Santa Monica Boulevard and Idaho Avenue. The analysis concluded that due to the potential impacts of Project traffic on the residential streets of Barry Avenue and Idaho Avenue (as identified in Table IV.I-13 and Table IV.I-14 on page IV.I-68 of the Draft EIR), the Project would be required to prepare a Neighborhood Traffic Management Plan (NTMP) in collaboration with LADOT that would cover Barry Avenue and Idaho Avenue along the Project's frontage. The Draft EIR concluded that impacts to Barry Avenue and other residential street segments would be less than significant with mitigation. Below is the mitigation measure included in the Draft EIR as Mitigation Measure TRA-4.

MM-TRA-4: The NTMP shall be prepared in conformance with the guidelines established by LADOT and would contain, at a minimum, a description of existing facilities and neighborhood traffic conditions and a description of the proposed neighborhood traffic controls, including sketches of specific street modifications. These proposed neighborhood traffic controls would be approved by the LADOT Western District Senior Traffic Engineer as well as the Los Angeles Police and Fire Departments. Once approved, the improvements would be submitted to the neighbors for a vote.

If the recommended NTMP received a majority approval by the affected neighbors, the improvements would be implemented on a temporary basis (e.g., six-month trial) and follow-up studies would be conducted to document any change in the future traffic patterns as a result of implementation of the plan.

After the temporary trial period, the neighbors would get a chance to vote on whether or not to make the neighborhood improvements permanent or to remove them. Again, a majority vote of the affected neighbors would be required to install the devices.

Once the second vote of the neighbors took place and the devices were removed or made permanent, the developer's NTMP responsibility would be satisfied. Following implementation of Mitigation Measure TRA-4 impacts related to neighborhood intrusion would be considered less than significant.

The comment otherwise presents no environmental issues within the meaning of CEQA and no specific response is required. However, the comment is acknowledged for the record and will be forwarded to the decision-makers for their review and consideration.

To: Milena Zasadzien, Planning Dept.

Fr: Jay Ross, West L.A. resident

Re: Santa Monica-Barrington mixed-use project (11650 Santa Monica Blvd., West LA).

ENV-2015-2957-EIR

I recommend these design revisions to make the project blend with the neighborhood. As designed, it is a big cube with no articulation dropped into the middle of a smaller neighborhood with some flowing architecture added to the façade. There is no articulation or variation:

1. An increase to 15% of the total unit count shall be restricted to very low-income households, per HCID / HUD regulations (income limits, rent limits).
 - a. Housing affordability and homelessness are worsening and at or near “crisis” stage, which justifies a higher affordability component.
 - b. An off-menu incentive for increased height of 2 levels is requested, instead of the available on-menu incentive of increased height of 1 level, which justifies a higher affordability component.
2. The front (north) half shall be remain as designed at 5 stories, which includes 55,000 sf grocery with units, a 6,500 sf semi-public plaza that is flush with the sidewalk and has no barriers to entrance, and a podium “sky deck” as private amenities.
3. The Santa Monica Blvd. sidewalk should be 15 ft. wide with street trees every 30 ft.
4. The sidewalks on the other 3 sides (Barry, Barrington and Idaho) should be 12 ft. wide.
5. The rear (south) half of the building shall be revised:
 - a. Setbacks shall be similar to R4 zoning (which is the design of this section of the project) -- 10 ft. on Idaho Ave., and 8 ft. on Barry Ave. and Barrington Ave.
 - b. Stepbacks of 50 ft. for the 4th and 5th levels facing Idaho Ave.
 - i. Shorter apartments are located along Idaho Ave. (primarily 2-story buildings) and the south half of Barrington Ave. (2- and 4-story buildings) and Barry Ave. (primarily 2-story buildings).
 - ii. 4 story buildings are actually in the minority in the area. Most are older 2-story apartments.
6. Truck loading shall be from Barrington Ave., instead of the quieter residential street of Barry Ave.
7. A podium cap shall extend over the rear vehicle entrance (flush with the floor of the 2nd level) to provide more open space amenities for residents of the south half of the project (~100 units).

- a. The roof likely will be filled with solar panels, and the recreation area/ roof deck may not fit. That location on the roof is inconvenient and difficult to access for disabled persons, frail elderly persons, and very young children.
 - b. Recreation space should be as low as possible, preferably on the 1st floor podium.
8. A Transportation Demand Program shall be developed, which should include a free 1-year MTA transit pass to every new employee and every new resident in perpetuity.
9. Landscaping shall screen the trash and transformers.
10. Owner shall fund parking permits for the adjacent 6 blocks/quadrants. Residents of this project shall be prohibited from receiving street parking permits for that district, so they don't park on the street and the project remains truly "transit oriented" (which is how the density bonuses are justified).

Comment Letter No. I 2

Jay Ross

ross_jay@hotmail.com

December 29, 2018

Response to Comment No. I 2-1

This comment includes a set of general introductory remarks, opposition to the proposed project as currently designed, including recommendations to: increase the percentage of affordable housing included in the project to 15 percent of the total unit count, certain sidewalk width standards, a stepped-back building design along Idaho Avenue, relocating truck loading to Barrington Avenue, changes to the open space amenities, require that the proposed Transportation Demand Program include free MTA transit passes for employees and residents, as well as require the Project to provide funding for parking permits for the adjacent six blocks/quadrants.

The affordability and design-related issues, including parking considerations, will be addressed and considered when the City considers the entitlement requests, and are not CEQA issues. Otherwise, in reference to CEQA, analyses of Aesthetics and Parking were exempt per SB743 (refer to Initial Study, Section IV. Environmental Impact Analysis, page IV-1). Impacts to Land Use Planning were found to be a less than significant (refer to Section IV.D, Land Use Planning in the Draft EIR). Operational impacts of traffic or truck loading on the local Barry Avenue residential street segment were found to be less than significant (refer to Section IV.I, Transportation in the Draft EIR). In addition, a Traffic Demand Management mitigation measure will be implemented as part of the Project, which requires access pass and transit pass reductions for residents and supermarket employees, as well as other measures for the reduction of vehicle trips by users of the site:

MM-TRA-5 The applicant shall provide a Transportation Demand Management (TDM) Plan including a variety of measures to reduce single occupant vehicle trips by increasing walking, bicycling, carpool, and transit trips. A detailed description of the plan shall be submitted to LADOT for review and approval prior to the issuance of any certificate of occupancy. The TDM

plan should include, but is not limited to, the following strategies (to the extent applicable):

1. Improve bus stops at the Santa Monica Boulevard and Barrington Avenue intersection.
2. Provide an on-site TDM manager to assist in matching rideshare partners, determining transit routes, and promoting TDM program.
3. Provide access pass and transit pass reductions for residents and supermarket employees.
4. Provide visible on-site kiosk(s) with options for ridesharing, bus routes, and bike routes, located in a prominent area readily visible to residents and supermarket employees.
5. Provide bicycle spaces to encourage cycling as an alternative to single occupant vehicles.
6. Participate in a bicycle sharing service.

The comment otherwise presents no environmental issues within the meaning of CEQA and no specific response is required. However, the comment is acknowledged for the record and will be forwarded to the decision makers for their review and consideration.

From: [Milena Zasadzien](#)
To: [Lynn Kaufman](#)
Subject: Fwd: Support for 11650-11674 W. Santa Monica Blvd, case ENV-2015-2957-EIR
Date: Tuesday, February 19, 2019 11:42:24 AM

Milena Zasadzien

LOS ANGELES DEPARTMENT OF CITY PLANNING
 MAJOR PROJECTS / ENVIRONMENTAL ANALYSIS
 221 N. Figueroa St. Suite 1350, Los Angeles 90012
 e: milena.zasadzien@lacity.org p: 213.847.3636

----- Forwarded message -----

From: Alex Chen <aznyellojersey@everyactioncustom.com>
Date: Tue, Jan 15, 2019 at 10:46 AM
Subject: Support for 11650-11674 W. Santa Monica Blvd, case ENV-2015-2957-EIR
To: <milena.zasadzien@lacity.org>

Dear City Planner Milena Zasadzien,

I am writing to comment on the Draft EIR for the proposed 180-unit mixed-use development, including 20 dedicated Very Low Income units and 64,759 square feet of grocery store and restaurant uses along Santa Monica Boulevard, at 11650-11674 W. Santa Monica Blvd, 1551 S. Barry Ave, and 1560 S. Barrington Ave, case ENV-2015-2957-EIR. I urge the city to approve the Draft and Final EIR for the project under the California Environmental Quality Act (CEQA), as proposed, with no alternatives.

This project is in a great location for housing. It is across the street from frequent Big Blue Bus service to UCLA, Brentwood, Santa Monica and Venice (Routes 1 & 4 on Santa Monica Blvd and Route 15 on Barrington Ave) as well as frequent Metro bus service to downtown LA (Route 704 on Santa Monica Blvd). It provides good transit access to employment in downtown LA and Santa Monica, and is just over a mile from a Metro Blue Line station (Bundy Drive & Exposition Boulevard). In addition, many desirable neighborhood amenities such as restaurants and retail are in easy walking and bicycling distance, and the project includes 239 bicycle spaces.

The Sierra Club California has recently issued a report calling for stronger support for infill development, higher housing densities, and social justice to help reduce pollution and preserve the natural environment. https://www.sierraclub.org/sites/www.sierraclub.org/files/sce/sierra-club-california/PDFs/SCC_Housing_Policy_Report.pdf

Regarding environmental impact, the project has the following benefits:

Aesthetics: the project will create a new, well-designed, modern 5-story mixed-use development, and replace a surface parking lot. Therefore the project will have a positive impact on aesthetics.

Air quality: with regard to criteria 1 through 3, the project will enable more people to live in a walkable, mixed-use area, which will have a positive impact on air quality. CEQA air quality analysis has historically assumed that if a project is not built, the people who would have lived

in it simply vanish. It is long since time to recognize that the more likely case is that development is displaced further out, to places like Santa Clarita and the Antelope Valley. It is better for regional air quality for development to take place in west Los Angeles than in Newhall Ranch.

Greenhouse gas emissions: similar to air quality impacts, it is likely this project will have a positive impact on GHG emissions, by allowing more people to live in places where they can drive less, instead of in auto-dependent development in the Inland Empire. It also enables more people to live in a state with progressive climate policies, as opposed to moving to fast-growing states with regressive climate policies.

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Sincerely,
Alex Chen
Los Angeles, CA 90012
aznyellojersey@gmail.com

Comment Letter No. I 3 through I 50

January 14-18, 2019

48 individuals submitted an identical form letter in support of the Project via the 'EveryAction Advocacy' on-line utility. Each individual is listed in the **Table II-1, Matrix of Comments Received in Response to the Draft EIR**, above.

Response to Comment No. I 3-1

The comment letter includes a set of general introductory remarks and support of the proposed project; including a discussion of the benefits of infill and transit-oriented development and the positive effect this type of development can have on aesthetics and long-term impacts to air quality and greenhouse emissions. The letter presents no environmental issues within the meaning of CEQA and no specific response is required. However, the comment letters are acknowledged for the record and will be forwarded to the decision makers for their review and consideration.