

SECTION 3.0 RESPONSES TO WRITTEN COMMENTS

The Draft EIR for the Aviation Station Project was circulated on January 11, 2011 for a formal 45-day public comment period ending on February 24, 2011. During and after the close of the public review period on February 24, 2011, the County of Los Angeles Department of Regional Planning received a total of fourteen comment letters on the Draft EIR.

The County of Los Angeles Regional Planning Commission (RPC) held a public hearing on the Draft EIR on February 16, 2011. Public comments were received at the RPC hearing. Refer to Section 4.0 of this Final EIR for the responses to oral comments received at the RPC hearing.

The County's Responses to Written Comments are provided below. Each comment letter is identified by the abbreviation of the agency/organization name, or by the last name of the individual commenter, as noted in parentheses next to the list of written commenters below, and each comment in each letter is individually numbered beginning with "1". For example, the comment letter from the California Department of Transportation is identified as letter "CA DOT" and the individual comments in this letter are identified as CA DOT-1, CA DOT-2, etc. Responses to these written comments are identified using the same convention; hence, the response to the first comment of this letter is identified as "Response CA DOT-1". The Responses to Written Comments presented herein are organized as follows:

- 1) Comment letter (with comment numbers identified in the margins of letters), followed by
- 2) Written responses.

The following agencies/organizations/persons provided written comments on the Draft EIR to the County of Los Angeles Department of Regional Planning:

State Agencies

Department of Transportation, Division of Aeronautics, February 16, 2011 (CA DOT)
Governor's Office of Planning and Research, February 25, 2011 (OPR)

Regional Agencies

Metropolitan Transportation Authority, February 10, 2011 (Metro-1)
Metropolitan Transportation Authority, February 24, 2011 (Metro-2)
South Coast Air Quality Management District, February 24, 2011 (SCAQMD)
Wiseburn School District, February 24, 2011 (WSD)

Local Agencies

Sheriff's Department, February 17, 2011 (LASD)
City of El Segundo, Planning and Building Safety Department, February 24, 2011 (El Segundo)
City of Hawthorne, Department of Public Works, March 3, 2011 (Hawthorne)
City of Los Angeles, Department of Transportation, March 9, 2011 (LADOT)

Interested Groups/Individuals

Del Aire Neighborhood Association, February 7, 2011 (DANA)

Cox, Castle & Nicholson, LLP, February 10, 2011 (CCN)

Cindy Parsons, Hawthorne, CA, February 24, 2011 (Parsons)

Northrop Grumman Corporation, February 28, 2011 (Northrop)

DEPARTMENT OF TRANSPORTATION

DIVISION OF AERONAUTICS – M.S.#40

1120 N STREET

P. O. BOX 942874

SACRAMENTO, CA 94274-0001

PHONE (916) 654-4959

FAX (916) 653-9531

TTY 711



*Flex your power!
Be energy efficient!*

February 16, 2011

Ms. Christina Tran
Los Angeles County
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

FEB 22 2011

Dear Ms. Tran:

Re: Los Angeles County’s Draft Environmental Impact Report (DEIR) for the Aviation Station Project; SCH# 2009051097

CA DOT

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to the California Environmental Quality Act (CEQA). The Division has technical expertise in the areas of airport operations safety, noise, and airport land use compatibility. We are a funding agency for airport projects and we have permit authority for public-use and special-use airports and heliports. The following comments are offered for your consideration.

As outlined in the DEIR, the Aviation Station Project proposes to develop a total of 390 residential units and 29,500 square feet of commercial in a mixed-use development. Lot 1 would include 278 residential units and 8,000 square feet of commercial and leasing office space, and Lot 2 would include 112 residential units and 21,500 square feet of commercial. The residential units within Lot 1 are proposed to be developed as for-sale condominium units and townhouses, and the residential units within Lot 2 as rental apartments.

The project site is located approximately 1,000 feet southeast of the Los Angeles International Airport (LAX) and 3,000 feet from the approach end to Runway 25L. Pursuant to the Airport Noise Standards (California Code of Regulations, Title 21, Chapter 6, Section 5000 et seq.), the County of Los Angeles declared LAX to have a “noise problem”. The regulations require a noise problem airport to reduce the size of its “noise impact area” (NIA), which is the area within the airport’s 65 decibel (dB) Community Noise Equivalent Level (CNEL) contour that is composed of incompatible land uses.

The new residential units in this project that are within LAX’s 65 dB CNEL aircraft noise contour will increase the NIA unless appropriate mitigation measures are applied to them. On page 3.4-23 the DEIR correctly accommodates the “high rise apartment” and “condominium” residential units by assuring their interior noise level is 45 dB CNEL, or less, and that they have an air circulation or air conditioning system.



Ms. Christina Tran
February 16, 2011
Page 2

The 20 new two-story townhouses within Lot 1 do not appear to meet the description of “high rise apartment” or “condominium” pursuant to Section 5014(a)(3) of the Noise Standards. Therefore, unless an appropriate mitigation as described in Section 5014(a) of the Noise Standards is applied to each new townhouse, such as an avigation easement for aircraft noise, these units will increase the size of LAX's noise impact area.



These comments reflect the areas of concern to the Division with respect to airport-related noise, safety, and regional land use planning issues.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please call me at (916) 654-6223, or by email at philip_crimmins@dot.ca.gov.

Sincerely,

PHILIP CRIMMINS
Aviation Environmental Specialist

c: State Clearinghouse, Los Angeles County ALUC, Los Angeles World Airports

**Written Responses to:
State of California Department of Transportation, Division of Aeronautics (CA DOT)**

Response CA DOT-1

This comment describes the focus of CA DOT's review of the Draft EIR under CEQA, summarizes the proposed Project, and describes the relevant State and County regulations related to airport noise and LAX. This comment does not raise 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. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Response CA DOT-2

The comment states, "The new residential units in this project that are within LAX's 65 dB CNEL aircraft noise contour will increase the NIA (noise impact area) unless appropriate mitigation measures are applied to them." The County agrees with the commenter's acknowledgement that the analysis for the residential apartment and condominium units within the four towers (Buildings 1A, 2A, 1B, and 2B) are appropriately analyzed and mitigated to reduce impacts associated with their partial location within the 65 CNEL. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Response CA DOT-3

The comment states that mitigation measures prescribed by the California Airport Noise Standards required for new residential units within the LAX 65 dB CNEL aircraft noise contour have not been applied to the proposed 20 two-story townhouses. The proposed townhouses would be located adjacent to the north side of West 117th Street and adjacent to the west side of Judah Avenue, as depicted on the fold-out Vesting Tentative Tract Map and Site Plan included within the Draft EIR, and labeled on Exhibit 2-11, Street Level Conceptual Landscape Plan. The locations for the proposed townhomes are not within LAX's 65 dB CNEL aircraft noise contour, which crosses through the Project site, as shown on Exhibit 3.4-5 of the Draft EIR, which is the latest available noise contour map from LAX. It is noted that regardless of location relative to the LAX 65 dB CNEL aircraft noise contour, all residential units, including the townhomes, would be designed and constructed to ensure that interior noise levels will not exceed 45 dBA CNEL, as described in mitigation measure (MM) 3.4-7 and consistent with State noise standards.

The LAX 65 dB CNEL aircraft noise contour generally bisects the Project site from west to east and does not include a large portion of the four towers (Buildings 1A, 2A, 1B, and 2B), nor any of the townhomes, which are located along the eastern and southern outside perimeters of the four towers. Therefore, the Sections of the California Airport Noise Standards that apply to new residential units within a 65 dB CNEL aircraft noise contour do not apply to the proposed townhouses and the Project will not increase the NIA. However, in order to clarify that only a portion of the Project site is located within the current boundary of the LAX 65 dB CNEL aircraft noise contour, the wording of MM 3.4-8 regarding notification the of prospective purchasers of residential properties on the Project site has been revised, as set forth in Section 2.0, Errata.

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JERRY BROWN
GOVERNOR

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



February 25, 2011

FEB 28 2011

Christina Tran
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Subject: Aviation Station Project (TR070853 / RCUPT200900024 / RZCT200900002 /
RENV200900027)
SCH#: 2009051097

Dear Christina Tran:

SCH

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 24, 2011, 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

**Document Details Report
State Clearinghouse Data Base**

SCH# 2009051097
Project Title Aviation Station Project (TR070853 / RCUPT200900024 / RZCT200900002 / RENV200900027)
Lead Agency Los Angeles County

Type EIR Draft EIR

Description The Project proposes to develop 278 residential units and 8,000 sq ft of commercial/retail and leasing office space within Lot 1, and 112 residential units and 21,500 sq ft of commercial within lot 2. The residential units within Lot 1 are proposed to be developed as for-sale condominium units and townhouses, and the residential units within Lot 2 as rental apartments. Approximately 6.1 acres of off-site property owned by Caltrans located immediately to the north of the Project site is proposed to be improved as a part of the Project. The "Caltrans Off-site Project Area" includes the relocated 1.85-acre Metro bus terminal, the reconfiguration of the 3.65-acre Caltrans Park and Ride Lot, and reconfiguration of 0.6-acre of parking for the Caltrans Maintenance Facilities.

Lead Agency Contact

Name Christina Tran
Agency Los Angeles County Department of Regional Planning
Phone (213) 974-6461 **Fax**
email
Address 320 West Temple Street
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of
Region
Lat / Long 33° 55' 44" N / 118° 22' 40" W
Cross Streets Aviation Blvd. & West 116th Street
Parcel No. 4140-002-001
Township **Range** **Section** **Base**

Proximity to:

Highways Imperial Hwy, I-105
Airports LAX World Airport
Railways BNSF
Waterways
Schools Anza Elem & Lennox Preschool
Land Use Commercial and residential uses / R-1, C-1, and PF / Low Density Residential and Public Facility

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Drainage/Absorption; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Caltrans, Division of Aeronautics; Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Department of Parks and Recreation; Department of Water Resources; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, District 7; Department of Housing and Community Development; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Date Received 01/11/2011 **Start of Review** 01/11/2011 **End of Review** 02/24/2011

DEPARTMENT OF TRANSPORTATION

DIVISION OF AERONAUTICS - M.S.#40

1120 N STREET

P. O. BOX 942874

SACRAMENTO, CA 94274-0001

PHONE (916) 654-4959

FAX (916) 653-9531

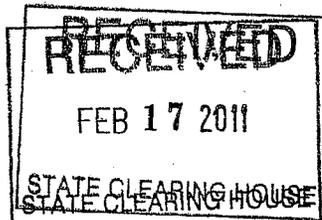
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*Flex your power!
Be energy efficient!*

February 16, 2011

Ms. Christina Tran
Los Angeles County
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012



Clear
2/24/11
P

Dear Ms. Tran:

Re: Los Angeles County's Draft Environmental Impact Report (DEIR) for the Aviation Station Project; SCH# 2009051097

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to the California Environmental Quality Act (CEQA). The Division has technical expertise in the areas of airport operations safety, noise, and airport land use compatibility. We are a funding agency for airport projects and we have permit authority for public-use and special-use airports and heliports. The following comments are offered for your consideration.

As outlined in the DEIR, the Aviation Station Project proposes to develop a total of 390 residential units and 29,500 square feet of commercial in a mixed-use development. Lot 1 would include 278 residential units and 8,000 square feet of commercial and leasing office space, and Lot 2 would include 112 residential units and 21,500 square feet of commercial. The residential units within Lot 1 are proposed to be developed as for-sale condominium units and townhouses, and the residential units within Lot 2 as rental apartments.

The project site is located approximately 1,000 feet southeast of the Los Angeles International Airport (LAX) and 3,000 feet from the approach end to Runway 25L. Pursuant to the Airport Noise Standards (California Code of Regulations, Title 21, Chapter 6, Section 5000 et seq.), the County of Los Angeles declared LAX to have a "noise problem". The regulations require a noise problem airport to reduce the size of its "noise impact area" (NIA), which is the area within the airport's 65 decibel (dB) Community Noise Equivalent Level (CNEL) contour that is composed of incompatible land uses.

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Ms. Christina Tran

February 16, 2011

Page 2

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These comments reflect the areas of concern to the Division with respect to airport-related noise, safety, and regional land use planning issues.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please call me at (916) 654-6223, or by email at philip_crimmins@dot.ca.gov.

Sincerely,

Original Signed by

PHILIP CRIMMINS
Aviation Environmental Specialist

c: State Clearinghouse, Los Angeles County ALUC, Los Angeles World Airports

**Written Responses to:
Governor's Office of Planning and Research (OPR)**

Response OPR-1

This comment states that the Office of Planning and Research (OPR) State Clearinghouse has submitted the Aviation Station Project Draft EIR to selected state agencies for review, and acknowledges that the Draft EIR has complied with the State Clearinghouse review requirements for draft environmental documents pursuant to CEQA. No response is required. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Response OPR-2

The OPR comment letter attachments are comprised of the State Clearinghouse Data Base Document Details Report and a Project comment letter received from the State of California Department of Transportation (Division of Aeronautics) dated February 16, 2011. The California Department of Transportation comment letter on the Draft EIR is responded to fully in Responses CA DOT-1 through CA DOT-3 in Section 3.0 of this Final EIR.

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Metro

February 10, 2011

Mr. Richard Bruckner
Department of Regional Planning
County of Los Angeles
320 West Temple Street, 13th Floor
Los Angeles, California 90012

Re: Project No. TR070853-(2)

Dear Mr. Bruckner,

METRO-1

The Los Angeles County Metropolitan Transportation Authority (“LACMTA”) joins Kroeze Family LLC and Kroeze Inc. in an application for environmental review of the above-referenced proposal for mixed-use transit-oriented development (the “Project”).

Transit-oriented development (“TOD”) is a vitally important solution to the development challenges facing Southern California and growing cities across America. With careful planning, TOD is not just a label: TOD gives people good reason to leave their car behind and opt for transit. These are among the primary goals of the LACMTA Joint Development Program; staff members have worked to these ends for several years assisting in the planning needed to make this application.

While needed proprietary agreements have not yet been considered nor approved by the LACMTA Board of Directors, environmental approval of the Project would mark an important milestone. Studies currently being conducted by LACMTA include plans for new transit lines there, but the Metro Green Line Aviation/LAX Station remains unchanged with implementation of the Project by definition. The Project is also subject to both LACMTA statutory requirements and discretionary considerations to be addressed under separate cover.

We support the Project as it would fulfill or enhance a number of important objectives, including economic development in the area. In particular, the Project would also provide important services for transit patrons; these help make the individual transit experience more attractive and also contribute to increased ridership. Among other benefits, the Project also provides opportunities for workforce housing for an important nearby employment center.

We can be reached at (213)922-228 and are available to answer any questions regarding the application.

Sincerely yours,

Roger Moliere
Chief, Real Property Management and Development

Written Responses to:
Metropolitan Transportation Authority (Metro-1)
Letter dated February 10, 2011

Response Metro-1-1

This comment expresses support for the proposed Project and describes the benefits of transit-oriented development, but does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, no response is required. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.



Metro

February 24, 2011

Ms. Christina Tran
County of Los Angeles
Department of Regional Planning
Impact Analysis Section, Room 1348
320 West Temple Street
Los Angeles, CA 90012

Dear Ms. Tran:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Aviation Station project.

The Draft EIR satisfies the Traffic Impact Analysis (TIA) portions of Congestion Management Program (CMP) statutory requirements. However, the following required step for the analysis of development-related impacts to transit should be addressed in the Final EIR:

1. Information on facilities and/or programs that will be incorporated into the development plan that will encourage public transit usage and transportation demand management (TDM) policies and programs.

Although the Draft EIR addresses many of Metro’s concerns related to adjacent Metro right-of-way and operations including the Metro Green Line Light Rail, Park and Ride Lot, and bus layover facility, Metro reiterates the following concerns:

2. The applicant should be advised that the Metro Green Line Light Rail currently operates weekday peak service as often as every five minutes in both directions and that trains may operate, in and out of revenue service, 24 hours a day, seven days a week, adjacent to the proposed project’s northern boundary.
3. The DEIR identifies the Metro Green Line as a potential source of noise that may impact the proposed project. While DEIR Mitigation Measure 3.4-8 requires that prospective buyers of the proposed residential units be made aware that the units are within an “LAX noise influence area,” the noise impacts associated with the Metro Green Line should be explicitly included in that prospective buyer notification.
4. Plans for the proposed project shall comply with Metro Design Criteria, Section 5 Structural, and Volume III Adjacent Construction Design Manual. The final plans shall be reviewed by Metro to ensure that construction of tie-backs per Specifications Section 2162-Tieback Anchors, drainage, fencing, and other issues, including safety, associated with, and which may have an impact on, the railroad ROW are addressed.

METRO-2



5. Due to the proposed project's proximity to the Metro railroad ROW, construction activities may include encroaching on the ROW or digging adjacent to Metro Green Line support structures which could impact Metro property and equipment. Permits for special operations including the use of a pile driver or anything else that could come into close proximity to the electrified OCS (Overhead Catenary System) must be obtained at least one week prior to the start of construction. Permits allowing for single tracking or a power shutdown must be obtained at least two weeks prior to the start of construction. The contractor should contact the following regarding track allocation and/or special operations permits:

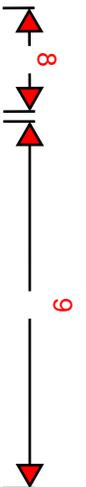
Hector Guerrero
Rail Division Transportation Manager
Rail Operations Control
323-563-5271

Although the proposed project is not expected to result in any long-term impacts on existing transit operations:

6. Rail Operations Control should be contacted at 323-563-5022 regarding the project's construction impacts on the Metro Green Line.
7. Several transit corridors with Metro bus service could be impacted by the project. Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines. Other Municipal Bus Service Operators may also be impacted and therefore should be included in construction outreach efforts.

In addition, the Final EIR should include the consideration of the following transit projects that are currently in the planning stages or are included in the Measure R Expenditure Plan approved by the voters of Los Angeles County in November, 2008:

8. The Crenshaw/LAX Transit Corridor, which will connect to the Metro Green Line near or adjacent to the project site via the BNSF railroad right-of-way.
9. The Metro Green Line Extension to Los Angeles International Airport, which would link the Metro Green Line to LAX. The specific route and technology are yet to be determined.
10. The I-405 Corridor Connection between the Metro Orange Line Sepulveda Station and the Metro Green Line Aviation Station. This transit project is in preliminary planning stages with a specific route and technology yet to be determined.
11. Although not included in the Measure R Expenditure Plan, a potential extension of the existing Metro Green Line passenger platforms so that trains may operate with an additional rail car.



Metro looks forward to reviewing the Final EIR. If you have any questions regarding this response, please call me at 213-922-2836 or by email at hartwells@metro.net. Please send the Final EIR to the following address:

Metro CEQA Review Coordination
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952
Attn: Scott Hartwell

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Hartwell", with a long horizontal flourish extending to the right.

Scott Hartwell
CEQA Review Coordinator, Long Range Planning

CC: Rachel Bird
Conan Cheung
Aspet Davidian
Roderick Diaz
Scott Greene
Hector Guerrero
Alexander Kalamaros
Timothy Lindholm
Bruce Shelburne
Irv Taylor
Cory Zelmer

**Written Responses to:
Metropolitan Transportation Authority (Metro-2)
Letter dated February 24, 2011**

Response Metro-2-1

In September of 2009, representatives of the Project Applicant met with Ms. Nelia Custidio of Metro to discuss various topics, including potential facilities and/or programs that could be incorporated into the Project to encourage the use of public transit and support transportation demand management (TDM) policies and programs. Several ideas were discussed, including the use of kiosks and other information-sharing options. However, with the common use of smart phone, personal digital assistants (PDAs) and tablets, that may make certain historic modes of information sharing outdated, it was determined that the specific facilities and/or programs would be determined at a later date. Accordingly, as stated in Metro's letter dated February 10, 2011, "the Project is also subject to both LACMTA statutory requirements and discretionary considerations to be addressed under separate cover."

Response Metro-2-2

This comment acknowledges the current train schedule at the Metro Green Line Aviation/LAX Station. This information does not alter the analysis of noise impacts set forth in Section 3.4 of the Draft EIR because noise measurements were taken at various locations throughout the Project site for short-term ambient noise levels, as well as at Location A (as shown on Exhibit 3.4-3 of the Draft EIR) for 24-hour ambient noise levels. These noise readings take into consideration the existing ambient noise levels at the Project site, which are incorporated into the noise impacts analysis presented in Section 3.4.5 Environmental Impacts of the Draft EIR.

Response Metro-2-3

Information regarding the fact that the Metro Green Line Aviation/LAX Station transit activities are a source of noise for the Project area will be explicitly included within MM 3.4-8, as set forth in Section 2.0, Errata.

Response Metro-2-4

Issues set forth in this comment are related to regulatory compliance. The Project Applicant must ensure that Project development is in compliance with all applicable regulatory requirements, in accordance with the law. Although no new or significant impacts have been identified, the requirements set forth by Metro related to compliance with Metro Design Criteria, Section 5 Structural, and Volume III Adjacent Construction Design Manual, review of the final plans by Metro for issues that may affect the Metro railroad right-of-way (ROW) are included as a new mitigation measure (MM 6.1-6), and the possible requirement to issue construction-related permits has also been added to the discussion of Discretionary Actions in Section 2.6.1 of the Draft EIR, as set forth in Section 2.0, Errata.

Response Metro-2-5

Issues set forth in this comment are related to regulatory compliance. The Project Applicant must ensure that Project development is in compliance with all applicable regulatory requirements, in accordance with the law. Although no new or significant impacts have been identified, the requirements set forth by Metro related to review of the final plans by Metro for issues that may affect the Metro railroad right-of-way (ROW), and consultation with the Rail Division Transportation Manager and Rail Operations Control, as well as the Metro Bus

Operations Control Special Events Coordinator and applicable Municipal Bus Service Operators, to determine if any construction-related permits are required are included as a new mitigation measure (MM 6.1-6), and the possible requirement to issue construction-related permits, including the use of construction equipment in proximity to the electrified Overhead Catenary System, has also been added to the discussion of Discretionary Actions in Section 2.6.1 of the Draft EIR, as set forth in Section 2.0, Errata.

Response Metro-2-6

Please see Response Metro-2-5.

Response Metro-2-7

As set forth in MM 5.1-5 in Section 5.1, Transportation/Access, the Project Applicant must demonstrate to the satisfaction of the County of Los Angeles and Metro that the relocated Metro bus terminal is fully operational prior to the removal of the existing Metro bus terminal located on Lot 2 of the Project site. This measure ensures that the existing bus service at the Metro bus terminal would not be disrupted as a result of Project construction because the existing ingress/egress and passenger access points would remain functional until the new location is fully operational. Additionally, regarding coordination with Metro related to construction activities that would affect the Project site and/or transit corridors, please see Responses Metro-2-4 and Metro-2-5.

Response Metro-2-8

The proposed Crenshaw/LAX Transit Corridor is a proposed 8.5-mile light rail line that will extend from the Crenshaw Boulevard/Exposition Boulevard intersection to the Metro Green Line's Aviation/LAX Station. From the Metro Green Line Aviation/LAX Station, the Crenshaw/LAX Transit Corridor Rail Line will provide direct access to the Exposition Transit Corridor Rail Line, currently under construction, as well as provide connections to the regional transit network system. The Crenshaw/LAX Transit Corridor Rail Line is considered a much needed alternative to the congested Interstate 405 and 110 Freeways and is expected to alleviate traffic conditions in the immediate study area.

The assumed build-out year for the Project is 2014, which has been incorporated into the traffic analysis contained in the Draft EIR (page 5.1-10 of the Draft EIR). By comparison, according to information provided in the December 2010 "Fact Sheet" on Metro's website for the Crenshaw/LAX Transit Corridor project (www.metro.net/crenshaw), the transit line is scheduled to begin operation in 2018. This start date is somewhat speculative as there are several important milestones that remain including preparation and certification of the project's environmental review studies, approval of the final design by the Metro Board, and obtaining funding to construct the project. Thus, on a conservative basis, the potential vehicular traffic flow reductions that may result from the Crenshaw/LAX Transit Corridor project have not been assumed in the traffic analysis provided in the Draft EIR since the transit project will likely be constructed many years after the build-out of the Project.

Response Metro-2-9

This comment sets forth future projects that are in the planning stages, including the Metro Green Line Extension to LAX, I-405 Corridor Connection, and the Metro Green Line passenger platform extension. As stated on page 2-18 of the Draft EIR, the Metro Green Line

Aviation/LAX Station located to the north of the Project site would remain unchanged with Project implementation. Additionally, as confirmed in Metro Comment Letter dated February 10, 2011, "Studies currently being conducted by LACMTA include plans for new transit lines there, but the Metro Green Line Aviation/LAX Station remains unchanged with implementation of the Project by definition." Therefore, Project implementation would have no impact on future Metro plans for additional transit at the Aviation/LAX Station.



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-Mailed: February 24, 2011
ctran@planning.lacounty.gov

February 24, 2011

Ms. Christina Tran
Los Angeles County
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

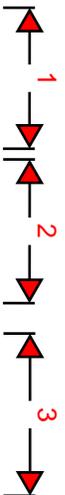
Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed Aviation Station Project

SCAQMD

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the final Environmental Impact Report (Final EIR) as appropriate.

Because the lead agency has determined that construction impacts are significant, the AQMD staff recommends that pursuant to Section 15370 of the California Environmental Quality Act (CEQA) Guidelines, additional mitigation measures are considered to minimize the project's significant air quality impacts during construction operations. Further, the AQMD staff recommends that the lead agency revisit the Local Significance Threshold (LST) analysis in the draft Environmental Impact Report (Draft EIR) as it appears that the approach used does not follow standard AQMD methodology. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise.



Please contact Bob Gottschalk, Air Quality Specialist at (909) 396-2456, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I" and "M".

Ian MacMillan

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

Attachment

IM:BG

LAC110111-01
Control Number

Mitigation Measures for Construction Air Quality Impacts

1. Given that the lead agency's construction air quality analysis demonstrates significant air quality impacts from PM10 and PM2.5 emissions due to exceedance of Local Significance Thresholds, the AQMD staff recommends that the lead agency provide additional mitigation pursuant to CEQA Guidelines §15370. Specifically, AQMD staff recommends that the lead agency minimize or eliminate significant adverse air quality impacts by adding the mitigation measures provided below.
 - Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow,
 - Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
 - Reroute construction trucks away from congested streets or sensitive receptor areas,
 - Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,
 - Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications,
 - Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export),
 - During project construction, all internal combustion engines/construction equipment operating on the project site shall meet EPA-certified Tier 2 emissions standards, or higher according to the following:
 - ✓ Project Start, to December 31, 2011: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 2 off-road emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ January 1, 2012, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available.

In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- ✓ A copy of each unit’s certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- ✓ Encourage construction contractors to apply for AQMD “SOON” funds. Incentives could be provided for those construction contractors who apply for AQMD “SOON” funds. The “SOON” program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:
www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

Local Significance Thresholds (LST) Methodology

2. Table 4.2-6 of the DEIR compares construction emissions from the project with Local Significance Thresholds (LST). The AQMD Mass Rate LST Look-up Tables are a function of receptor distance and the proposed disturbed area. Based on a receptor distance of 25 meters (nearest receptors located directly across Judah Ave. and 117th St. from project site), and a maximum daily project area of 1.25 acres during mass grading and fine grading operations, the appropriate LST for PM10 for this project is 6 lbs/day. This is derived by linear interpolation between the values from the table for 1 acre and 2 acres for source receptor area 3. Similarly, the appropriate LST for PM2.5 is 3.5 lbs/day. It appears that the Draft EIR incorrectly compares project emissions to LSTs derived from the 5 acre tables for PM10 and PM2.5.



**Written Responses to:
South Coast Air Quality Management District (SCAQMD)**

Response SCAQMD-1

Please see Response SCAQMD-4.

Response SCAQMD-2

Please see Response SCAQMD-5.

Response SCAQMD-3

In accordance with CEQA Section 21092.5, SCAQMD will be provided with written responses to all comments prior to action on the Final EIR by the Los Angeles County Regional Planning Commission and Board of Supervisors.

Response SCAQMD-4

The comment recommends that the lead agency provide additional construction-related mitigation to minimize or eliminate the forecast significant air quality impacts from PM10 and PM2.5 emissions due to exceedance of Local Significance Thresholds (LST). As defined in the SCAQMD *Final Localized Significance Threshold Methodology* (2008), the LST thresholds pertain to emissions from on-site sources, and not from off-site or on-road sources. The principal source of on-site construction-related PM10 and PM2.5 would be demolition and grading activities. Mitigation measure (MM) 4.2-1, included in Section 4.2 of the Draft EIR, requires compliance with the Best Available Control Measures of SCAQMD Rule 403, Fugitive Dust. MM 4.2-1 and Rule 403 include many specific measures to minimize the generation and off-site transport of fugitive dust. Although not indicated in the Air Quality section of the Draft EIR, it should be noted that MM 3.4-2, from the Noise section of the DEIR, requires construction of a 10-foot-high noise barrier along the eastern and southern boundaries of the Project site. This barrier will provide additional reduction of dust transport from the site to residences on West 117th Street and Judah Avenue, further reducing the impact.

In response to SCAQMD's request for additional mitigation measures related to significant air quality impacts, two additional MMs (MM 4.2-5 and MM 4.2-6) have been added to the Final EIR, as set forth in Section 2.0, Errata. The new MM 4.2-5 was suggested by SCAQMD via telephone conversation with BonTerra Consulting staff. The new MM 4.2-6 was recommended in the SCAQMD comment letter.

The other measures recommended by SCAQMD do not pertain to on-site generation of fugitive dust, but are appropriate for reducing exhaust emissions, principally NOx and diesel particulates, from on-road and off-road mobile sources. With the implementation of MM 4.2-2 on page 4.2-27 of the Draft EIR, the Project would not have significant NOx or diesel particulate impacts. MM 4.2-3 on page 4.2-27 of the Draft EIR incorporates some of the traffic control and engine maintenance measures included in the SCAQMD comment letter.

Response SCAQMD-5

The comment recommends revision to the methodology for calculating the LST construction emissions impacts. Based on further discussions with SCAQMD (Ian MacMillan and Robert Gottschalk, March 1, 2011), the LST analysis has been revised. MM 4.2-5 and MM 4.2-6,

provided in Section 2.0, Errata, have been incorporated into the Project to further reduce the potential for dust generation to the homes on West 117th Street and Judah Avenue, and to provide liaison between homeowners and the construction contractors. However, these revisions and additions do not change the Draft EIR findings of a significant and unavoidable impact related to local emissions of particulate matter for a short-term period of approximately 28 working days. Changes to the Draft EIR and associated Technical Report related to the revised LST analysis, as well as additional information on the methodology used in the Health Risk Assessment (HRA) are included in Section 2.0, Errata. This additional information amplifies and clarifies information provided in the Draft EIR and does not cause any new significant impacts.



WISEBURN SCHOOL DISTRICT

Tom Johnstone, Ed.D., Superintendent

Board of Trustees

Dennis Curtis, President • Nelson Martinez, Clerk
Susan Andriacchi, Member • Roger Bafuelos, Member • Israel Mora, Member

Juan De Anza • Peter Burnett • Juan Cabrillo • Richard Henry Dana

February 24, 2011

Christina Tam
Los Angeles County
Impact Analysis Section, Rm. 1348
320 West Temple Street
Los Angeles, CA 90012

Christina,

The Wiseburn Elementary School District has signed a Memorandum of Agreement with the proponent of the Aviation Station project which when incorporated into a Mutual Benefit Agreement will provide full and complete mitigation of the Aviation Station project on the Wiseburn Elementary School District.

The Wiseburn Elementary School District has no further comments on the D.E.I.R.

Sincerely,

Tom Johnstone
Superintendent

WSD



Written Responses to:
Wiseburn School District (WSD)

Response WSD-1

This comment acknowledges the execution of a Memorandum of Agreement with the Project Applicant which, when incorporated into a Mutual Benefit Agreement, would provide full mitigation of the Project impact on the Wiseburn School District. No response is required. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.



County of Los Angeles
Sheriff's Department Headquarters

4700 Ramona Boulevard
Monterey Park, California 91754-2169



Leroy D. Baca, Sheriff

February 17, 2011

Ms. Christina Tran
Impact Analysis Section
Los Angeles County
Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012



Dear Ms. Tran:

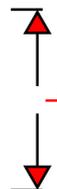
**REVIEW COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT FOR
THE AVIATION STATION PROJECT
COUNTY PROJECT NO. TR070853-(2);
SCH NO. 2009051097 / FPB NO. 10-055B**

LASD

This letter is transmitted in response to your Notice of Completion and Availability (NOC/NOA), dated January 10, 2011, for the Draft Environmental Impact Report (DEIR) for the Aviation Station Project (Project). The Project is located within both the unincorporated community of Del Aire of Los Angeles County, and the City of Los Angeles.

Thank you for including the Los Angeles County Sheriff's Department (LASD) in the environmental review process for the proposed Project. LASD's review comments on the document are provided in the attached correspondence, dated February 4, 2011, from Captain Matt Dendo, of LASD's South Los Angeles Station.

In summary, the Station has reviewed the DEIR and notes the document's accuracy with regard to comments previously submitted by LASD on the proposed Project. Although the Station has no additional comments to submit at this time, LASD and the Station reserve the right to bring forth other issues or concerns that may arise as the development process for the proposed Project moves forward.



Should you have any additional questions regarding this matter, please contact Mr. Lester Miyoshi, of my staff, at (626) 300-3012, and refer to Project No. 10-055B.

Sincerely,

LEROY D. BACA, SHERIFF

Gary T. K. Tse, Director
Facilities Planning Bureau



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner
Director

DATE: January 10, 2011

TO: All Interested County Departments

FROM: Christina Tran *CT*
DEPARTMENT OF REGIONAL PLANNING
Impact Analysis Section

SUBJECT: **DRAFT ENVIRONMENTAL IMPACT REPORT
AVIATION STATION PROJECT
COUNTY PROJECT NO. TR070853-(2)
VESTING TENTATIVE TRACT MAP NO. TR070853
CONDITIONAL USE PERMIT NO. RCUPT200900024
ZONE CHANGE NO. RZCT200900002
PLAN AMENDMENT NO. RPAT200900002
PARKING PERMIT NO. RPKPT201000008
AVIATION PERMIT NO. RAVT201000003
ENVIRONMENTAL NO. RENVT200900024
STATE CLEARINGHOUSE NO. 2009051097**

Enclosed is the Draft Environmental Impact Report (DEIR) for your information/file. On August 4, 2010, County departments were requested to review the Screencheck EIR for the above project.

All comments previously received on the Screencheck have been incorporated into the Draft Environmental Impact Report or will be made conditions of approval of the project. **No additional comment is solicited** unless your previous comments have not been adequately addressed. If you have any questions, please contact **Christina Tran** of the Impact Analysis Section at (213) 974-6461 Monday through Thursday from 7:30 a.m. to 5:30 p.m. Our offices are closed on Fridays.



Attachment(s)

**Written Responses to:
County of Los Angeles Sheriff's Department (LASD)**

Response LASD-1

This comment acknowledges that the Draft EIR has accurately incorporated comments previously submitted by LASD and no additional comments are required at this time. No response is required. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. No changes to the EIR are required.

Response LASD-2

This attachment is a Memorandum that was sent out with the Draft EIR to County departments. No response is required.

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City of El Segundo

Planning & Building Safety Department

Elected Officials:

Eric K. Busch,
Mayor
Bill Fisher,
Mayor Pro Tem
Carl Jacobson,
Council Member
Don Brann,
Council Member
Suzanne Fuentes,
Council Member
Cindy Mortesen,
City Clerk
Ralph Lanphere,
City Treasurer

Appointed Officials:

Jack Wayt,
City Manager
Mark D. Hensley,
City Attorney

Department Directors:

Deborah Cullen,
Finance/Human Resources
Kevin Smith,
Fire Chief
Debra Brighton,
Library Services
Greg Carpenter,
Planning and Building
Safety/Economic Dev.
Mitch Tavera,
Police Chief
Stephanie Katsouleas,
Public Works
Robert Cummings,
Recreation & Parks

www.elsegundo.org

February 24, 2011

Christina Tran
County of Los Angeles Regional Planning Department
Impact Analysis Section
320 West Temple Street, Room 1348
Los Angeles, CA 90012

RE: DRAFT Environmental Impact Report for the Aviation Station Project

Dear Ms. Tran:

El Segundo

The City of El Segundo appreciates the opportunity to review the Draft Environmental Impact Report (EIR) for the Aviation Station Project. The City would like to offer the following comments:

- Traffic Analysis–Intersections Studied.** The Draft EIR identifies that nine intersections are analyzed for Project related impacts. The number and location of intersections is inadequate for the size and scale of the project. The City suggested several additional intersections (please see attached NOP letter). At a minimum, the intersection of El Segundo Boulevard and Aviation Boulevard should be added to the intersection analysis as the Project could potentially have a significant impact on this intersection. This intersection meets the selection criteria identified in the EIR on Page 5.1-2. It is in close proximity to the Project site, it does have the potential for future operational issues, and it will be subject to a large percentage of project related turning movements. Project trips will pass through this intersection to the El Segundo Boulevard Interstate Highway 405 (I-405) on- and off-ramps. The existing and proposed site trip distribution diagrams in the EIR identify that 20% to 25% of Project trips could potentially travel through this intersection. Also, the City of El Segundo is aware that a large volume of trips currently travel eastbound through this intersection during peak periods to access the I-405.

of trips currently travel eastbound through this intersection during peak periods to access the I-405.

- 2) **Operational Truck Trips.** The City of El Segundo requests that there be a restriction of delivery trucks to the site during AM and PM peak periods, to minimize disruptions to commuter traffic. The City has no objections to evening or early morning delivery trips as there are no residential uses within the City of El Segundo on Aviation Boulevard.
- 3) **Building Identifier Signs.** The City of El Segundo is potentially concerned with the large size and the location of the Building Identifier signs (Type "A" and Type "B"). The Type A signs are identified as 16 feet wide by 53 feet in height and 31 feet above the building height. If those are the dimensions of the sign (16 by 53=848 square feet), then the City is concerned that these are excessively large signs for a primarily residential project. If the 53 foot dimension is the location in relation to the ground elevation, please clarify the description and also identify the size of the Building Identifier signs. The City has similar concerns about the Type "B" signs which are identified as 12 feet wide by 46 feet high, to the extent that they project above the building and are not compatible in size and scale.
- 4) **Hazard Notification.** There should be some discussion in the document that discloses manufacturing and fabrication activities are conducted in close proximity to the project site, including at the Northrop Grumman Corporation, and such operations may involve the use of certain hazardous or potentially hazardous materials. If Proposition 65 noticing is required for future real property owners and residential occupants of the project site then noticing of these individuals of the potential risk should be a required mitigation.
- 5) **Initial Street Tree Planting.** The required size of street tree plantings is inadequate for quick establishment of a mature landscape. The City requests that a street tree planting size of 24-inch box or greater be used along Aviation Boulevard and other major street frontage areas.
- 6) **Northbound Right Turn Lane at 116th Street.** Please clarify the lane width of the dedicated right turn lane into the main entrance of the Project site. The document identifies that a 4 foot street widening will occur to accommodate the new right turn lane (Page 2-11). What is the size of the new right turn lane? The City requests this lane be at least 12 feet in width and that the two northbound travel lanes maintain their existing width.
- 7) **City Boundary Map Error.** The City boundary lines for the City of El Segundo are not correct in Exhibit 2-2. The Los Angeles Air Force Base



has moved and the former location is now located within the City of Hawthorne.

- 8) **Cumulative Projects.** Item E-10 should be assigned to the City of Hawthorne. It is a residential project at the former LA Air Force Base site.

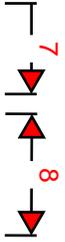
Thank you for the opportunity to comment on the Aviation Station Project EIR. If you have any questions regarding El Segundo's comments, please contact Kimberly Christensen, Planning Manager at (310) 524-2340 or Masa Alkire, Principal Planner at (310) 524-2371.

Sincerely,



Kimberly Christensen, AICP, Planning Manager
Planning and Building Safety Department

Cc: Greg Carpenter, Director, Planning and Building Safety
Jack Wayt, City Manager
Karl Berger, Assistant City Attorney
City Council





City of El Segundo

Planning & Building Safety Department

Elected Officials:

Kelly McDowell,
Mayor
Eric K. Busch,
Mayor Pro Tem
Carl Jacobson,
Council Member
Bill Fisher,
Council Member
Don Brann,
Council Member
Cindy Mortesen,
City Clerk
Ralph Lanphere,
City Treasurer

June 25, 2009

Christina Tran
County of Los Angeles Regional Planning Department
Impact Analysis Section
320 West Temple Street, Room 1348
Los Angeles, CA 90012

Appointed Officials:

Jack Wayt,
City Manager
Mark D. Hensley,
City Attorney

RE: Notice of Preparation for Aviation Station Project

Dear Ms. Tran:

Department Directors:

Bill Crowe,
Assistant City Manager
Deborah Cullen,
Finance
Robert Hyland,
Human Resources
Kevin Smith,
Fire Chief
Debra Brighton,
Library Services
Greg Carpenter,
Planning and Building
Safety
David Cummings,
Police Chief
Dana Greenwood,
Public Works
Robert Cummings,
Recreation & Parks

The City of El Segundo appreciates the opportunity to review the proposed Notice of Preparation for the Aviation Station Project. The City would like to offer the following comments:

1. The Draft Environmental Impact Report (EIR) must analyze the compatibility of proposed uses and proposed land use changes with the existing land uses in El Segundo west of the proposed project site and the uses and densities allowed in the El Segundo General Plan and El Segundo Municipal Code ("ESMC") development standards. The property to the west of the proposed project is located in the Urban Mixed-Use General Plan Land Use classification and in the Urban Mixed-Use North Zone. The El Segundo General Plan and the El Segundo Municipal Code is available on the City's web-site at www.elsegundo.org.

2. The Draft EIR must analyze any impacts of light and glare from the proposed project on the City of El Segundo to the west. Mitigation measures should require that all exterior lighting include shields to direct light downward.

www.elsegundo.org

3. El Segundo has significant concerns regarding the proposed outdoor advertising signs which are incompatible with El Segundo's sign regulations which do not permit large outdoor advertising signs (see ESMC Title 15). Large lighted digital and non-digital signs will create a potentially significant impact in terms of aesthetics, light and glare, and traffic hazards for the El Segundo community and adjacent businesses. These impacts must be fully studied in the EIR. Further, El Segundo recommends eliminating the three proposed digital and non-digital signs from the project to eliminate these impacts to the El Segundo community.
4. The Draft EIR should clarify and discuss the internal circulation and access to public streets of all uses within the project (both existing to remain and proposed) and associated traffic and circulation impacts. The traffic analysis in the EIR should provide a thorough discussion of any proposed modifications in the location of existing driveways along Imperial Highway and Aviation Boulevard. The EIR and plans should make it clear and analyze if driveways will have turn restrictions such as right-in/right-out restrictions and if westbound left hand turns will be allowed at the intersection of 117th Street and Aviation Boulevard.
5. The traffic analysis should also study the need for deceleration and acceleration lanes for any driveways on Aviation Boulevard and Imperial Highway.
6. Since the project has frontage on Aviation Boulevard and has potentially significant impacts on streets in El Segundo, the Draft EIR should prepare the Traffic Analysis so that it incorporates analysis using the City of El Segundo traffic significance thresholds established in the El Segundo Circulation Element.
7. The traffic analysis for the EIR should study the potential impact of the project on the level of service at intersections in El Segundo and all shared intersections on Aviation Boulevard between Imperial Highway and Rosecrans Avenue. Additionally, the City recommends that the following specific intersections also be studied:
 - a. Imperial Highway and Douglas Street
 - b. Imperial Highway and Nash Street;
 - c. Imperial Highway and Sepulveda Boulevard;
 - d. El Segundo Boulevard and Douglas Street;
 - e. El Segundo Boulevard and Nash Street; and,
 - f. El Segundo Boulevard and Sepulveda Boulevard.
8. The EIR should include recently approved and pending projects in the City of El Segundo as part of the cumulative analysis throughout the EIR. Attached is the City's list of major projects.
9. If any modifications to Aviation Boulevard are required, the City of El Segundo should be listed as a responsible agency in the EIR.

10. The traffic analysis in the EIR should include a discussion of how the project will mitigate its "fair share" contribution to cumulative impacts. Such discussion should include traffic mitigation fees to help fund projects along the Aviation and Imperial Highway Corridors (taking into account planned improvements in the El Segundo Circulation Element where applicable) which will benefit the project and both communities. See planned Improvements discussion in El Segundo Circulation Element Pages 4-16 through 4-19.
11. The Draft EIR should incorporate construction mitigation measures that limit truck haul routes for any truck trips within the city limits of El Segundo to the truck haul routes established in the El Segundo Circulation Element.
12. Construction mitigation measures must be incorporated that require trucks transporting soil off-site to tie down their loads with tarpulins and require washing of truck tires before entering public streets.
13. Construction mitigation measures must be incorporated that require watering down of the site daily to prevent carrying soil airborne off-site and covering any graded piles if winds exceed 15 miles per hour.
14. Construction mitigation measures should limit construction entrances to Imperial Highway and avoid Aviation Boulevard, if feasible.
15. Construction mitigation measures should address ESMC requirements addressing noise and vibration as specified in ESMC Chapter 7-2. This should include but not be limited to noise standards, noise level measurement, and specific prohibitions during certain hours.

Again thank you for the opportunity to comment on the Notice of Preparation. We look forward to reviewing the EIR upon its circulation. If you have any questions regarding El Segundo's NOP comments, please contact Kimberly Christensen, Planning Manager at (310) 524-2340.

Sincerely,



Kimberly Christensen, AICP, Planning Manager
Planning and Building Safety Department

Cc: Greg Carpenter, Director, Planning and Building Safety
Jack Wayt, City Manager
Bill Crowe, Assistant City Manager
Mark Hensley, City Attorney
Karl Berger, Assistant City Attorney
City Council

**Written Responses to:
City of El Segundo, Planning and Building Safety Department (El Segundo)**

Response El Segundo-1

As stated in page 5.1-2 of the Draft EIR (page 3 of Appendix H-Traffic Analysis), a study area is generally comprised of those locations that have the greatest potential to experience significant traffic impacts due to the proposed Project as defined by the Lead Agency. In the traffic engineering practice, the study area generally includes those intersections that are:

- a. Immediately adjacent or in close proximity to the project site;
- b. In the vicinity of the project site that are documented to have current or projected future adverse operational issues; and
- c. In the vicinity of the project site that are forecast to experience a relatively greater percentage of project-related vehicular turning movements (e.g., at freeway ramp intersections).

In review of the traffic analysis study area shown on Exhibit 5.1-1 of the Draft EIR (Figure 1-1 on page 2, Appendix H), the intersections selected for analysis are consistent with the criteria noted above. The traffic analysis study area included several intersections immediately adjacent to the Project site, key intersections in the Project vicinity that may have existing or future operational issues and a relatively higher percentage of Project-related turning movements (e.g., Aviation Boulevard/West Imperial Highway, La Cienega Boulevard/West Imperial Highway, etc.), as well as intersections located at important freeway ramp intersections (e.g., La Cienega Boulevard/I-405 Freeway Southbound On-Off Ramps [North of Imperial Highway], La Cienega Boulevard/I-405 Freeway SB On-Off Ramps [South of 120th Street], and I-105 Freeway On-Off Ramps/Imperial Highway). Therefore, the traffic study area used in the Draft EIR is sufficiently comprehensive to evaluate and identify the potential significant traffic impacts related to the Project. The locations selected for analysis were based on the above criteria, the Project land uses and corresponding peak hour vehicle trip generation, the anticipated distribution of Project vehicular trips, and existing operations at key intersections and corridors in the vicinity of the Project site.

In addition, elements of the Traffic Study contained in Appendix H of the Draft EIR, including the number and location of the study intersections, were reviewed and approved by County of Los Angeles Department of Public Works Traffic & Lighting Division staff. The Traffic Study was prepared in conjunction with County of Los Angeles Department of Public Works Traffic & Lighting Division staff (the Lead Agency for review of the Project).

Furthermore, as concluded in the Traffic Study, and stated on page 5.1-18 of the Draft EIR, none of the study intersections were deemed to be significantly impacted due to the Project. Given that none of the study intersections, which are proximate to the Project site, resulted in significant impacts, it is reasonable to assume that it would not be necessary to extend the study area to include additional intersections located further away from the project site as trips (and impacts) tend to dissipate further away from the Project site. It is specifically noted that no significant traffic impacts due to the Project are noted in Table 5.1-4, page 5.1-16 in the Draft EIR at Intersection No. 4: Aviation Boulevard/120th Street, which is located north of the Aviation Boulevard/El Segundo Boulevard intersection (i.e., Intersection No. 4 is closer to the Project site than Aviation Boulevard/El Segundo Boulevard).

Response El Segundo-2

The number of delivery trucks servicing the Project site on a daily basis would be nominal and is not anticipated to have any impact on peak traffic. The Draft EIR provides the trip generation forecast for the Project in Table 5.1-3 on page 5.1-12. It is noted that the forecast includes all vehicle trips (cars and trucks) generated by the Project, as well as all population groups (e.g. residents and visitors to the residential component; patrons and employees of the commercial component; service vehicles, including deliveries, etc.)

All of the potential Project-related trips, including trucks, have been considered in the traffic analysis provided in Section 5.1, Traffic/Access of the Draft EIR. As concluded in the Traffic Study, and stated on page 5.1-18 of the Draft EIR, none of the study intersections were deemed to be significantly impacted due to the Project. Therefore, the suggested mitigation measure to limit travel by trucks to periods outside of the commuter peak hours is not required.

Additionally, as stated in MM 3.4-5 in the Draft EIR, the Project Applicant must specify in the contract for each operator of a commercial space that (1) the operator shall require delivery trucks to enter and exit the Project site from the Aviation Boulevard driveway and (2) Truck deliveries shall be restricted to the daytime hours (7:00 AM to 10:00 PM). Therefore, late evening or early morning delivery trips would be in direct conflict with the mitigation requirements set forth in the Draft EIR, and could result in greater noise-related impacts.

Response El Segundo-3

The visual character of both the type “A” and “B” signs is illustrated in Appendix G-2 of the Draft EIR, the *Project Identity, Entrance and Retail Signage Standards*. Specifically, pages 2, 3, 12, 13, and 14 of Appendix G-2 describe the design and placement, as well as provide examples, of the type “A” and “B” signs proposed for the Project. The type “A” building identifier signs would not extend 31 feet above the building height. As stated on page 4.4-12 of the Draft EIR, the type “A” sign is a building-mounted vertical sign extending out from the top and down the face of the building. The 31 feet referenced are the extension along the top face of the building, rather than a further vertical extension. Additionally, these sign types would be placed on the north and east sides of the Project, as indicated in Appendix G-2 and Section 4.4, which includes commercial land uses.

While the Project provides high-density residential units, it is a mixed-use project and the signage program is intended to reflect this mixture. Also, as discussed in Section 4.4, the building identifier signs are intended to be large-scale architectural elements that harmonize with and contribute to the overall architectural style in a visually pleasing way. Finally, as discussed on page 4.4-14 of the Draft EIR, in compliance with MM 4.4-3, a signage plan shall be submitted to the County of Los Angeles Department of Regional Planning for review and approval. Project signage shall be designed and implemented in compliance with all applicable Los Angeles County standards and requirements.

Response El Segundo- 4

It is understood that manufacturing and fabrication activities are conducted at the Northrop Grumman facility in proximity to the Project site. The Draft EIR accurately describes the Project’s environmental setting as an urban infill Project site, situated between an established single-family residential and strip-commercial neighborhood and extensive aviation-related industry and LAX, including the Northrop Grumman campus.

Under the Safe Drinking Water and Toxic Enforcement Act of 1986 (better known as Proposition 65) and Assembly Bill (AB) 2588, business owners are required to give a clear and reasonable warning before knowingly exposing anyone to a chemical listed by the State as known to cause cancer, birth defects, or other reproductive harm. These notices must be conspicuously provided, such as on a posted sign, a mailed written notice and/or a public media announcement to occupants of the affected area at least once every three months (27 Cal Code Regs §§ 25601, 25605.1). Proposition 65 notices are the responsibility of business owners who knowingly expose people to listed chemicals. For example, if a landlord is aware of exposure and/or Proposition 65 notices, the landlord is obligated to give a Proposition 65 warning regardless of whether the landlord is responsible for the hazardous exposure.

Proposition 65 is not a permitting issue—it is required by law. Northrop Grumman has issued Proposition 65 notices in the past and will likely continue to do so, and the Project Applicant is aware of the Proposition 65 notices issued by Northrop Grumman. Therefore, while the Project itself would not result in the issuance of Proposition 65 notices, the Project Applicant is obligated by law to inform prospective apartment tenants and condominium purchasers of the issuance of notices by Northrop Grumman.

Response EI Segundo-5

The proposed plant palette for the Project, provided as Exhibit 2-13 in the Draft EIR, indicates that the majority of trees to be planted along Aviation Boulevard, West 117th Street, Judah Avenue, and the retail promenade/Fire Lane facing the Metro Green Line would be a minimum of 24-inch boxes up to 48-inch box and the palm trees (measures in brown truck height [bth]) would range from a minimum of 6 feet to 22 feet bth. This is in concurrence with the requested tree planting size. Hollywood juniper, compact Carolina cherry, and Indian hawthorne would be planted as 15-gallon specimens, as these are smaller scale plants at maturity compared to the planned street trees and palms.

Response EI Segundo-6

As part of the Project, the east side of Aviation Boulevard along the Project frontage will be improved to County Secondary Highway standards, which requires a 32-foot wide half roadway and 40-foot wide half right-of-way, as measured from the Aviation Boulevard centerline. To provide the required improvements, the east side of Aviation Boulevard would be widened by one foot from West 117th Street to the northerly property boundary. In addition, a concurrent dedication of four feet on the east side of Aviation Boulevard would be provided.

No changes to the lane configurations of the northbound approach of the Aviation Boulevard/West 116th Street (Project driveway) are proposed as part of this improvement. Instead, the proposed widening of Aviation Boulevard would provide an 11-foot wide through lane and a 21-foot wide through/right-turn lane as compared to the existing half roadway width of 31 feet. While a 21-foot wide through/right-turn lane would be sufficiently wide to allow two cars to queue side-by-side (i.e., one through vehicle and one right-turn vehicle), the Traffic Study contained in Appendix H of the Draft EIR conservatively does not assume the provision for a separate northbound right-turn lane on Aviation Boulevard at the West 116th Street intersection. Text that erroneously references the northbound right-turn lane in Section 2.3, Project Description of the Draft EIR has been eliminated, as shown in Section 2.0, Errata.

Response El Segundo-7

Exhibit 2-2, Adjacent Jurisdictions, has been corrected to reflect the Los Angeles Air Force Base's current location within the City of Hawthorne, and is provided in Section 2.2 of this document.

Response El Segundo-8

Table 2-4, Cumulative Projects, has been corrected to reflect the location of item E-10 in the City of Hawthorne instead of El Segundo, as set forth in Section 2.0 Errata. Additionally, revised Exhibit 2-16, Location of Cumulative Projects, located within Section 2.2 of this document, reflecting the LA Air Force Base A within the City of Hawthorne as "H3".

Response El Segundo-9

This attached comment letter is a re-submittal of the commenter's June 25, 2009 response to the Notice of Preparation. A copy of this original letter is included in Appendix A of the Draft EIR. These comments were taken into consideration in the preparation of the Draft EIR, which addresses and responds to these comments to the fullest extent possible. Also, please refer to Responses El Segundo-1 through El Segundo-8.

CITY OF HAWTHORNE



4455 West 126th Street • Hawthorne, California 90250-4482

Department of Public Works, Engineering Division
Office: (310) 349-2980 / Fax: (310) 978-9862

March 3, 2011

Christina Tran
County of Los Angeles Regional Planning Department
Impact Analysis Section
320 West Temple Street, Room 1348
Los Angeles, CA 90012

RE: Draft EIR – Aviation Station Project

Dear Ms. Trans,

HAWTHORNE

Thank you for giving us the opportunity to review the Draft EIR for the Aviation Station Project. We have completed the review and have the following comments:

1. The Draft EIR shall provide the ICU calculation in the appendix.
2. The Draft EIR shall provide more explanation in the determination of the 30% pass-by discount (Page 5.1-12, Table 5.1-3).
3. The Draft EIR shall analyze the following intersections for project impact.
 - a. Aviation Blvd. and El Segundo Blvd. – 20% of project traffic egress onto Aviation south of 120th St. and 25% of traffic ingress to project site utilizing Aviation Blvd. south of 120th.
 - b. Imperial Hwy. and Inglewood Ave. – 15% of the project traffic egress on Imperial Hwy. east of La Cienega Blvd. and 5% of traffic ingress to project site utilizing Imperial Hwy. east of La Cienega Blvd.



Please feel free to contact me or my staff, Alan Leung at 310-349-2997 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Arnold Shadbeh".

Arnold Shadbeh, P.E.
Director of Public Works/City Engineer

MAR - 7 2011

**Written Responses to:
City of Hawthorne, Department of Public Works, Engineering Division (Hawthorne)**

Response Hawthorne-1

The ICU calculations are contained in the appendices to the Traffic Study, which is contained in Appendix H of the Draft EIR.

Response Hawthorne-2

The comment refers to the 30 percent pass-by trip adjustment applied to the commercial component of the Project, as described in Table 5.1-3, page 5.1-12 of the Draft EIR. As noted in Table 5.1-3, the pass-by trip adjustment was derived based on data provided in the Trip Generation Handbook published by the Institute of Transportation Engineers (ITE). Pass-by trips are identified as vehicles that are already driving by the site today (e.g., on Aviation Boulevard) that would in the future visit the Project site; therefore, pass-by trips are not new vehicle trips generated by the Project.

The pass-by factors recommended by ITE are based on data collected at other commercial centers. Using the regression equation provided on Figure 5.5, page 47 of the ITE manual, and applying the size of the commercial component of the Project, a pass-by trip adjustment of up to 57 percent could have been applied to the trip generation forecast provided in the Draft EIR. However, to provide a conservative analysis, the lower 30 percent pass-by factor was utilized in the Traffic Study provided in the Draft EIR, thereby increasing the forecast number of new vehicle trips generated by the Project on the local street system.

Response Hawthorne-3

Please see Response El Segundo-1. With respect to the Aviation Boulevard/El Segundo Boulevard intersection, it is noted that no significant traffic impacts due to the Project are noted in Table 5.1-4, page 5.1-16 in the Draft EIR at Intersection No. 4: Aviation Boulevard/120th Street, which is located north of the Aviation Boulevard/El Segundo Boulevard intersection (i.e., Intersection No. 4 is closer to the Project site than Aviation Boulevard/El Segundo Boulevard). Thus, the analysis of the Aviation Boulevard/El Segundo Boulevard intersection is not required.

Response Hawthorne-4

Please see Response El Segundo-1. With respect to the Inglewood Avenue/Imperial Highway intersection, it is noted that no significant traffic impacts due to the Project are noted in Table 5.1-4, page 5.1-16 in the Draft EIR at Intersection No. 7: La Cienega Boulevard/Imperial Highway, which is located west of the Inglewood Avenue/Imperial Highway intersection (i.e., Intersection No. 7 is closer to the Project site than Inglewood Avenue/Imperial Highway). Thus, the analysis of the Inglewood Avenue/Imperial Highway intersection is not required.

CITY OF LOS ANGELES
CALIFORNIA

AMIR SEDADI
INTERIM GENERAL MANAGER



ANTONIO R. VILLARAIGOSA
MAYOR

DEPARTMENT OF
TRANSPORTATION
100 S. Main Street, 10th Floor
LOS ANGELES, CA 90012
(213) 972-8470
FAX (213) 972-8410

Los Angeles County
Aviation Station Project - DEIR
LADOT Case No. OUT 11-001

March 9, 2011

County of Los Angeles
Department of Regional Planning
Attention: Christina Tran
320 W. Temple Street
Los Angeles, CA 90012

LADOT

**LOS ANGELES COUNTY AVIATION STATION PROJECT, DEIR [SC#2009051097] -
LADOT ASSESSMENT OF PROJECT TRAFFIC IMPACT ANALYSIS**

In response to the recently released Draft Environmental Impact Report (DEIR), dated January 2011, regarding the proposed Los Angeles County Aviation Station Project, the City of Los Angeles Department of Transportation (LADOT) is forwarding this communication for inclusion into the project's final environmental impact review process. After completing a review of the information provided in the project traffic impact analysis, LADOT has determined that the project traffic study adequately describes the potential project related traffic impacts of the proposed development and is therefore in general agreement with the study finding that there will be no significant impact to City of Los Angeles street system adjacent to the project. However, there are aspects of the project that will require further coordination with LADOT staff, each of which is discussed below.

DISCUSSION AND FINDINGS

The land-use configuration of the proposed project has been identified in the traffic study and DEIR as follows:

Lot 1

- Condominiums / Townhomes: 281 Dwelling Units
- Retail / Commercial: 5,000 Square Feet

Lot 2

- Apartments: 112 Dwelling Units
- Retail / Commercial: 21,500 Square Feet

In conjunction with the land-use parameters stated above, it is anticipated that the project will



generate a net increase of 1,114 daily vehicle trips, 171 (28 inbound and 143 outbound) AM peak hour vehicle trips and 83 (48 inbound and 35 outbound) PM peak hour vehicle trips and it is these trip generation projections that form the basis for LADOT’s agreement with the study findings that the proposed development will create no significant impact to the City of Los Angeles street system adjacent to the project.

RECOMMENDATIONS

New Traffic Signal

Although the project traffic impact study concluded that no significant impacts will occur at any of the City of Los Angeles intersections analyzed in the report , the study does include a recommendation to implement traffic signal control at the existing Caltrans maintenance driveway, located approximately midway between Aviation Boulevard and the I-105 Freeway Ramps on the south side of Imperial Highway. Because the traffic signal system within this stretch of Imperial Highway is under the City of Los Angeles’ jurisdiction, implementation of this proposed measure will require LADOT approval. As such, please insure that the FEIR includes the following direction:

- 1) The project shall be responsible for contacting LADOT’s Western District Operations Office to facilitate the review and approval of the traffic signal control proposed for the project serving driveway, located approximately midway between Aviation Boulevard and the I-105 Ramps on the south side of Imperial Highway, as identified in the traffic study report. If approved, the design and implementation of the traffic signal shall be the sole responsibility of the project.
- 2) If approved, the implementation of this improvement must be guaranteed through the City of Los Angeles B-Permit process, with construction of the improvements completed and approved prior to the issuance of any certificate of occupancy for the development. In addition, prior to setting the bond amount for the B-Permit, the project engineer shall be required to contact LADOT’s B-Permit coordinator at (213) 928-9691 to arrange a pre-design meeting and finalize the design for the improvement.

Driveway Access

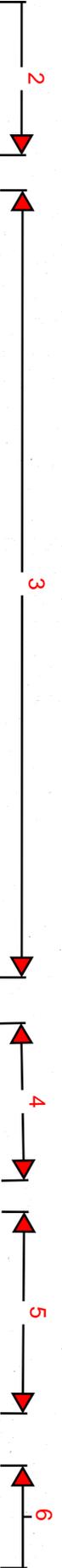
The review of this study does not constitute approval of the driveway access and circulation scheme. These require separate review and approval and should be coordinated through LADOT’s Citywide Planning Coordination Section (201 N. Figueroa Street, 4th Floor, Station 3 @ 213-482-7024).

Construction Impacts

Prior to the start of any construction work that will require the use of City of Los Angeles streets, a construction work site traffic control plan should be submitted to LADOT’s Western District Office for review and approval . If applicable, the plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. LADOT also recommends that construction related traffic be restricted to off-peak hours.

FINAL COMMENT

Please note that the commentary submitted above has been provided at great expense to



LADOT's development review services. Because LADOT was only recently informed of the DEIR release, other office responsibilities were put on hold in order to provide the expedited service needed to meet the project's current environmental review schedule. Therefore, for all future development projects, please be advised that the Bureau of Planning and Land Use Development is the office within LADOT that is responsible for reviewing development projects. Also, as a matter of practice, LADOT would prefer to be involved in EIR level projects prior to the release of the DEIR document and preferably during the execution of the project traffic impact analysis process.

Thank you for your consideration regarding all of the above and if you have any questions, please feel free to contact me or Shozo Yoshikawa of this office, at (213) 485-1062.

Sincerely,



EDWARD GUERRERO JR., Transportation Engineer
LADOT - West L.A. / Coastal Development Review

cc: Council District 11
Jay Kim, Sean Haeri, John Varghese, Michael May, Taimour Tanavoli, LADOT
Mike Patonai, L.A. Bureau of Engineering
David Shender, LLG, Inc.

**Written Responses to:
City of Los Angeles, Department of Transportation (LADOT)**

Response LADOT-1

The comment provides a summary and states its concurrence with the analysis, findings and conclusions related to Section 5.1 Traffic/Access contained in the Draft EIR. No response is required. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Response LADOT-2

This comment acknowledges the information and analysis set forth in the Section 5.1 Traffic/Access and Appendix H the Draft EIR. No response is required. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. It is noted that the Draft EIR identifies 278 residential units and 8,000 sf of retail/commercial land uses in Lot 1 (rather than 281 units and 5,000 sf). However, as the LADOT's comments are based on the correct trip generation of a net increase of 1,114 daily trip ends, the associated consensus on the conclusions of the Project traffic analysis are based on accurate information for purposes of potential impacts to City transportation facilities.

Response LADOT-3

The comment refers the installation of a traffic signal on Imperial Highway at the intersection of the existing Caltrans driveway as described in MM 5.1-2 on page 5.1-29 through 5.1-31 of the Draft EIR. This comment acknowledges that the proposed traffic signal at the south side of Imperial Highway is under the jurisdiction of the City of Los Angeles. As such, MM 5.1-1 on page 5.1-29 of the Draft EIR has been revised to include the City of Los Angeles, as set forth in Section 2.0 Errata. Also, this comment specifies that the Project Applicant must contact LADOT's Western District Operations Office regarding this traffic signal, and the implementation of the traffic signal be the sole responsibility of the Project Applicant. As such, the portion of MM 5.1-2 regarding this traffic signal has been revised to include these requirements, as set forth in Section 2.0, Errata.

Response LADOT-4

MM 5.1-2 on page 5.1-29 of the Draft EIR has been revised to reflect the requirement to coordinate with the LADOT's Citywide Planning Coordination Section for review and approval of proposed driveways and other circulation features that would affect City of Los Angeles roadways, as set forth in Section 2.0, Errata.

Response LADOT-5

As required in MM 6.1-5 of the Draft EIR, before the start of construction, Worksite Traffic Control Plans (WTCP) and Traffic Circulation Plans, including identification of detour requirements, shall be prepared in cooperation with the County of Los Angeles, the City of Los Angeles, and other affected jurisdictions in accordance with the Work Area Traffic Control Handbook (WATCH) manual and Manual on Uniform Traffic Control Devices (MUTCD), as required by the relevant jurisdiction. Construction activities shall comply with the approved WTCP to the satisfaction of the affected jurisdictions.

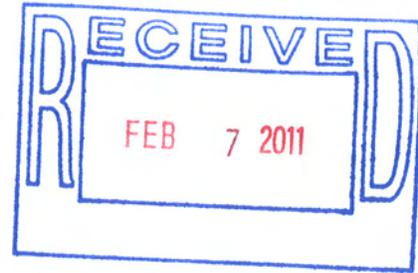
Response LADOT-6

This comment acknowledges that the Bureau of Planning and Land Use, within the Department of Transportation, is responsible for reviewing development projects and expresses the City's preference to be involved in the EIR process prior to the release of the DEIR document. No response is required. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

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February 7, 2011

County of Los Angeles
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012



RE: Proposed Aviation Station Development
County Project No. TR070853 -(Z)

Honorable Commissioners:

DANA

The Del Aire Neighborhood Association believes that the proposed development is a positive improvement to our community. We recognize the need to develop transit oriented residential units in our community, as well as the surrounding communities.

This proposed development will have a profound and permanent impact on our working class community of single-family homes. For this reason we need to get this right the first time.

I respectfully request that this Commission hold a hearing in our community before deciding to approve or deny the entitlements for this development.

Over the last year and a half, I have had many conversations with the property owner, his attorney and architects. This relationship has been respectful and open and very welcome. However, the traffic and parking mitigation issue came to an impasse very early on and we have not been able to resolve them.

The EIR study of nine key intersections (page 5.1.2) completely ignores the path of least resistance, the direct corridor through the middle of our neighborhood, from La Cienega and the 405 freeway to 120th Street West, to Judah Avenue North, to 117th Street West and directly into the underground parking for this development (see Map A).

The study assumes that all ingress and egress will be directly to and from Aviation Blvd., by way of 117th Street. The only mitigation measure proposed has been to limit egress to right turn only and ingress to left turn only. This woefully inadequate measure completely ignores the high likelihood of motorists entering from the east, and heading west on 117th Street.

I have proposed constructing a cul-de-sac on 117th Street, just east of the underground parking entrance that is proposed. This entrance is right in front of six single-family homes (see Map B). I have conducted an informal survey of the affected residents on 117th and received near unanimous agreement that a cul-de-sac would be necessary.



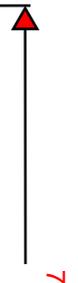
Many motorists will travel west on 120th having just exited the 405 freeway and rather than wait for the light and/or for traffic to clear at Aviation Blvd., they will simply turn north on Judah then west on 117th. This is currently the most popular route as there are no traffic signals or stop signs and the street is 6-lanes wide. This substantial increase of traffic through our quiet neighborhood will be devastating.



Given the size and scope of this project we feel that requesting one cul-de-sac on one street is not only a modest request, it is reasonable. The developer has rejected this idea.



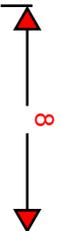
In addition to the problem of through traffic down the middle of our neighborhood, there is the parking issue.



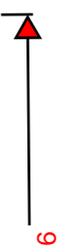
The assertion in the EIR that “the project would not result in excessive on-street parking and no significant impact would result” (Page 5.1.27-paragraph 2) is wishful thinking given that this development will remove 10 or so single-family homes with driveway parking, replacing them with 20 street level town homes with no driveways. This by itself, will decrease the availability of congestion on-street parking. These 20 new residences by themselves will create more competition for on-street parking. The only mitigation offered for the on-street parking that according to the EIR “will not happen”, are parking permits for our existing residents. This is inadequate and unacceptable, as this simply shifts the mitigation burden to the existing residents and their guests. This idea also simply pushes the problem south to the nearest non-permitted street.



As a member of the Community Advisory Council that meets with Capt. Matt Dendo, of LACSD once a month, I can assure you that the LA County Sheriff is not able to run out to our neighborhood to enforce the current parking problems as they stand. They do not have the staff required. Who will enforce this idea, and how much extra frustration are we expected to endure as we call the Sheriff over and over, only to receive spotty enforcement?



Currently there is a pedestrian opening at 116th and Judah (see Map C) that allows our community to be used as an overflow parking lot for the Park and Ride at the Metro. This has been an ongoing problem for many years. Couple that with 390 new residential units, 30,000 square feet of retail and the afore mentioned 20 town homes without driveways to park in and it is easy to picture the irreparable harm that this would cause our small neighborhood in the way of parking.



I have been told by the developer that the County wants to leave that open for community access to the new retail, etcetera. Realistically speaking this would only create a slight advantage, (a ½ block shorter walk) for 12 to 15 homes. The alternative is to simply pick



any street, walk west to Aviation Blvd. and enter the front of the facility, a roughly equal walking distance. Leaving the pedestrian opening at 116th and Judah is of no benefit to our community.

We have not demanded a reduction in density, or a reduction in height. We have not demanded more parking spaces. We have not sought a monetary mitigation fund. We are not calling for the project to stop. We are only asking that a few relatively modest measures be added to adequately address the parking and traffic issues unique to our neighborhood.

Considering that this is a \$200 million project, our request for one cul-de-sac on one street to protect our neighborhood is extremely modest. For the developer to simply propose installing a few street signs, some speed bumps, or set up a parking permit program appears more like an unimaginative afterthought with more emphasis on saving a buck, than saving the integrity of our community

We respectfully request that any decision on this development be postponed until:

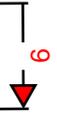
- A. A hearing is held in our neighborhood so that our working class community can voice their concerns;
- B. the issue of a cul-de-sac to address through traffic and parking, are adequately addressed;
- C. the closure of pedestrian access to prevent the overflow parking problem is adequately addressed.

Should this Planning Commission decide to open a hearing in our community (at Juan de Anza Elementary School), the Del Aire Neighborhood Association will proactively encourage the members of our community to be respectful and follow all protocols for a public hearing.

Thank you for your time and consideration in this matter.

Sincerely, 

John Koppelman, President
Del Aire Neighborhood Association



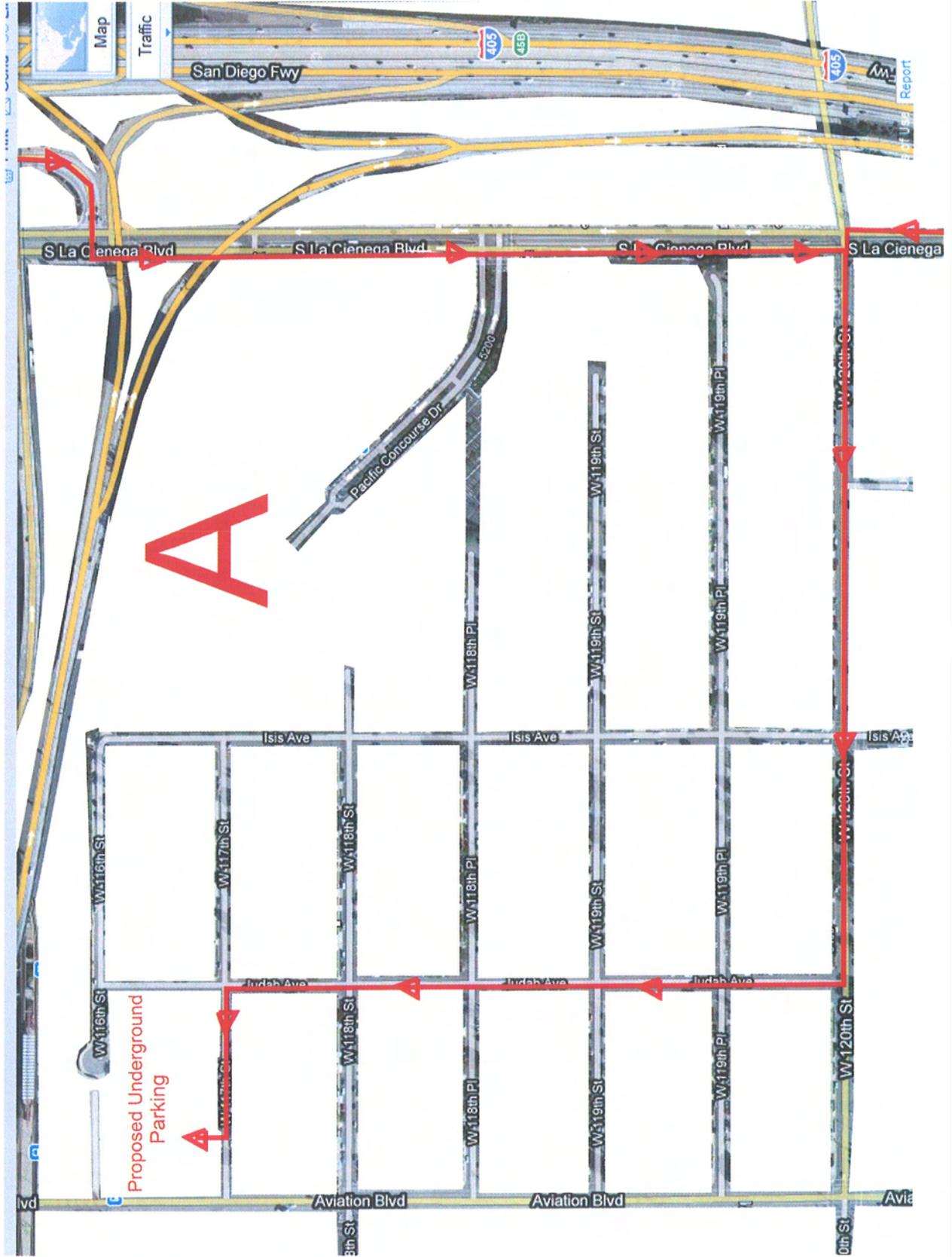
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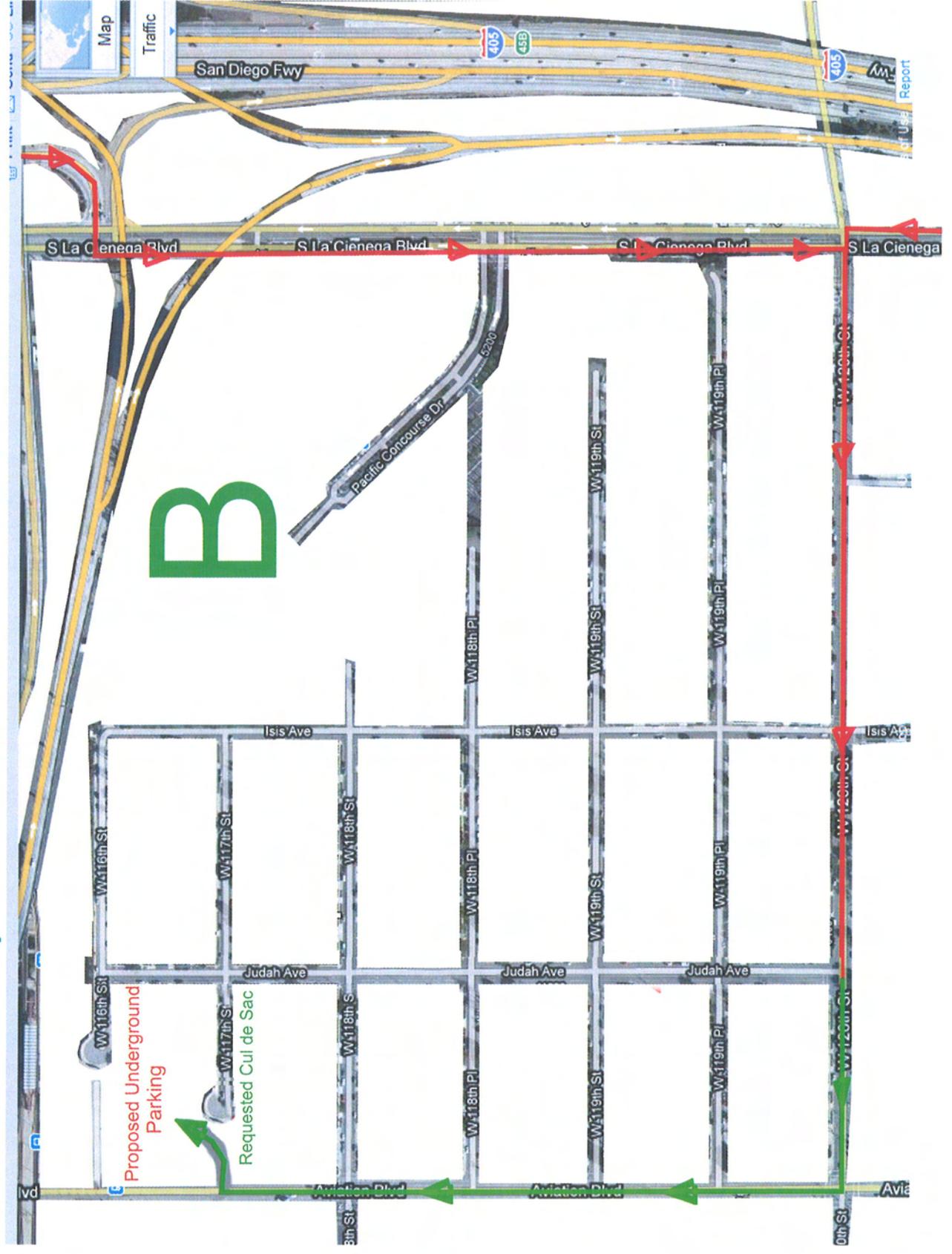
Relevant Area – Del Aire



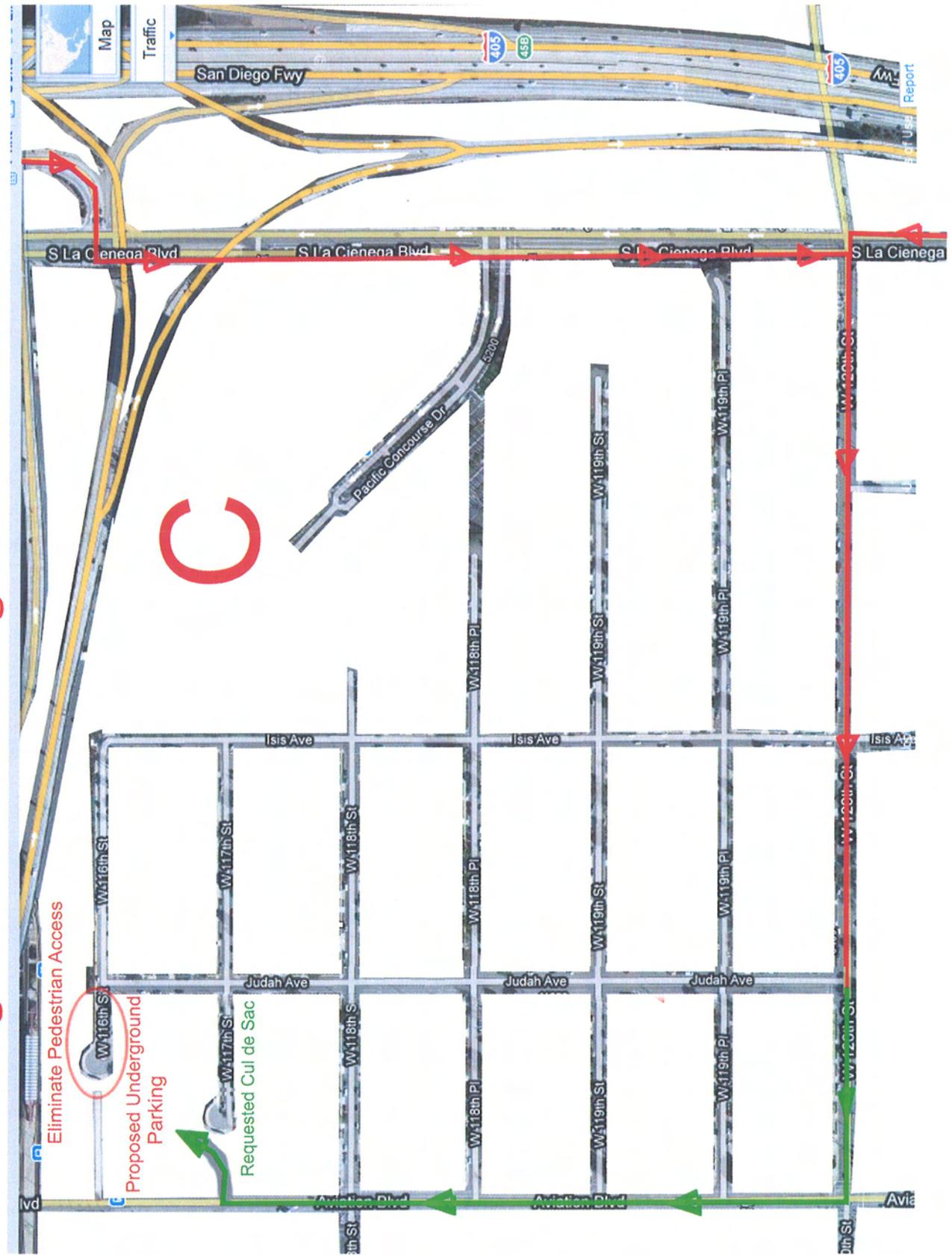
Map A – Path of Least Resistance From La Cienega and/or 405 Freeway



Map B – Desired Traffic Flow Created by Addition of Cul de Sac on 117th Street



Map C – Eliminate Pedestrian Access to Prevent Neighborhood Parking for MTA and Retail



**Written Responses to:
Del Aire Neighborhood Association (DANA)**

Response DANA-1

This comment acknowledges the Del Aire Neighborhood Association's general support of the Aviation Station Project, with the exception of certain issues related to parking and traffic. At the Planning Commission Meeting held on Wednesday, February 15, 2011, the Project Applicant was directed to hold an additional neighborhood meeting to discuss the issues presented in the DANA letter and at the Planning Commission meeting. This neighborhood meeting was held at the Del Aire Park Gymnasium on Saturday, March 26, 2011.

Response DANA-2

Please see Response EI Segundo-1. The Project trip distribution and assignment methodology is discussed on page 5.1-12 and 5.1-13 of the Draft EIR and on page 30 of Appendix H of the Draft EIR. The trip distribution percentages for the study intersections associated with the proposed Project are provided in Exhibit 5.1-7 in the Draft EIR and on page 34 of Appendix H of the Draft EIR. The AM and PM Project-only traffic volumes are shown in Figures 5.1-8 and 5.1-9 of the Draft EIR (Figures 6-5 and 6-6 on pages 35 and 36 of Appendix H of the Draft EIR), respectively. The Project trip distribution and assignment were reviewed and approved by County of Los Angeles Department of Public Works Traffic and Lighting staff.

The existing site uses and the redistributed Metro Green Line Station bus terminal traffic were also considered in the determination of the forecast net Project traffic volumes for study intersections. The trip distribution percentages for the study intersections associated with the existing uses are provided in Exhibit 5.1-6 in the Draft EIR and on page 31 of Appendix H of the Draft EIR. The forecast net new AM and PM Project traffic volumes are shown in Figures 6-7 and 6-8 on pages 37 and 38 of Appendix H of the Draft EIR, respectively. The existing Project site trip distribution and assignment and the Metro Green Line Station bus terminal traffic redistribution methodology were reviewed and approved by County of Los Angeles Department of Public Works Traffic and Lighting staff.

Vehicular access to the Project site is planned to be provided via driveways on Aviation Boulevard and West 117th Street. The West 117th Street driveway will be designed so as to direct Project-related traffic to and from Aviation Boulevard (i.e., limit Project traffic from travelling on nearby local residential streets). The West 117th Street Project driveway will accommodate left-turn ingress and right-turn egress movements only. As such, southbound left-turn movements out of the Project driveway onto eastbound West 117th Street and westbound right-turns into the driveway from West 117th Street are prohibited. Thus, trips associated with the Project are not anticipated to utilize West 117th Street east of the Project driveway.

Furthermore, the Map A figure provided with the comment letter provides an unrealistic forecast of Project-related trips traveling to the site from southbound I-405 Freeway. The route on Map A assumes southbound I-405 traffic would exit the freeway and travel south on La Cienega Boulevard, west on 120th Street, north on Judah Avenue and west on West 117th Street. The more direct route evaluated in the traffic study and Draft EIR (see Exhibit 5.1-7) assumes Project traffic exiting southbound I-405 Freeway and travelling west on Imperial Highway and south on Aviation Boulevard to reach the site; a route that is approximately one mile less in length as compared to the route shown on Map A.

However, in response to community concerns regarding potential Project-related trips using Judah Avenue to access the Project site, additional optional Project features have been proposed. These optional features are included in Section 2.0, Errata of this document and thereby incorporated into the new Section 2.8 Optional Traffic Calming Measures and into Section 5.1, Traffic/Access of the Draft EIR.

These optional measures are not required to mitigate potential Project-related traffic impacts. As discussed in Section 5.1, Traffic/Access of this Draft EIR, all Project-related traffic impacts would be reduced to a level less than significant with implementation of Mitigation Measures (MM) 5.1-1 through MM 5.1-6, MM 3.2-6, and MM 3.4-3. Therefore, these optional Project features are included within this Draft EIR to allow for the possibility of future implementation, if determined to be warranted/beneficial by the County.

Option 1 involves the elimination of ingress into the Project's West 117th Street driveway. Access into the West 117th Street driveway would be limited to right-turn egress movements only and no vehicular entry (left-turn or right-turn) would be permitted. All of the Project's ingress traffic would be required to use the main driveway on Aviation Boulevard.

Option 2 would restrict traffic movements from entering westbound onto West 117th Street from Judah Avenue through construction of a curb extension at the northwest corner of the Judah/ West 117th intersection. Also, eastbound traffic on West 117th Street would be limited to right-turns only at the Judah intersection. This Option is depicted in the new Exhibit 2-17, located in Section 2.2 of this document.

Option 3 is the potential installation of a landscaped median island on the "wide" segment of Judah Avenue between West 118th Street and West 120th Street. Conceptually, the roadway configuration would be modified from the current two through travel lanes in each direction on Judah Avenue to one travel lane in each direction, plus a center landscaped median. Left-turn pockets can be provided at intersections. Curbside parking can also be retained on both sides of Judah Avenue with the center landscaped median. This Option is depicted in the new Exhibit 2-18, located in Section 2.2 of this document. This additional information amplifies and clarifies information provided in the Draft EIR and does not cause any new significant impacts.

Response DANA-3

Pages 7 through 12 of Appendix H of the Draft EIR provide a full summary of the traffic access and circulation associated with the Project. As stated in page 5.1-13 of the Draft EIR (page 7 of Appendix H), vehicular access to the Project site is planned to be provided via driveways on Aviation Boulevard and West 117th Street. The existing West 116th Street signalized project driveway will be modified to serve as the main Project driveway for access to the retail and residential components and associated parking areas. The existing traffic signal equipment at the Aviation Boulevard/West 116th Street intersection will be modified accordingly.

The West 116th Street Project driveway will provide full access (i.e., left-turn and right-turn ingress and egress turning movements). For exiting traffic, two lanes will be provided: one for left-turns and one for right-turns. The West 117th Street Project driveway will be located on the north side of West 117th Street (i.e., along the southerly property frontage) at the southwest corner of the project site. The West 117th Street project driveway will provide access to the retail and residential components of the proposed project and associated parking areas. The West 117th Street driveway will be designed so as to direct Project-related traffic to and from Aviation Boulevard (i.e., limit project traffic from travelling on nearby local residential streets).

As such, the West 117th Street Project driveway will accommodate left-turn ingress and right-turn egress movements only (i.e., southbound left-turn and westbound right-turn movements are prohibited). Therefore, trips associated with the Project are not anticipated to utilize West 117th Street east of the Project driveway. Please refer to Response DANA-2.

Response DANA-4

Section 7.3, beginning on page 7-2 of the Draft EIR, provides a discussion of the alternatives considered to the proposed Project. As stated in page 7-4 of the Draft EIR, while not specifically required by Los Angeles County Traffic and Lighting and Land Development Division staff, a review was conducted of the potential full street closure of West 117th Street at Aviation Boulevard as a Project alternative, and as documented in the Full-Street Closure Review memorandum prepared by Linscott, Law & Greenspan, Engineers, in August 2010. The full street closure would involve vacating a portion of West 117th Street and constructing a private Project driveway along Aviation Boulevard. The full street closure would involve the installation of a standard residential cul-de-sac on West 117th Street east of the Project driveway. A full street closure would eliminate all vehicle traffic that would otherwise use the segment (except for traffic associated with residences that front the street).

As described in Section 7.3 of the Draft EIR, the potential full-street closure of West 117th Street at Aviation Boulevard would not meet the requirements outlined in the *2010 California Vehicle Code* for closure of the roadway. There is no pattern of a serious crime problem in this neighborhood. In addition, based on a review of the traffic count data for the Aviation Boulevard/West 117th Street intersection, it is determined that there is currently very limited regional or “cut-through” traffic on West 117th Street, as the roadway is currently carrying less traffic (i.e., 23 vehicles during the AM peak hour, 31 vehicles during the PM peak hour, and 388 daily traffic volumes) than what would otherwise be expected based on the number of homes that take access to the street.

The West 117th Street Project driveway is designed so as to direct Project-related traffic to and from Aviation Boulevard (i.e., limit Project traffic from travelling on nearby local residential streets). The installation of roadway striping and signage at the Project driveway would prohibit southbound left-turn movements from the Project driveway onto eastbound West 117th Street. The installation of signage on westbound West 117th Street at the Project driveway would prohibit westbound right-turns into the Project driveway from West 117th Street. As such, trips associated with the Project are not anticipated to utilize West 117th Street east of the Project driveway and would therefore not increase the number of vehicles on West 117th Street and Judah Avenue. Instead, the full-street closure of West 117th Street at Aviation Boulevard would cause a shift and increase in traffic to other existing local residential streets such as 118th Street and Judah Avenue. Residents who currently utilize the closed street for access to and from their residences would need to use other local residential streets to access Aviation Boulevard since direct access to Aviation Boulevard from West 117th Street is eliminated.

In addition, while full street closure of West 117th Street may address potential cut-through traffic on the roadway, the number of turning maneuvers or U-turns on local streets will increase, which subsequently potentially increase the number of accidents in the area as motorists try to familiarize themselves with the new access options. More importantly, full street closures would impede access to the immediate and surrounding neighborhoods by police, fire, ambulance and other emergency vehicles. Thus, the full street closure of West 117th Street at Aviation Boulevard Project alternative was determined not feasible and was eliminated from further consideration.

However, as discussed above in Response DANA-2, in response to community concerns regarding potential Project-related trips using Judah Avenue to access the Project site, additional optional Project features have been proposed. These optional features are included in Section 2.0, Errata of this document and thereby incorporated into the new Section 2.8 Optional Traffic Calming Measures and into Section 5.1, Traffic/Access of the Draft EIR.

These optional measures are not required to mitigate potential Project-related traffic impacts. As discussed in Section 5.1, Traffic/Access of this Draft EIR, all Project-related traffic impacts would be reduced to a level less than significant with implementation of Mitigation Measures (MM) 5.1-1 through MM 5.1-6, MM 3.2-6, and MM 3.4-3. Therefore, these optional Project features are included within this Draft EIR to allow for the possibility of future implementation, if determined to be warranted/beneficial by the County.

Option 1 involves the elimination of ingress into the Project's West 117th Street driveway. Access into the West 117th Street driveway would be limited to right-turn egress movements only and no vehicular entry (left-turn or right-turn) would be permitted. All of the Project's ingress traffic would be required to use the main driveway on Aviation Boulevard.

Option 2 would restrict traffic movements from entering westbound onto West 117th Street from Judah Avenue through construction of a curb extension at the northwest corner of the Judah/ West 117th intersection. Also, eastbound traffic on West 117th Street would be limited to right-turns only at the Judah intersection. This Option is depicted in the new Exhibit 2-17, located in Section 2.2 of this document.

Option 3 is the potential installation of a landscaped median island on the "wide" segment of Judah Avenue between West 118th Street and West 120th Street. Conceptually, the roadway configuration would be modified from the current two through travel lanes in each direction on Judah Avenue to one travel lane in each direction, plus a center landscaped median. Left-turn pockets can be provided at intersections. Curbside parking can also be retained on both sides of Judah Avenue with the center landscaped median. This Option is depicted in the new Exhibit 2-18, located in Section 2.2 of this document. This additional information amplifies and clarifies information provided in the Draft EIR and does not cause any new significant impacts.

Response DANA-5

Please refer to Response DANA-3 and Response DANA-4. The trip distribution percentages for the study intersections associated with the Project are provided in Exhibit 5.1-7 in the Draft EIR and on page 34 of Appendix H of the Draft EIR. The AM and PM Project-only traffic volumes are shown in Figures 5.1-8 and 5.1-9 of the Draft EIR (Figures 6-5 and 6-6 on pages 35 and 36 of Appendix H of the Draft EIR), respectively. The forecast net new AM and PM Project traffic volumes are shown in Figures 6-7 and 6-8 on pages 37 and 38 of the Appendix of the Draft EIR, respectively.

Overall, the traffic analysis assumes only 5 percent of Project-related inbound traffic approaching the site from westbound 120th Street. This equates to 2 inbound vehicle trips during both the AM and PM peak hours (see Figures 6-7 and 6-8 on pages 37 and 38 of Appendix H of the Draft EIR). While it is expected that these vehicles will use Aviation Boulevard to travel north to the site, the unlikely addition of one or two additional vehicles on Judah Avenue would not be considered a significant traffic impact.

The West 117th Street Project driveway is designed so as to direct Project-related traffic to and from Aviation Boulevard (i.e., limit Project traffic from travelling on nearby local residential streets). The installation of signage on westbound West 117th Street at the Project driveway would prohibit westbound right-turns into the Project driveway from West 117th Street. The installation of roadway striping and signage at the Project driveway would prohibit southbound left-turn movements from the Project driveway onto eastbound West 117th Street. Thus, trips associated with the Project are not anticipated to utilize West 117th Street east of the Project driveway and would therefore not increase the number of vehicles on West 117th Street and Judah Avenue.

Response DANA-6

Please see Response DANA-4.

Response DANA-7

Please see Response Parsons-2. Of the 797 total parking spaces provided, 679 spaces will be allocated for the residential component and 118 parking spaces will be allocated for the commercial component. Parking for the Project will be provided within a two level parking garage (one subterranean and one surface parking level), with residential parking provided on both parking levels and the commercial parking provided solely on the surface parking level.

The proposed residential parking is consistent with the parking requirements specified for apartments in non-mixed-use and non-transit-oriented residential projects in the County Zoning Ordinance, with one exception. Where the general vehicle parking space regulations require 1.75 parking spaces for every one-bedroom unit, the Project would provide 1.25 parking spaces. The proposed residential parking is consistent with the parking requirements specified for condominiums in non-mixed-use and non-transit-oriented residential projects in the County Zoning Ordinance, with two exceptions. Where the general vehicle parking space regulations require 2.25 parking spaces for studio and one-bedroom condominium units, the project will provide 1.25 parking spaces. Two- and three bedroom units would be provided with 2.25 parking spaces, consistent with the County Zoning Ordinance for both apartments and condominiums.

As referenced in page 5.1-26 of the Draft EIR, the Project is a transit-oriented development (TOD) in which according to recent research efforts have demonstrated that vehicular trip generation is substantially reduced at TOD sites as compared to what would otherwise be forecast through use of the Institute of Transportation Engineers' (ITE) trip generation rates (derived from studies of generally suburban and stand-alone development projects). Consequently, since ITE trip generation and parking generation rates are the standards from which local traffic and parking rates are typically derived from, it can be concluded that parking demand ratios are substantially reduced at residential TODs by the same order of magnitude as vehicle trip generation since they are also based on ITE data. Specifically, recent research indicates that parking supply for residential uses can be reduced by 50 percent at TOD sites since residents at TOD sites typically own fewer private vehicles due to smaller households, as well as the availability of alternative transportation (e.g., public transit, walking, etc.). The Project proposes a 19.75 percent parking reduction from the County non-TOD requirements for residential projects, well below the 50 percent parking supply reduction observed at other residential projects. Thus, sufficient parking is provided on-site and on-street parking by residents is not anticipated to occur.

In the unlikely event that residents of the Project park on the neighboring residential streets, MM 5.1-4 requires that the Project Applicant must coordinate with the Los Angeles County Department of Public Works regarding a possible restricted parking program for West 117th Street and Judah Avenue adjacent to the Project site, which currently have unrestricted parking. Whether or not restricted parking is implemented and the type of restriction used (e.g., meters, permits, signs) shall be determined to the mutual satisfaction of the Project Applicant, the County, and the adjacent residents.

Response DANA-8

As discussed on page 5.4-3 of the Draft EIR, the LACSD has indicated that implementation of the Project would increase demand for LACSD services, which would result in the need for additional law enforcement resources for the general area of service (see Appendix J of the Draft EIR). However, the LACSD concluded that implementation of the Project would not significantly impact acceptable service ratios or response times (i.e. routine response time within 60 minutes; priority response time within 20 minutes.) Increased need for sheriff's deputies and other LACSD resources from urban development and associated population growth, such as the Project, is financed by County resident tax revenue; by fees for LACSD permits, penalties, services; and through the County of Los Angeles annual budget process. As stated in the LACSD response letter in Appendix J, the Project would not create the need for expanded facilities or new facilities, and existing facilities are adequate to serve the Project. The analysis in the Draft EIR has been confirmed as accurate by the LASD (see Response LASD-1).

Response DANA-9

Pages 2-10 and 2-11 in the Draft EIR provide a description of parking and circulation for the Project. The vehicular and pedestrian circulation plans associated with the Project are provided in Exhibit 2-7 in the Draft EIR. As described in the Draft EIR, residents and pedestrians could enter/exit the Project site via the West 116th Street/Aviation Boulevard intersection driveway and/or the West 117th Street driveway. Residents could enter/exit the Project site via pedestrian corridors between Buildings 2A and 2B, between Buildings 2B and 1B, or from two internal resident/guest lobbies located in Building 1B.

The gated ingress/egress to the Fire Lane occurs from Aviation Boulevard and from the intersection of Judah Avenue and West 116th Street and would prohibit non-emergency vehicle access and the Draft EIR states that this location may prohibit pedestrian access. However, the pedestrian access point on West 116th Street at Judah Avenue currently exists and it is the recommendation of County staff that it should remain open for direct access by the community to the Metro Green Line station. The nature of a TOD project is to encourage pedestrian access to transit facilities. If the referenced pedestrian access were removed, the route for community members would be to go south on Judah Avenue, west on West 117th Street and north on Aviation Boulevard (i.e., circle around the block) to the main driveway for access to the Metro Green Line station. Instead of a walking distance of approximately 250 feet, the new walking distance to the main driveway on Aviation Boulevard is approximately 1,320 feet. Thus, the existing community members who currently utilize the pedestrian access on West 116th Street at Judah Avenue from their residences would be highly inconvenienced. As stated in MM 5.1-4 of the Draft EIR, the Project Applicant must coordinate with the County Department of Public Works regarding a potential restricted parking program for West 117th Street and Judah Avenue adjacent to the Project site. This MM would address any concerns by the community regarding the issue of overflow parking from the Caltrans Park-and-Ride Lot.

Response DANA-10

Please see Response DANA-4, Response DANA-7, and DANA-9. At the Planning Commission Meeting held on Wednesday, February 16, 2011, the Project Applicant was directed to hold an additional neighborhood meeting to discuss the issues presented in the DANA letter and at the Planning Commission meeting. This neighborhood meeting was held at the Del Aire Park Gymnasium on Saturday, March 26, 2011.

Response DANA-11

This comment includes four graphics as attachments in support of the DANA comment letter. No response is required. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.



Cox, Castle & Nicholson LLP
2049 Century Park East, 28th Floor
Los Angeles, California 90067-3284
P 310.277.4222 F 310.277.7889

Charles J. Moore
310.284.2286
cmoore@coxcastle.com

File No. 56290

February 10, 2011

BY HAND DELIVERY

Regional Planning Commission
County of Los Angeles
320 West Temple Street
Los Angeles, California 90012

Re: **Transit-Oriented Development at the Metro Green Line Aviation Station;
Regional Planning Commission Hearing Date: February 16, 2011**

Dear Commissioners:

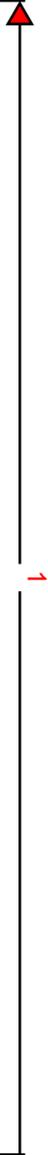
The Aviation Station project is an exciting proposal that will construct at last a transit-oriented development (TOD) within the unincorporated County of Los Angeles.

The project site comprises private and public land at the Metro Green Line Aviation Station, located in the Del Aire community at the intersection of Aviation Boulevard and Imperial Highway near the Los Angeles International Airport (LAX). Seeking to increase ridership on the Green Line, the Los Angeles Metropolitan Transportation Authority (Metro) approached the Kroeze family, the owner of private property and a local business adjacent to the Metro Green Line Aviation Station. Metro proposed a joint development to improve the appearance and experience of the station for transit users and to provide opportunities for new riders with high-density housing located adjacent to transit.

Promoting TOD in Los Angeles is an important goal for most of the region's planning agencies; however, TOD is often stymied by the need for parcel assembly. Parcel shallowness resulting from historical strip commercial zoning makes infeasible retail development and high-density housing necessary for a successful TOD project. This project is possible only because the Kroeze family assembled a city block over the course of 50 years by gradually purchasing the homes surrounding their family business. In 1995, the Metro Green Line opened and the property became ideally located adjacent to a major light rail station. This large assemblage of private property adjacent to transit offers an opportunity very unique in Los Angeles County to redevelop underutilized urban property with a successful, modern TOD project.

TOD projects such as Aviation Station hold the potential to meet many objectives the County is committed to, including increasing the stock of mixed-use infill and workforce housing, mobility, community health and livability, economic development and greenhouse gas emission reductions. Aviation Station is expected to be a revitalizing catalyst project that will spur redevelopment of the Aviation Boulevard corridor.

CCN



The design and concept for the Aviation Station project has involved the close cooperation and review of many State and local agencies, County departments, and services providers, including Caltrans, Metro, LAX, the Los Angeles County Local Agency Formation Commission, the Cities of El Segundo, Los Angeles, and Hawthorne, the County Sheriff, Fire, and Public Works Departments, Golden State Water Company, and the Wiseburn School District.

Aviation Station and the Changing Del Aire Community

Aviation Station is located in the unincorporated community of Del Aire—an urban, largely post-World War II neighborhood located near LAX, the Pacific Concourse Industrial Park, the Airport Courthouse, and aviation-related industry located along Aviation Boulevard. Existing infrastructure already serves the property and will be upgraded to assure efficient delivery of water, sewers, and other services.

The area has seen substantial infill development and densification in recent years. Within Del Aire, the Pacific Concourse project approved by the County Board of Supervisors in 2005 was built near the project site at a density of 88 units per acre. Several other high-density housing developments have been approved or constructed in the same area, *e.g.*, Threesixty at The South Bay on El Segundo Boulevard, Fusion at South Bay near Aviation Boulevard and Marine Avenue, and Central Park near the corner of 120th Street and Van Ness Avenue.

Aviation Station is an important stop along the Metro Green Line, and it is the only light rail station providing access to LAX via free shuttle. Aviation Station is planned as a link for the proposed Crenshaw/LAX Transit Corridor Line, a first-phase transit project funded by Measure R. In addition to light rail, Aviation Station is a busy regional bus terminal used by Metro, Santa Monica's Big Blue Bus, Culver CityBus, the Torrance Transit/Municipal Area Express, and the shuttle system to LAX operated by Los Angeles World Airports. Aviation Station connects Del Aire and the surrounding communities to major job centers and regional destinations, and is itself situated proximate to LAX and other significant employment centers.

The private property portion of the project is located adjacent to Aviation Station and is improved currently with the Wild Goose restaurant and bar, an 8-room motel, surface parking, and low-density residential homes developed between the 1930s and 1950s.

The Project Will Redevelop Underutilized Urban Property as Part of a Modern Multimodal TOD Development

The project will be developed jointly by Metro and the Kroeze family. The existing Wild Goose restaurant and bar, motel, low-density housing and existing, inefficient bus facilities and surface parking will be demolished. The project will redevelop the private and public land with 29,500 square feet of retail, 390 multi-family residential units, and a new pedestrian-friendly transit plaza to connect the neighborhood to the station. The project will also construct a new, modernized bus terminal in a more appropriate location adjacent to Aviation Boulevard, directly to the north of the project site, and will reconfigure parking at the existing Park and Ride lot.

The project is designed to establish transit and pedestrian-supportive development, improve public safety and pedestrian access to transit facilities, create new economic and housing

opportunities, and reduce congestion and greenhouse emissions by decreasing vehicle miles traveled and inviting pedestrian access. For development to be transit-oriented, it needs to be more than just adjacent to transit. Development generally needs to be shaped by transit in terms of parking, density, and building orientation in comparison to conventional development for it to be considered transit-oriented. A successful TOD will reinforce both the community and the transit system. Accordingly, the proposed development relates to the station along at its northern elevation, relates to the busy Aviation Boulevard corridor at its western elevation, and steps down to two-story townhomes at the two elevations interfacing with the residential Del Aire neighborhood.

One of the challenges facing Aviation Station is that the platform is elevated, isolated, and does not connect visually to its surroundings. The elevated station platform poses difficulties for access, safety, and creating a sense of neighborhood character. To maximize the potential and place-making qualities of the station, the project design integrates the station with the community, connecting it to the neighboring residences and industrial employment centers and creating usable, pedestrian friendly space and character. The proposed retail uses will be connected visually to the station and will benefit both the community and transit users. In addition, the free airport shuttle will provide opportunities for airport users to use Aviation Station as an extension of the terminal and will provide essential services lacking at the airport. Vehicular traffic and the improved bus terminal will also provide important opportunities for intermodal connectivity.

To increase ridership potential, Metro requires services for transit-users, increased accessibility to the station, and an aesthetically appealing environment to draw people to the station. The project is designed to capture vehicular traffic, to improve the pedestrian experience, and to create a pleasant and safe environment that will encourage people to use the station and transit. Landscaping, architecture and signage will provide a sense of place and community identity.

Aviation Station Implements Important Policies the County Has Promoted for Many Years

From the adoption of the Transit Oriented Districts Ordinance, the Mixed-Use Ordinance, and important policies within the adopted Housing Element to the proposed East LA 3rd Street Specific Plan and Healthy Design Ordinance, the County has consistently attempted to establish TOD as an important component of the overall development pattern to manage the planned growth of the region. The County's efforts have only intensified since California passed significant legislation to reduce greenhouse gas emissions and to promote land use growth patterns that will reduce driving and vehicle miles traveled, *i.e.*, AB 32 and SB 375.

Current County Zoning Regulations Do Not Foster TOD Development

Despite diligent efforts at advanced planning, development within County transit-oriented districts has languished for a decade and current zoning regulations are still not appropriate for modern, urban infill, TOD projects. For example, Aviation Station is a prominent station and an important intermodal transit hub for LAX, yet it is not included within a transit-oriented district. In addition, current parking requirements do not allow the flexibility necessary for transit-oriented projects and current density limitations do not acknowledge the urgent need for high-density development near public transit stations.

**The Mixed Use Development Zone Provides the Flexibility Necessary
to Build a Successful TOD Project**

The underutilized Mixed Use Development zone is the best available mechanism to allow for the development of the project, without the need for variances from the zoning regulations, ahead of any County plans to modernize the zoning regulations. Planning staff selected the Mixed Use Development zone specifically because it provides the flexibility necessary for the ultimate builder or builders to construct the project, but still requires the Planning Director to approve any design changes to assure quality development through the conditional use permit.

However, planning staff proposes to apply also the Development Program combining zone to the property. The Development Program combining zone requires the project to conform to specified plans and exhibits and eliminates the flexibility provided by the Mixed Use Development zone. With the Development Program combining zone, changes in project design require Commission approval of a new conditional use permit and tentative map. However, a builder should be able to accomplish design changes without the need for a new conditional use permit.

In essence, the Mixed Use Development zone properly provides design flexibility by authorizing the Planning Director to approve subsequent, revised site plans, but the Development Program combining zone inappropriately requires the Commission to review a new conditional use permit for the same design changes. The Development Program combining zone is incompatible with the Mixed Use Development zone and should be eliminated.

TOD is Critical For Achieving the State's and the County's Emissions Reduction Targets

Household transportation is the single-largest and fastest-growing source of global warming pollution in the state. Locating housing closer to jobs and transportation choices and creating walkable communities reduces commute times and can cut millions of tons of global warming pollution, while improving quality of life. California households could reduce their transportation-related climate pollution by 30% or more from reduced fuel use alone if development patterns between now and 2020, both inside and outside of the urban core, were more efficient. (A Guide to California's SB 375, Natural Resources Defense Council, June 2009)

If most of California's growth continues to follow typical sprawl development patterns, the result will be higher costs of local services, continued loss of farmland and open space, and increased dependence on automobiles. Consequently, the total number of annual vehicle miles traveled in California is expected to increase from 296 billion miles in 2000 to 400 billion miles by 2020, a 33% increase. (Statewide Transit-Oriented Development Study: Factors for Success in California, CalTrans, 2002) Even with much greater fuel efficiency and low-carbon fuels, California will not be able to achieve its climate goals unless it can reduce the rate of growth in vehicle miles traveled. (A Guide to California's SB 375, Natural Resources Defense Council, June 2009).

TOD Benefits Individuals, Communities, Regions and the State

Nearly a decade ago, Caltrans conducted a study on the factors for successful TOD in California, and cited numerous benefits of TOD (Statewide Transit-Oriented Development Study: Factors for Success in California, CalTrans, 2002):

- **TOD provides mobility choices.** By creating activity nodes linked by transit, TOD provides important mobility options that are very much needed in congested metropolitan areas. This also allows young people, the elderly, people who prefer not to drive, and those who do not own cars the ability to get around.
- **TOD increases public safety.** By creating active places that are busy through the day and evening, and providing “eyes on the street,” TOD helps increase safety for pedestrians, transit-users, residents, and businesses.
- **TOD increases transit ridership.** TOD improves the efficiency and effectiveness of transit service investments by increasing the use of transit by 20% to 40%.
- **TOD reduces rates of vehicle miles traveled.** Vehicle travel in California has increased faster than the state’s population for years. TOD can lower annual household rates of driving by 20% to 40% for those living, working, and shopping near transit stations.
- **TOD increases households’ disposable income.** Housing and transportation are the first and second largest household expenses, respectively. TOD can free-up disposable income by reducing driving costs, saving an estimated \$3,000 to \$4,000 per year for each household.
- **TOD reduces air pollution and energy consumption rates.** By providing safe and easy pedestrian access to transit, TOD lowers rates of air pollution and energy consumption. Also, TODs reduce rates of greenhouse gas emissions by 2.5 to 3.7 tons per year for each household.
- **TOD conserves resource lands and open space.** Because TOD consumes less land than low-density, auto-oriented growth, it reduces the need to convert farmland and open spaces to development.
- **TOD promotes economic development.** TOD is increasingly used as a tool to help revitalize declining urban neighborhoods and to enhance tax revenues for local jurisdictions.
- **TOD decreases infrastructure costs.** Depending on local circumstances, TOD can help reduce overall infrastructure costs for expanding water, sewage, and roads to local governments by up to 25% through more compact and infill development.
- **TOD promotes affordable and work-force housing.** TOD increases the stock of lower-cost housing and reduces household transportation expenditures, thereby increasing disposable income available to cover housing costs. Housing costs for land and structures can be significantly reduced through more compact growth patterns.

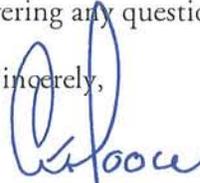
The Current Market Favors TOD and Multi-Family Infill Housing

Several broad demographic trends influencing California's future are expected to contribute favorably to the market demand for TODs. For housing, these trends not only include unprecedented population and household growth, but a shortfall in housing production and a significant need for housing that is affordable to many households in California. Former homeowners who lost their properties to foreclosure are now pouring into the rental market. Meanwhile, tightened credit standards are making it tougher for potential buyers to qualify for a home loan, despite very low interest rates. Compounding the demand for rental housing, Gen-Yers are less interested in home ownership and are unwilling to sign up for the long commutes that their parents lived with.

Los Angeles County is expected to be a renters' market for some time to come, and this project fulfills an important need for multi-family, workforce housing located adjacent to transit and near major employment centers.

We appreciate greatly the diligent work of planning staff and the other County departments and agencies to help form this important TOD project. The project team looks forward to presenting the project to the Commission and answering any questions that you may have.

Sincerely,



Charles J. Moore

56290\4057389v1

cc: Roger Moliere, Metro
Richard Bruckner
Sorin Alexanian
Sam Dea
Carolina Blengini
Patricia Keane
Steve Burger
Janna Masi

**Written Responses to:
Cox, Castle & Nicholson, LLP (CCN)**

Response CCN-1

This comment expresses support for the Project, but does not raise 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. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

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February 24, 2011

Ms. Christina Tran
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Subject: Aviation Station Project – County Project No. TR070853-(2)
Parking Permit No. RPKPT201000008

PARSONS

Dear Ms. Tran:

I am one of the many commuters who park at the Aviation Station Metro Park and Ride and take the bus to work in downtown Los Angeles. I am concerned that the proposed Aviation Station Project will adversely affect the public's ability to park at the Park and Ride to utilize the public transportation services available at the Aviation Green Line Station. If commuters that currently use the Aviation Station Park and Ride cannot find a place to park and end up driving to work rather than taking the public transportation, this will increase rather than decrease transportation emissions. To avoid this unintended consequence, the County should require the developer to meet or exceed the standard parking requirements for the project, and impose restrictions to prevent residents and patrons of the new Aviation Station Project from parking their cars in the adjacent Park and Ride lot.

On week days, the Aviation Station Park and Ride lot fills up by 8:10 in the morning, and commuter parking often overflows onto the streets of the Del Aire residential neighborhood. The demand for parking at the Park and Ride already exceeds the available number of spaces. If the proposed Aviation Station Project does not have adequate parking, this will create more competition for the already too few parking spaces at the Aviation Station Park and Ride.

According to the staff analysis of the project, the proposed project would replace 11 existing residences, a commercial structure (bar), motel and surface parking lot with 390 residential units on 5.78 acres (67.47 dwelling units per acre) along with 29,500 square feet of commercial/retail space, but provide only 797 parking spaces for the residential and commercial uses combined. This is a 17% reduction in parking spaces relative to what would normally be required under Part 11 of Chapter 22.52 of the County Code, which amounts to 167 fewer parking spaces.

By not providing sufficient parking, this project has the potential to increase rather than decrease regional transportation emissions if commuters that currently use the Park and Ride can no longer do so because the residents and guests of the Aviation Station Project are parking in the Park and Ride lot. Does the Draft Environmental Impact Report consider the potential increase in greenhouse gas and other emissions if commuters cannot find a place to park at the Park and Ride and have to drive their car to work rather than take the bus or train?

Section 12 (Parking Permit) of the staff analysis lists five items that must be satisfied in order to justify the requested parking permit. In my opinion, the project as currently proposed does not satisfy the following requirements:

- A. That there will be no need for the number of parking spaces required by Part 11 of Chapter 22.52.
- D. That the requested parking permit at the location proposed will not result in traffic congestion, excessive off-site parking, or unauthorized use of parking facilities developed to serve surrounding property.



In Attachment L, "Burden of Proof for Requested Parking Permit" it states:

I. There will be no need for the number of parking spaces required by Part 11 of Chapter 22.52 because:

"The proposed project will develop a two-level parking garage and additional surface parking areas located adjacent to the new buildings. In addition, public parking will be provided off-site in the adjacent, reconfigured Park and Ride lot."

The developer should not use the Park and Ride lot to justify their request to provide fewer parking spaces for the project than required by the code. The existing parking spaces at the Park and Ride are already fully utilized by commuters; therefore the Park and Ride should not be allowed to be used as overflow parking for the Aviation Station Project. The Park and Ride was created to facilitate use of the public transportation services by people who are not within walking distance of the station – use of the Park and Ride parking spaces by the Aviation Station Project residents and visitors would constitute "unauthorized use of parking facilities developed to serve surrounding property."

Furthermore, page 3 of Attachment L states "The proposed project is a TOD, developing residential and commercial land uses adjacent to a light rail station and major bus terminal. Therefore, it is expected that fewer project residents would own cars than residents of non-TOD projects. The project proposes 20 percent fewer residential parking spaces than conventional requirements...". It appears this assumption is based on a study of households in Vancouver, Canada, which is not at all comparable to Los Angeles. Almost every family in Los Angeles owns at least one car. It is absurd to assume that Los Angeles residents would not own a car and to use that assumption to justify providing fewer parking spaces than required by the code.

I sincerely hope that the Los Angeles County Department of Regional Planning and Regional Planning Commission require the developer to meet or exceed the standard parking requirements required by Part 11 of Chapter 22.52 of the County Code. In addition, please ensure that the proposed project will not adversely impact commuters who currently use the Aviation Station Park and Ride – the existing demand already exceeds the number of available parking spaces. Please consider the needs of the commuting public in your decisions regarding this proposed project and its impacts on surrounding uses external to the development.

Thank you for your consideration of these comments.

Sincerely,

Cindy Parsons
Cindy Parsons
5428 W. 140th Street
Hawthorne, CA 90250

**Written Responses to:
Cindy Parsons, Hawthorne, CA (Parsons)**

Response Parsons-1

The Caltrans Park-and-Ride Lot is an existing surface lot providing free parking for transit users. The Park-and-Ride Lot is owned by Caltrans and its operation is subject to an operations and maintenance agreement with Metro requiring the provision of 400 parking spaces for transit users. There is no requirement that free public parking be provided at Metro transit stations, and many Metro transit stations provide no parking.

The Project will reconfigure the Park-and-Ride Lot to accommodate the relocation of the Metro Green Line Station bus terminal. As stated on page 2-18 of the Draft EIR, the reconfigured Park-and-Ride Lot will provide 400 parking spaces for transit users, consistent with the current agreement between Metro and Caltrans. Project residents and customers of Project who are not transit users will not be authorized to park in the Park-and-Ride Lot, and such unauthorized parking may be subject to citation, fine, immobilization, towing, and/or impoundment.

CEQA requires an analysis of whether the Project will result in parking problems with a subsequent impact on traffic conditions. The parking analysis prepared for the Project and analyzed on page 5.1-26 of the Draft EIR demonstrates that proposed parking program is appropriate and sufficient for the Project, which is a mixed-use TOD, and that the Project will not result in parking problems at the Park-and-Ride Lot and surrounding properties with a subsequent impact on traffic conditions. Please also see Response DANA-7.

Because the Project will not result in parking problems with a subsequent impact on traffic conditions and the Project is designed as a TOD to increase transit ridership, the Project is not expected to result in increased transportation emissions.

Response Parsons-2

As stated in Response Parsons-1, Project residents and customers of the new retail uses who are not also transit users will not be authorized to park in the Park-and-Ride Lot, and such unauthorized parking may be subject to citation, fine, immobilization, towing, and/or impoundment. The Project is a mixed-use TOD and proposes parking in an amount adequate to support the demand for parking created by the Project, as discussed in Response DANA-7.

The parking code requirements for the Project were determined in accordance with Section 22.40.520.B.9.a of the Los Angeles County Code for the MXD zone. The County Code does not provide parking rates specifically for mixed-use TOD such as the proposed Project. However, the County Code provides the authority to the Regional Planning Commission to require parking for the development in an amount adequate to prevent traffic congestion and excessive on-street parking, but no less than the following requirements:

- Residential: 1.0 space per dwelling unit
- Commercial: 50 percent of 1.0 space per 250 square feet (SF)

As such, the County Code sets forth the following potential minimum parking requirements as applied to the Project:

- Residential (390 units): 1.0 space per dwelling units = 390 spaces
- Commercial (29,500 SF): 50 percent x 1.0 space per 250 SF = 59 spaces
- Total MXD Zone Potential Minimum Parking Code Requirement = 449 spaces

For comparison, a review was also conducted of the potential parking requirements for each component of the Project for non-mixed-use development (non-MXD) in accordance with Section 22.52 of the County Code. Based on the County Code for non-MXD zones, a total of 846 parking spaces would be required.

The Project provides a total of 797 parking spaces, of which 679 spaces are allocated for the residential component and 118 spaces are allocated for the commercial component of the Project. As noted above, the Project qualifies for consideration under the County Code MXD zone to provide substantially fewer parking spaces (i.e., 449 spaces in lieu of the 797 spaces to be provided).

While the County Code and the extensive literature related to parking demand at TODs would support a relatively lower parking supply for the Project, the Project Applicant proposes to provide additional parking so as to ensure that parking demand will be satisfied on-site, thereby eliminating the need for residents, patrons, and employees associated with the Project to seek alternative street parking or unauthorized parking within the Park-and-Ride Lot. Further, the ample on-site parking supply ensures that there will be no potential traffic congestion that might otherwise occur due to an inadequate supply of parking on-site.

The specific approach with respect to the Project's proposed parking is as follows:

Commercial Parking. The County Code parking rate for commercial land uses is 1 space/250 square feet (or 118 spaces) while the minimum MXD Zone parking rate is 1 space/500 square feet (or 59 spaces). The project proposes to provide parking for the commercial component that is equivalent to the County Code (118 spaces), thereby substantially exceeding the minimum MXD Zone requirement.

Residential - Studio and One-Bedroom. The County Code parking rates for studio and one-bedroom residential units are 1.75 spaces/unit for studio and one-bedroom apartments and 2.25 spaces/unit for studio and one-bedroom condominiums (or 416 spaces for the project's studio and one-bedroom residential components). By comparison, the comparable minimum MXD parking rate is 1 space/unit for studio and one-bedroom apartment and condominium units (or 199 spaces for the project). The project proposes to provide parking for the studio and one-bedroom units at a rate of 1.25 spaces/unit (or 249 total spaces), which is less than the standard County Code requirement for non-MXD projects but exceeds the minimum MXD Zone requirement.

Residential - Two/Three Bedroom. The County Code parking rate for two- and three-bedroom residential units (apartment and condominiums) is 2.25 spaces/unit (or 430 spaces for the project's two- and three-bedroom residential components). By comparison, the comparable minimum MXD Zone parking rate is 1 space/unit for both two-bedroom and three-bedroom units (or 192 spaces for the project). The project proposes to provide parking for the two- and three-bedroom component that is equivalent to the County Code for non-MXD projects, thereby substantially exceeding the minimum MXD Zone requirement.

Two recent research efforts have been conducted for purposes of evaluating the trip generation characteristics at development sites in urban areas in close proximity to transit stations and transit hubs:

- Transit Cooperative Research Program Report 128 - Effects of TOD on Housing, Parking, and Travel published by the Transportation Research Board in 2008 (the TRB report), and
- Trip-Generation rates for Urban Infill Land Uses in California prepared for Caltrans by the Association of Bay Area Governments in April 2008 (the Caltrans report)

The TRB report evaluated trip generation at 17 TODs in four urbanized areas of the country: Philadelphia/Northeast New Jersey; Portland Oregon; metropolitan Washington D.C.; and the San Francisco East Bay area. The 17 TOD sites studied are residential developments. Driveway traffic counts conducted at the TOD sites were compared to the forecast trip generation that would be calculated using applicable and unadjusted trip rates from the ITE Trip Generation manual. Based on the traffic count data collected to the TODs, the TRB report concludes the following:

- Daily (24-hour): 44 percent fewer vehicle trips at TODs as compared to ITE trip rate
- AM peak hour: 49 percent fewer vehicle trips at TODs as compared to ITE trip rates
- PM peak hour: 48 percent fewer vehicle trips at TODs as compared to ITE trip rates

The Caltrans report evaluated trip generation at eight urban infill sites located in close proximity to transit stations and/or transit hubs in the Berkeley and San Diego areas. The eight TOD sites studied are residential developments. Driveway traffic counts conducted at the TOD sites were compared to the forecast trip generation that would be calculated using applicable and unadjusted trip rates from the ITE Trip Generation manual. Based on the traffic count data collected at the TODs, the Caltrans report concludes the following:

- AM peak hour: 61 percent fewer vehicle trips at TODs as compared to ITE trip rates
- PM peak hour: 60 percent fewer vehicle trips at TODs as compared to ITE trip rates.

It is demonstrated in both reports that vehicular trip generation is substantially reduced at TOD sites as compared to what would otherwise be forecast through use of ITE trip rates (derived from studies of generally suburban and stand-alone development projects). Consequently, because ITE trip generation and parking generation rates are the standards from which local traffic and parking rates are typically derived from, it can be concluded that parking demand ratios are substantially reduced at residential TODs by the same order of magnitude as vehicle trip generation because they are also based on ITE data.

Specifically, the TRB report states that parking supply for residential uses at TOD sites can be reduced by 50 percent at TOD sites. The TRB report states that this is appropriate as residents of TOD sites typically own fewer private vehicles due to smaller household size and the availability of alternative transportation. The Project proposes a 19.75 percent parking reduction from the County non-TOD requirements for residential projects, well below the 50 percent parking supply reduction observed at other residential projects. Thus, sufficient parking is provided on-site and on-street parking by residents is not anticipated to occur.

Response Parsons-3

CEQA Guidelines Sections 15125(a) is clear that the baseline is the conditions of the environment at the time the Notice of Preparation (NOP) is issued and that impacts are assessed against that baseline. The Park-and-Ride Lot existed at the time the NOP was issued for the Project and is thus part of the baseline. The Project will reconfigure the lot to provide 400 parking spaces consistent with the operations and maintenance agreement between Metro and Caltrans that currently controls the number of parking spaces at the Park-and-Ride Lot. As stated in Responses Parsons-1 and Parsons-2, the Project provides parking in an amount adequate to support the demand for parking created by the Project and any parking at the Park-and-Ride Lot by non-transit users will be unauthorized. Therefore, the Project is not expected to increase competition for spaces at the Park-and-Ride Lot.

Response Parsons-4

The Project Description provided by this comment is acknowledged, but contains a factual error. The Project requests a 19.75 percent reduction relative to what would be required for a non-mixed use, non-TOD project under Part 11 of Chapter 22.52.

Response Parsons-5

Please see Responses Parsons-1, Parsons-2 and Parsons-3. The Project will place a high-density residential development adjacent to transit and will provide important retail services and a pedestrian-friendly environment to encourage others to make use of the multi-modal mass transit opportunities at the station.

Response Parsons-6

The fact that a Burden of Proof is required for approval of a parking permit by the Los Angeles County Code is acknowledged. However, the County Code Burden of Proof recited by the commenter is not a threshold of significance for analysis under CEQA. The parking analysis prepared for the Project and analyzed on page 5.1-26 of the Draft EIR demonstrates that proposed parking program is appropriate and sufficient for the Project, which is a mixed-use TOD, and that the Project will not result in parking problems at the Park-and-Ride Lot and surrounding properties with a subsequent impact on traffic conditions.

The Draft EIR contains a thorough analysis supporting the conclusion that the Project will not result in parking problems with a subsequent impact on traffic conditions, which is the appropriate CEQA threshold for analysis relating to parking. Extensive planning studies support reduced parking requirements at TODs such as the Project. In addition to the study in Vancouver referenced by the commenter, the parking permit Burden of Proof also references a study of housing near Bay Area Rapid Transit stations. In addition, as discussed in Response Parsons-2, other recent studies support reduced parking requirements for TOD projects.

Lastly, the Project does not rely on the Park-and-Ride Lot to justify the proposed parking program. As discussed in Response to Parsons-2, the proposed parking program exceeds the potential minimum standards of the applicable MXD Zone and the proposed parking program is consistent with the findings of extensive planning studies concerning demand for parking at TOD projects such as the proposed Project.

Response Parsons-7

Please see Responses Parsons-2 and Parsons-3.



Northrop Grumman Corporation
Aerospace Systems

One Space Park
Redondo Beach, CA 90278

Feb. 28, 2011

Christine Tran, Project Manager
Los Angeles County Department of Regional Planning
320 West Temple Street, Room 1362
Los Angeles, California 90012

**Subject: Draft Environmental Impact Report – Aviation Station Project
State Clearinghouse No. 2009051097**

Dear Ms. Tran:

NORTHROP

Northrop Grumman Corporation appreciates the direct notification by the Los Angeles County Department of Regional Planning (LACDRP) concerning the proposed Aviation Station Project (ASP) and its accompanying “Draft Environmental Impact Report – Aviation Station Project, State Clearinghouse No. 2009051097” (DEIR).



The following comments are submitted to the LACDRP within the 45-day comment period established by the County’s “Notice of Public Hearing/Notice of Completion and Availability of Draft Environmental Impact Report” (NOC) and are intended to become part of the administrative record for the ASP. Thank you for your e-mail of Feb. 24 giving us until this morning to submit these comments.

Northrop Grumman is located directly west of the project site at 1 Hornet Way (El Segundo, California 90245). We currently employ about 5,000 workers at the approximately 78-acre El Segundo facility, which plays a key role in the company’s aerospace operations. Our employees have worked there for more than 30 years on a variety of projects for the U.S. Department of Defense (see enclosed factsheet).

As a longtime member of the El Segundo business community, Northrop Grumman recognizes the benefits from the proximity to the Metropolitan Transportation Authority’s existing Aviation/LAX Station. We also recognize the potential local and regional benefits that may be associated with appropriate transit-oriented development. To the extent that compatible land uses and sensitive site design are proposed, Northrop Grumman can support development of the subject site.

However, because of the historical conflicts between residential and manufacturing-related uses, we have some concerns that the proposed revisions to existing land-use policies and the introduction of high-density residential uses adjacent to our facility raise issues that have not been fully addressed in the DEIR.

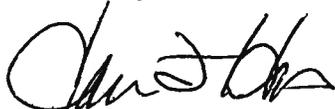
The proposed project, which the DEIR acknowledges to be precedent-setting, could stimulate other development activities that may exacerbate existing residential and industrial land-use conflicts. For example, we can foresee unaddressed demands on our facility for additional off-street parking and physical changes to our existing points of ingress and egress. These modifications would translate into incurred costs to Northrop Grumman. Many of our concerns are also well expressed by the City of El Segundo in its comments on the DEIR. Northrop Grumman concurs in many of those comments.

Despite these concerns, we believe that active participation in the environmental process established under the California Environmental Quality Act (CEQA) will give us the opportunity to discuss these issues, to better understand the nature of the project, and to discuss opportunities for the site's development.

To that end, Northrop Grumman would appreciate the opportunity to meet with LACDRP staff, the applicant's representatives, and the County's environmental consultants. We would like to extend an invitation to come to our El Segundo facility so as to best perceive the relationship between the two properties.

Please call me at 310-812-0916 to schedule this meeting. We look forward to a productive discussion and to welcoming a compatible new neighbor.

Sincerely,



James F. Hart
Sector Manager, External Affairs

enc: Northrop Grumman in El Segundo factsheet

cc: Office of Los Angeles County Supervisor Mark Ridley-Thomas: Mr. Dan Rosenfeld
Office of Los Angeles County Supervisor Don Knabe: Mr. Steve Napolitano, Ms. Julie Moore
Honorable Eric Busch, Mayor of El Segundo
Ms. Kimberly Christensen, El Segundo City Planning Manager
Ms. Jackie Bacharach, Executive Director, South Bay Cities Council of Governments
Mr. Donald Camph, Executive Director, El Segundo Employers Association



Northrop Grumman in El Segundo

Northrop Grumman Corporation's site in El Segundo, Calif., is a major development and manufacturing center for Aerospace Systems, one of the company's five operating sectors. Approximately 5,000 people work there on a variety of production and development programs for the U.S. government.

For more than 30 years, El Segundo has been the site of the company's work on the F/A-18E/F Super Hornet, the U.S. Navy's combat-proven, multirole strike fighter. As principal subcontractor to The Boeing Company, Northrop Grumman produces the center/aft fuselage and twin vertical tails and integrates all associated subsystems for the Super Hornet and its electronic attack variant, the EA-18G Growler.

Northrop Grumman is a principal member of the Lockheed Martin industry team that produces the F-35 Lightning II Joint Strike Fighter for the U.S. Air Force, Navy, Marine Corps and allied defense forces worldwide. Northrop Grumman is responsible for design and integration of the F-35's center fuselage section, including all subsystems; development of a substantial portion of F-35 mission systems software; ground and flight test support; signature and low-observables development support, and modeling and simulation.

Northrop Grumman is the prime contractor to the U.S. Air Force for a next-generation airborne radar that will dramatically improve the ability to track and identify stationary and moving vehicles and low-flying cruise missiles. This project is called the Multi-Platform Radar Technology Insertion Program (MP-RTIP).

El Segundo is also the home of one of Northrop Grumman's major advanced development centers. In addition to laboratories and other technical facilities, the development center houses talented people with the skills that have kept Northrop Grumman on the cutting edge of innovation. The company brings world-class capabilities in system design, air vehicle design, flight controls, vehicle management systems, network-enabling technologies and survivability.

Northrop Grumman Corporation is a leading global security company whose 120,000 employees provide innovative systems, products, and solutions in aerospace, electronics, information systems, shipbuilding and technical services to government and commercial customers worldwide.



**Written Responses to:
Northrop Grumman Corporation (Northrop)**

Response Northrop-1

This comment specifies that this letter is in response to the 45-day public review of the Draft EIR, and is intended to become part of the administrative record, briefly summarizes Northrop's located relative to the project site and the facilities operations (referring to enclosed fact sheet which is referenced as comment Northrop-3), and states Northrop's recognition of the benefits of a transit-oriented development at the Metro Green Line Station and supports site development given land use compatibility is assessed. No response is required, but it should be noted that this comment letter, dated February 28, 2011, was received subsequent to the public review period that closed on February 24, 2011. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Response Northrop-2

The comment, without factual support or analysis, claims that the project may stimulate other development activities that could exacerbate existing residential and industrial land-use conflicts. Section 2.1 and 2.2 of the Draft EIR accurately describe the Project's environmental setting as being highly urbanized with a diverse mix of land uses, situated between an established single-family residential and strip-commercial neighborhood and extensive aviation-related industry and LAX, and located adjacent to a major light-rail station and bus terminal. The portion of the Project site within the County is zoned and used currently for both residential and commercial activities. The portion of the Project site currently within the City of Los Angeles is zoned and used currently for public facilities (i.e., the Metro Green Line Aviation/LAX Station).

The Draft EIR incorporates Northrop Grumman's and other current industrial and manufacturing activities into the baseline environmental setting and analyzes all issues that contribute to land use compatibility issues, such as Noise (Section 3.4), Air Quality (Section 4.2), and Traffic/Access and parking (Section 5.1). This land use compatibility analysis is further supplemented in the Land Use analysis in the Draft EIR (Section 6.2).

For example, the Draft EIR and supporting Air Quality analysis in Section 4.2 of the Draft EIR (Draft EIR Appendix E) examined existing ambient air concentrations of seven "criteria air pollutants" identified by the USEPA to be of concern with respect to the health and welfare of the general public. Additionally, the Draft EIR evaluates toxic air contaminants (TACs, also known as "hazardous air pollutants") that are released by a variety of common sources, including industrial and painting operations, and research and teaching facilities.

Once a TAC is identified, the California Air Resources Board (CARB) adopts an Airborne Toxics Control Measure for sources that emit that particular TAC. These measures are designed to reduce TAC emissions and lower potential risks to human health. For example, the TAC hexavalent chromium is regulated by 17 Cal Code Regs Sections 93102-93102.16, which requires emitters of hexavalent chromium to reduce or eliminate emissions. These measures include, but are not limited to, the use of add-on air pollution devices such as HEPA filters to control emissions; biannual environmental compliance training for owners, operators, and/or employees; performance tests as necessary; and stringent inspection, maintenance, and reporting requirements. Through compliance with CARB's measures, potential emitters of TACs can eliminate any potential significant risk of exposure to surrounding residents. As such, the

Project site's proximity to industrial uses, as provided in the Draft EIR, and including, but not limited to, Northrop Grumman, would not result in a significant air quality impact to the future residents and visitors of the site with proposed Project implementation.

Regarding parking, CEQA requires an analysis of whether the Project will result in parking problems with a subsequent impact on traffic conditions. The parking analysis prepared for the Project and presented on page 5.1-26 of the Draft EIR demonstrates that proposed parking program is appropriate and sufficient for the Project, which is a mixed-use TOD, and that the Project will not result in parking problems at the Park-and-Ride Lot and surrounding properties, such as the Northrop Grumman facility, with a subsequent impact on traffic conditions. Please also see Response DANA-7.

Please refer to Section 3.4, Noise, Section 4.2, Air Quality, Section 5.1, Traffic/Access, and Section 6.2, Land Use, of the Draft EIR, and any revisions set forth in Section 2.0, Errata, regarding these sections, for a complete discussion of these issues, which contribute to the overall land use compatibility issue. Therefore, the EIR thoroughly analyzed the Project's compatibility with surrounding land uses, including Northrop Grumman's industrial facility, and based on that analysis, concluded the Project is compatible with the surrounding community. Revisions to Section 6.2, Land Use to reflect details about the operations at the adjacent Northrop Grumman site are provided in Section 2.0, Errata.

Response Northrop-3

The Project Applicant and Northrop Grumman representatives met on March 9, 2011 to discuss concerns set forth in their comment letter.

Response Northrop-4

This comment is a fact sheet on Northrop Grumman's facility in El Segundo, and is referenced in comment Northrop-1. No response is required. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

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