

December 6, 2012

To: David Martin, Planning Director

From: Santa Monica Coalition for a Livable City

Re: Request that City Submit a Comment Letter on the FEIR Objecting to Significant Traffic Impacts of the Casden Sepulveda Project on Santa Monica

Dear Mr. Martin:

As I mentioned to you last night, the City of Santa Monica has the opportunity and the obligation to comment upon the very serious traffic impacts on Santa Monica of a huge nearby proposed project -- the Casden project at Pico and Sepulveda in Los Angeles. As LUCE makes clear, transportation planning must be regional. Time is running out: Santa Monica has only 2 weeks to be heard.

We urge you, on behalf of the City of Santa Monica, to review the Final Environmental Impact Report ("FEIR") released in November 2012 concerning the significant, unavoidable traffic impacts for the massive Casden project. Our LUCE sets forth the responsibility of Santa Monica to "collaborate with surrounding jurisdictions to seek appropriate mitigation measures to minimize the potential negative impacts on Santa Monica from projects in surrounding jurisdictions." (Circulation Goal T15.4). This is especially so here, where as discussed below, **this project FEIR estimates that the Casden project will generate 12,000 to 14,000 new daily vehicle trips at our doorstep.**

Our City must take this obligation seriously, as it did when it expressed its deep concerns about the unacceptable traffic impacts of the massive Bundy Village Project at Olympic and Bundy on 15 intersections bordering or within the City of Santa Monica. Santa Monica's comments indicated where the impacts were too severe and would need mitigation and also required Santa Monica's agreement on how traffic would be mitigated. A copy of the City's letter is enclosed. This Casden project is even potentially more far reaching than Bundy Village in its dire impacts on Santa Monica.

In addition, our planning decisions, EIRs, and the Bergamot Area Plan also must include the possibility of a project of Casden's size and traffic impacts into account when evaluating projects in our City. We have a host of pending development proposed in this same area, including but not limited to the Martin Cadillac project, the Trammell Crow Pico project, and all projects currently in the Bergamot Area, including the Hines/Papermate project. They are all sufficiently close to this project to feel the blunt effects of traffic generated by the Casden project on the surrounding streets and the 10-Freeway. Indeed, these regional traffic spillover effects would also impact the Downtown Specific Plan for Santa Monica discussed last night at the workshop.

The Casden Project and its Serious Traffic Impacts

Enclosed is a copy of the hearing notice and project description for the Casden project that took place yesterday. Henry Chu, the hearing officer, indicated that **the comment period will be extended for 2 weeks from December 5, 2012 to allow for additional review by all interested parties and welcomed all comments.** Mr. Chu prefers to receive comments by email, if possible.

This Casden project is a massive project – **784,564 square feet and building heights of up to 15 stories (200 feet) with 266,800 square feet proposed for commercial uses and over 500,000 square feet for residential units.** The developer is requesting a General Plan amendment, as well as a height district change.

As currently proposed, the development will have significant traffic impacts at 22 intersections extending from Culver City to Wilshire Boulevard. Notwithstanding the fact that this project is proposed adjacent to an Expo Stop, the FEIR indicates that between 12,000 and 14,000 additional daily vehicle trips will be generated which would overwhelm the surrounding neighborhood and perhaps even defeat transit ridership if it is too time-consuming to fight through the congestion to get to the station.

This means that Santa Monicans (and those who travel in and out of our City daily) will be severely impacted and will feel the brunt of this increased congestion going east in the afternoon or west in the morning. We are already in gridlock most mornings and evenings, robbing us all of our time, polluting the environment and diminishing the quality of our lives.

Among the chief deficiencies raised by the traffic analysis in the FEIR are that: 1) the developer overstated the baseline traffic counts by as much as 18% from what the most recent traffic counts done by the Department of Transportation (“DOT”) show, therefore misrepresenting the real magnitude of the impact of the additional trips the project would generate as well as mitigations; 2) cut through traffic on adjacent neighborhood streets was not analyzed as it should have been and 3) other projects nearby, including at 2900 Sepulveda and 3400 Pico were not included

Although the community comments at the hearing yesterday were overwhelmingly negative as to the unacceptable size and impacts of this project relative to its surroundings, and as to whether it truly was a transit oriented development (“TOD”), and despite both Councilmembers in District 5 and 11 going on record at the hearing opposing the project in its current size, this project is on an expedited track to go before the City of LA’s Planning Commission and City Council soon.

We therefore urge you to review and critique the FEIR as to the traffic impacts of the project on Santa Monica and to provide your comments timely to Mr. Chu.

Lastly, please kindly confirm that the City of Santa Monica will take this important opportunity to comment on the FEIR for this project and the significant impacts that are disclosed. Thank you.

If we can be of additional assistance, please let us know.

Sincerely,

Diana Gordon
Co-Chair, Santa Monica Coalition for a Livable City

Cc: Francie Stefan
Rod Gould
Marsha Moutrie
Santa Monica City Council
Santa Monica and Westside Neighborhood Association Leaders

Enclosures



DEPARTMENT OF CITY PLANNING

NOTICE OF PUBLIC HEARING

To Owners: Within a 100-Foot Radius
 Within a 500-Foot Radius
 Abutting a Proposed Development Site

And Occupants: Within a 100-Foot Radius
 Within a 500-Foot Radius
And: Others

This notice is sent to you because you own property or are an occupant residing near a site for which an application, as described below, has been filed with the Department of City Planning. All interested persons are invited to attend the public hearing at which you may listen, ask questions, or present testimony regarding the project.

Hearing By:	Hearing Officer	Case No.:	CPC-2008-4604-GPA-ZC-HD-CUB-DB-SPR
Date:	Wednesday, December 5, 2012	CEQA No.:	ENV-2008-3989-EIR
Time:	10:00 a.m.	Incidental Cases:	None
Place:	West Los Angeles Municipal Building Hearing Room, Room #200 1645 Corinth Avenue Los Angeles, CA 90025	Related Cases:	VTT-70805-GB
		Council Nos.:	5- Koretz, 11-Rosendahl
		Plan Area:	West Los Angeles
		Specific Plan:	West Los Angeles Transportation Improvement and Mitigation
Staff Contact:	Henry Chu	Certified NC:	Westside
Phone No.:	(213) 978-1324	GPLU:	Light Manufacturing and Public Facilities
		Zone:	M2-1-O and PF-1XL
		Applicant:	Casden West LA, LLC and Los Angeles County Metropolitan Transportation Authority (MTA)
		Representative:	Howard Katz

PROJECT LOCATION: 11122 W. Pico Boulevard, 2431-2441 S. Sepulveda Boulevard, and 11201 W. Exposition Boulevard including the adjacent MTA railroad right-of-way along Exposition Boulevard as shown on the attached map.

AND City included "Add Area": properties bound by Pico Boulevard to the north, Sawtelle Boulevard to the west, Exposition Boulevard to the south, and Sepulveda Boulevard to the east including 11110 to 11240 Pico Boulevard (excluding 11122 W. Pico Boulevard) (all other adjacent properties on the southerly side of Pico Boulevard between Sawtelle Boulevard and Sepulveda Boulevard, as shown on the attached map).

PROPOSED PROJECT: The Proposed Development Project includes demolition of the three existing industrial structures and construction of four residential structures above two levels of commercial uses. The mixed-use project includes approximately 266,800 square feet (sq. ft.) of commercial uses and approximately 538 residential units (518,764 sq. ft), including 59 units restricted to Very Low Income Senior Households, and amenities such as a recreation center and a landscaped common courtyard area between the residential structures. The total floor area to be constructed will be 784,564 sq. ft. on a project site of 283,190 sq. ft. (6.5 acres). In total, 2,029 parking stalls will be provided for both residential (962) and commercial (1,067) uses combined in five levels of subterranean parking. Building heights would vary from approximately four and five stories above the two commercial levels (108 feet above grade and 118 feet above grade, respectively) along Sepulveda Boulevard, approximately six and seven stories above the two commercial levels (114 feet above grade and 123 feet above grade, respectively) along Pico Boulevard, and approximately 15 stories (approximately 200 feet above ground surface) above the two commercial levels in the western portion of the site.

For the Add Area: **No projects are proposed at this time.**

- REQUESTED ACTION:**
1. Pursuant to Section 21082.1(c)(3) of the California Public Resources Code, **Certification** of the Environmental Impact Report (EIR), ENV-2008-3989-EIR, SCH No. 2009061041, for the above-referenced project, and the following:
 - a. **Adoption** of the Statement of Overriding Considerations setting forth the reason and benefits of adopting the EIR with full knowledge that significant impacts may remain.
 - b. **Adoption** of the proposed Mitigation Monitoring Program and Reporting Program and the required Findings for the adoption of the EIR.
 2. 11122 W. Pico Boulevard; 2431-2441 S. Sepulveda Boulevard; and 11201 W. Exposition Boulevard including the adjacent MTA railroad right-of-way along Exposition Boulevard and ADD AREA: Pursuant to Section 11.5.6 of the Municipal Code, a **General Plan Amendment** to the West Los Angeles Community land use from Light Manufacturing Industrial and Public Facilities to Community Commercial;
 3. 11122 W. Pico Boulevard; 2431-2441 S. Sepulveda Boulevard; and 11201 W. Exposition Boulevard including the adjacent MTA railroad right-of-way along Exposition Boulevard only: Pursuant to Section 12.32 of the Municipal Code, a **Zone Change** from M2-1-O (Light Industrial) and PF-1XL (Public Facilities) to (T)(Q)C2-1-O (Community Commercial) and **Height District Change** on portions of the site presently zoned PF-1XL from "1XL" to "1";
 4. Pursuant to Section 12.24 W.1 of the Municipal Code, a **Conditional Use** to permit the off-site sales of a full-line of alcoholic beverages for one grocery tenant and for one retail tenant in the proposed (T)(Q)C2-1-O zone;
 5. Pursuant to Section 12.22 A.25 of the Municipal Code, in consideration of providing 59 of the dwelling units (about 11%) as restricted affordable units to Very Low Income Senior Households. Additionally the applicant requests one **Affordable Housing Incentives** as follows:
 - A. Per Section 12.22 A.25 (f)(4) of the Municipal Code, to permit a 3:1 FAR (maximum 849,570 square foot building) instead of the otherwise permitted 1.5:1 FAR (maximum 424,785 square foot building) on an approximately 283,190 sq. ft. site.

6. Pursuant to Section 16.05 of the Municipal Code, a **Site Plan Review** approval for a development which will result in an increase of more than 50,000 square feet of non-residential floor area and a development which results in an increase of 50 or more dwelling units.

The purpose of the hearing is to obtain testimony from affected and/or interested persons regarding this project. The environmental document will be among the matters considered at the hearing. The decision maker will consider all the testimony presented at the hearing, written communication received prior to or at the hearing, and the merits of the project as it relates to existing environmental and land use regulations.

EXHAUSTION OF ADMINISTRATIVE REMEDIES: If you challenge a City action in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence on these matters delivered to the Department before the action on this matter will become a part of the administrative record. Note: This may not be the last hearing on this matter.

ADVICE TO PUBLIC: The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to (Insert contact information, division and address).

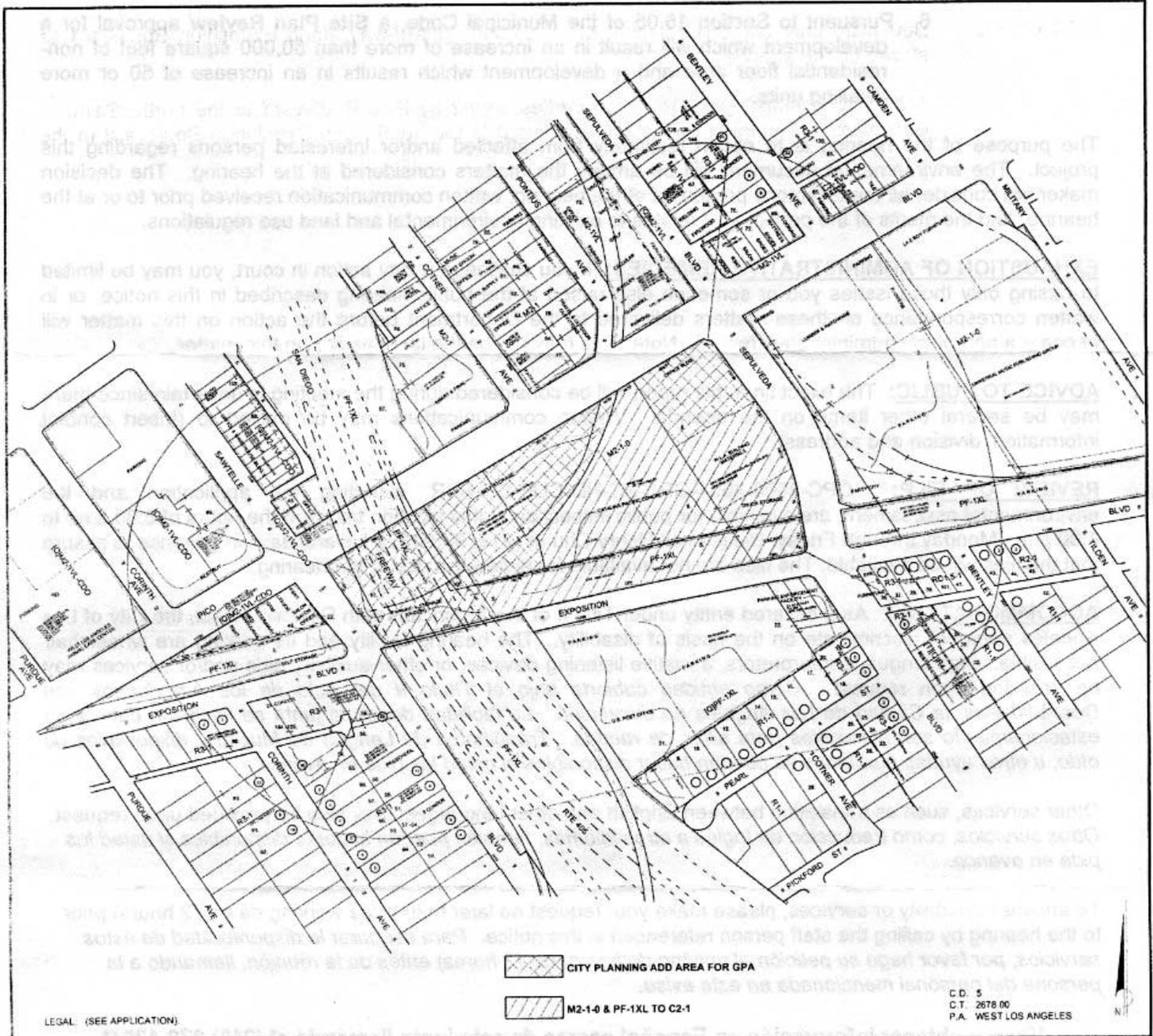
REVIEW OF FILE: CPC-2008-4604-GPA-ZC-HD-CUB-DB-SPR, including the application and the environmental assessment, are available for public inspection at this location between the hours of 8:00 a.m. to 4:00 p.m., Monday through Friday. Please call Henry Chu at (213) 978-1324 several days in advance to assure that the files will be available. The files are not available for review the day of the hearing.

ACCOMMODATIONS: As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability. The hearing facility and its parking are wheelchair accessible. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or services may be provided upon request. *Como entidad cubierta bajo el Título II del Acto de los Americanos con Desabilidades, la Ciudad de Los Angeles no discrimina. La facilidad donde la junta se llevará a cabo y su estacionamiento son accesibles para sillas de ruedas. Traductores de Lengua de Muestra, dispositivos de oído, u otras ayudas auxiliares se pueden hacer disponibles si usted las pide en avance.*

Other services, such as translation between English and other languages, may also be provided upon request. *Otros servicios, como traducción de Inglés a otros idiomas, también pueden hacerse disponibles si usted los pide en avance.*

To ensure availability of services, please make your request no later than three working days (72 hours) prior to the hearing by calling the staff person referenced in this notice. *Para asegurar la disponibilidad de éstos servicios, por favor haga su petición al mínimo de tres días (72 horas) antes de la reunión, llamando a la persona del personal mencionada en este aviso.*

Puede obtener información en Español acerca de esta junta llamando al (213) 978-1324



 CITY PLANNING ADD AREA FOR GPA
 M2-1-0 & PF-1XL TO C2-1

C.D. 5
 C.T. 2678.00
 P.A. WEST LOS ANGELES

LEGAL (SEE APPLICATION)

GC MAPPING SERVICE, INC.
 3055 WEST VALLEY BOULEVARD
 ALHAMBRA CA 91803
 (626) 441-1080 FAX (626) 441-8650
 gcmapping@radiusmaps.com

**GENERAL PLAN AMENDMENT
 ZONE CHANGE
 E.I.R.**

CASE NO.
 DATE: 10-11-2012
 SCALE: 1" = 100'
 USES: FIELD
 D.M. 123 B 153
 126 B 153
 T.B. PAGE 632 GRID: C-6



Eileen Fogarty
Director

Planning & Community
Development Department
1685 Main Street
PO Box 2200
Santa Monica, California 90407-2200

June 15, 2009

Mr. Jimmy Liao and Diana Kithching
City Planners, EIR Unit
Division of Land/Environmental Review
Room 750, City Hall
Department of City Planning
200 North Spring Street
Los Angeles, CA 90012

Re: Comments on DEIR for Bundy Village and Medical Park Project

Dear Mr. Liao and Ms. Kitching:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) prepared for the Bundy Village and Medical Park project located at 1901, 1925, and 1933 South Bundy and 12333 Olympic Boulevard in the City of Los Angeles. This letter constitutes the City of Santa Monica's comments on the environmental analysis prepared for the project. The City's comments are solely related to the traffic analysis section of the report.

The City of Santa Monica is deeply concerned about the impacts of this project on Santa Monica streets. Based on the City of Los Angeles (LADOT) impact criteria, 15 out of the 25 intersections within or bordering on the City of Santa Monica are significantly impacted. These intersections include:

1. Colorado Avenue/Stewart Street
2. Olympic Boulevard/20th Street
3. Olympic Boulevard/Cloverfield Boulevard
4. Olympic Boulevard/26th Street
5. Olympic Boulevard /Stewart Street
6. Olympic Boulevard/Centinel Avenue (north leg)
7. Olympic Boulevard/Centinel Avenue (south leg)
8. Centinela Avenue/I-10 WB On-/Off-Ramps
9. Pico Boulevard/23rd Street
10. Pico Boulevard/Cloverfield Boulevard
11. Pico Boulevard /I-10 EB Off-Ramp
12. Pico boulevard/Centinel Avenue
13. Centinela Avenue /I-10 EB On-Ramp
14. Ocean Park Boulevard/23rd Street
15. Ocean Park Boulevard/Centinel Avenue

tel: 310 458-2275 • fax: 310 576-4755

An additional 2 intersections would be impacted under the Critical Movement Analysis, according to LADOT significance criteria:

1. Santa Monica Boulevard/Cloverfield Boulevard
2. Pico Boulevard/Lincoln Boulevard

The document characterizes the City of Santa Monica's methodology and impact criteria as the same as that for the City of Los Angeles, which is mistaken. The City of Santa Monica's criteria are provided for your reference in Attachment A. It is unclear whether there would be additional or more severe impacts using the City of Santa Monica's criteria because the intersection volume-to-capacity (V/C) and average vehicle delay data are not provided in the document we received. Finally, the trip generation methodology provides a credit for medical office as being neighborhood serving. The City does not agree with this assumption.

The proposed mitigation measures at the border intersections deteriorate the built environment for pedestrians, transit riders and residents and are not acceptable to the City of Santa Monica. Any proposed mitigations in or at the border of the City of Santa Monica need to be discussed and agreed to by the City of Santa Monica. The document also refers to compensation by the developer for "fair share" impacts. The "fair share" methodology needs to be clarified and the City of Santa Monica needs to agree. Finally, although the Exposition Boulevard/Centinela Avenue intersection was not analyzed in the DEIR, the City is requesting signalization.

Please refer to Attachment B, which provides the City's detailed comments regarding the analysis for intersections and right-of-way within or bordering on the City of Santa Monica. One issue we are particularly concerned with is that the preferred haul route is identified as entirely on Centinela Avenue to the I-10 Freeway (adjacent to our residents) and avoids the reality that Bundy Drive has the most street frontage and will be the destination/origination of at least some of the trucking activity. The Bundy entrance to the I-10 Freeway should also be identified.

If you have questions, need clarification or would like to discuss our comments, please contact Sam Morrissey, Principal Transportation Engineer at: sam.morrissey@smgov.net or Beth Rolandson Principal Transportation Planner at: beth.rolandson@smgov.net. Both of them can also be reached by calling (310) 458-8291.

Yours truly,



EILEEN FOGARTY
Director, Planning and Community Development Department



Transportation Management Division
 1685 Main Street, Room 115, PO Box 2200
 Santa Monica, CA 90407-2200
 310/458-8291

ATTACHMENT A

**City of Santa Monica Significance Criteria
 Arterial and Collector Intersections**

Future Base Scenario	Future Plus Project Scenario
If LOS = A, B, or C → and is a collector street intersection → and is an arterial intersection	Significant Impact If: Average vehicle delay increase is ≥ 15 seconds Or LOS becomes D, E, or F Average vehicle delay increase is ≥ 15 seconds Or LOS becomes E or F
If LOS = D → and is a collector street intersection → and is an arterial intersection	Significant Impact If: Any net increase in average seconds of delay per vehicle Average vehicle delay increase is ≥ 15 seconds Or LOS becomes E or F
If LOS = E → and is a collector or arterial intersection	Significant Impact If: Any net increase in average seconds of delay per vehicle
If LOS = F → and is a collector or arterial intersection	Significant Impact If: HCM V/C ratio net increase is ≥ 0.005



Transportation Management Division
1685 Main Street, Room 115, PO Box 2200
Santa Monica, CA 90407-2200
310/458-8291

City of Santa Monica Significance Criteria Collector, Feeder and Local Streets

COLLECTOR STREETS	
A transportation impact is significant if the Base Average Daily Traffic Volume (ADT) is:	Greater than 13,500 and there is a net increase* of one trip or more in ADT due to project related traffic
	Greater than 7,500 but less than 13,500 and the project related traffic increases* the ADT by 12.5% or the ADT becomes 13,500 or more
	Less than 7,500 and the project related traffic increases* the ADT by 25%
FEEDER STREETS	
A transportation impact is significant if the Base Average Daily Traffic Volume (ADT) is:	Greater than 6,750 and there is a net* increase of one trip or more in ADT due to project related traffic
	Greater than 3,750 but less than 6,750 and the project related traffic increases* the ADT by 12.5% or the ADT becomes 6,750 or more
	Less than 3,750 and the project related traffic increases* the ADT by 25%
LOCAL STREETS	
A transportation impact is significant if the Base Average Daily Traffic Volume (ADT) is:	Greater than 2,250 and there is a net increase* of one trip or more in ADT due to project related traffic
	Greater than 1,250 but less than 2,250 and the project related traffic increases* the ADT by 12.5% or the ADT becomes 2,250 or more
	Less than 1,250 and the project related traffic increases* the ADT by 25%

*Average Daily Traffic Volume “increase” denotes adverse impacts; “decrease” denotes beneficial impacts

ATTACHMENT B

**City of Santa Monica Comments on the
Bundy Village and Medical Park DEIR
June 15, 2009**

Page	Comment
IV.K-2	Wilshire Boulevard has bus only lanes during peak hours and should be described as such. The City of Santa Monica generally does allow on street parking on Pico Boulevard.
IV.K-7	Parking is not permitted along segments of Cloverfield Boulevard north of the Santa Monica Freeway, with parking allowed adjacent to residential properties south of the freeway. On-street parking is generally permitted on 20 th Street adjacent to residential properties, but not adjacent to commercial properties north of the Santa Monica Freeway.
IV.K-15	Comparison of the Year 2006 intersection count data to Year 2007 count data collected by the City of Santa Monica shows high degrees of variation. At the four intersections selected for "correlation" analysis in the EIR that are within/adjacent to the City of Santa Monica, traffic volumes vary from 15% to 48% during AM and PM peak hours (See attached <u>Exhibit 1</u>). The comparison to Year 2007 count data collected by the City of Santa Monica therefore indicates a lack of correlation to Year 2006 count data used in the DEIR traffic analysis.
IV.K-25	The City of Santa Monica respectfully requests that intersections entirely within and partially within Santa Monica be evaluated using the City of Santa Monica's significance criteria (Attachment B).
IV. K-29	Bundy Drive should also be considered as a haul route, especially for vehicles accessing the site from the location with the most street frontage, which is Bundy itself. Use of Centinela Avenue should be minimized as it is adjacent to a residential neighborhood between Exposition Boulevard and the Santa Monica Freeway.
IV.K-40	Table IV.K-5 presents project trip generation rates used in the study. Why were the trip generation formulas used, rather than specific values of trips/unit? Particularly for more standardized uses such as General Office and Condominium, ITE rates used should be consistent with other recent studies and/or reflect the specific values presented in the ITE Trip Generation Manual.

ATTACHMENT B

**City of Santa Monica Comments on the
Bundy Village and Medical Park DEIR
June 15, 2009**

Page	Comment
IV.K-41	<p>Can more detail be provided regarding the justification for internal capture rates, rather than simply consultation with staff? Internal capture rates can vary significantly depending on the type of use and demographics of the development. The DEIR presents a nearly 10% overall reduction in daily trips and between 25% to 48% reduction in AM and PM peak hour trips, respectively, due to internal capture; these percentages seem very high.</p> <p>Medical office facilities are generally regional in nature and should not be considered a neighborhood use with the subsequent reduction in vehicle trip generation.</p> <p>It is unclear how neighborhood friendly the site will be; with very little street frontage it will be difficult for pedestrians and bicyclists to access the site with the vehicular access that dominates the street frontage.</p>
IV.K-45	<p>Table IV.K-7 presents project trip distribution percentages. What is the justification for these distribution patterns? Is the distribution of trips based on the application of any travel demand models? More explanation and documentation should be provided.</p>
IV.K-59 & 61	<p>Figures IV.K-10 and IV.K-11 present driveway AM and PM peak hour trips. When summing the inbound and outbound trips, the total AM and PM peak hour driveway trips do not equal the project trip generation numbers shown on Table IV.K-6 (Pgs. IV.K-42 & 43), even when the pass-by trips are included in the generation. Please explain the discrepancy.</p>
IV. K-65	<p>Future (2011) Traffic Conditions is not an appropriate time frame for occupancy of the project as the likelihood of the project being built and occupied by 2011 is extremely low.</p>
IV.K-66	<p>Provide more justification for the 1.0 percent per year ambient growth factor. Is this factor based on any application of travel demand models, or simply a review of historic trends?</p>
IV.K-86	<p>Please provide an updated timeline of the implementation of the 'Pico/Olympic Plan' to justify the appropriateness of describing the first phase as being in place as of 2011 or when the most realistic occupation of the project is expected.</p>
IV.K-92	<p>The City of Santa Monica has its own adopted impact criteria (Attachment B) that should be used to evaluate the impacts within the City of Santa Monica.</p>

ATTACHMENT B

**City of Santa Monica Comments on the
Bundy Village and Medical Park DEIR
June 15, 2009**

Page	Comment
IV.K-125	<p>Why is there no difference identified between direct and cumulative project impacts? The DEIR should evaluate direct traffic impacts (e.g., existing plus project conditions) in order to identify project-specific contributions to traffic impacts.</p> <p>Construction traffic should be routed away from the residential area adjacent to Centinela Avenue between Exposition Boulevard and the Santa Monica Freeway.</p> <p>There are six impacted intersections that are managed jointly by the City of Santa Monica and the City of Los Angeles as at least one leg of each intersection lies within Santa Monica.</p>
IV.K-128	<p>Mitigation K-6 specifies the addition of one dedicated eastbound right-turn lane on Colorado Avenue, and the conceptual drawing proposes a lane configuration consisting of one 10-foot left-turn lane, one 10-foot through lane, and one 12-foot right-turn lane. This lane configuration would likely be unacceptable to the City of Santa Monica. There does not appear to be adequate paved width to accommodate this proposed lane configuration with acceptable lane widths. Additionally, as the DEIR reports, that this mitigation would merely 'formalize' the operation of the intersection, thus there would be no actual change to the operation of the intersection. This impact should be characterized as significant and unavoidable.</p>
IV.K-129	<p>Mitigation K-9 at Olympic Boulevard and Centinela Avenue (south leg) is an intersection that is shared with the City of Santa Monica. Reducing the existing sidewalk width along the west side of Centinela Avenue south of Olympic Boulevard is not acceptable to the City of Santa Monica. This is a sidewalk that will be used by the residents of the neighborhood directly to the south to access retail destinations, such as the one proposed, and discouraging pedestrian activity is not consistent with the City of Santa Monica's philosophy on mitigation measures. Please consider reducing the impact by removing the on-street parking on the west side of Centinela Avenue instead; while this parking does serve the commercial buildings in the area, the buildings immediately adjacent to this area have their own off street parking.</p>
IV.K-130	<p>Mitigation K-12 suggests reducing the existing sidewalk widths within the City of Santa Monica. Reducing the width of the sidewalk and eliminating parkway is not acceptable to the City of Santa Monica. Please coordinate any proposed changes to this intersection with both the City of Santa Monica and the California Department of Transportation.</p> <p>Mitigation K-13 also suggests removing parkway and reducing sidewalk width. This is not only unacceptable for a major boulevard but there is a bus stop with shelter at this location. If anything more amenities and space should be dedicated to transit riders at this location rather than fewer.</p>

ATTACHMENT B

**City of Santa Monica Comments on the
Bundy Village and Medical Park DEIR
June 15, 2009**

Page	Comment
IV.K-131	Mitigation K-19 recommends widening both sides of Centinela Avenue north and south of the east bound on-ramp 'as necessary.' The mitigation measure needs to be more specific as to how this can be accomplished: by removing crosswalk, by purchasing private property, or by widening the freeway overpass? Changing the curb line, reducing parkways and reducing sidewalk widths are not acceptable to the City of Santa Monica.
IV.K-132	<p>Mitigation K-20 describes reconfiguring the intersection to convert the southbound through lane to a shared left turn and through lane. The operation of this intersection for pedestrians must also be considered as this configuration will lead to a minimum of three phases for pedestrians, including: 1. east-west travel on both the north and south legs of the intersections 2. north-south travel on the east leg of the intersection, and 3. north-south travel on the west leg of the intersection. All pedestrians must be retained to provide access to transit on both sides of Ocean Park as well as the office park and retail on both sides of the street. Retaining this will affect the operation of the traffic signal since it will increase the cycle length and should be analyzed before determining if this is an acceptable mitigation measure.</p> <p>The document describes the previous mitigation measures as affecting intersections 'wholly within or under the operational jurisdiction of the City of Los Angeles.' Many of the intersections along the border with Santa Monica have joint responsibility and the mitigation measure impact the City of Santa Monica. Similarly the City of Santa Monica's analysis methodology and significance criteria should be used.</p> <p>The DEIR must define the fair-share contribution, or methodology for calculating this contribution. Without an analysis of direct project traffic impacts, it is difficult to identify an appropriate fair-share contribution amount. The City of Santa Monica is currently developing and deploying an Advanced Traffic Management System (ATMS), similar to LADOT's ATSAC system. The City would welcome fair-share contributions towards expansion of this system within the City limits.</p>
IV.K-138	Mitigation K-25 specifies the restriping of Lincoln Boulevard at Pico Avenue to include one dedicated northbound right-turn lane. Currently portions of Lincoln Boulevard function as a six-lane facility due to the lack of curbside parking during peak periods. Therefore, the proposed mitigation measure may adversely affect operations. In addition, the City of Santa Monica is currently working with Caltrans to determine the feasibility for peak period bus only lanes on Lincoln Boulevard; the bus only lanes would be located within the existing parking areas along the curbs, with parking restricted during peak periods to provide for the bus only lanes. The DEIR should include coordination with Caltrans and the City of Santa Monica for any proposed mitigation measures.

Attachment: Exhibit 1

2007
PM

Loc #	Intersection	Reference	North			South			East			West			N/S	EW	IS	Percent Change						
			Right	THR	Left	Right	THR	Left	Right	THR	Left	Right	THR	Left				Totals	Totals	N/S	EW	Total		
153	Centinella Ave and Colorado Ave	2006 (Bundy Village EIR)	30	436	126	35	601	23	659	100	464	83	657	20	294	35	339	1251	996	2217				
		2007 (Bundy Village EIR)	29	378	105	52	501	33	586	106	527	134	767	25	295	30	390	1099	1117	2216				
		2007 (City of SM)	36	588	236	37	716	11	764	231	761	173	1165	13	285	71	369	1624	1534	3158				
		Difference (2007 City of SM vs 2006 BV EIR)	6	152	110	2	115	-12	105	121	247	90	508	-7	-9	46	30	373	528	911	29.8%	54.0%	40.5%	
143	Stewart St and Olympic Blvd	2006 (Bundy Village EIR)	73	253	61	387	90	338	211	639	139	1415	46	1600	111	910	179	1200	1026	2800				
		2007 (Bundy Village EIR)	69	274	52	395	73	365	133	571	137	1473	71	1681	94	933	119	1166	966	2877	3793			
		Difference (2007 City of SM vs 2006 BV EIR)	164	413	96	673	132	640	282	1054	214	994	207	1415	255	877	129	1261	1727	2676	4403			
		2007 (City of SM)	91	160	35	286	42	302	71	415	75	421	161	145	144	33	50	61	701	124	577	68.3%	15.1%	
154	Centinella Ave (East) and Olympic Blvd	2006 (Bundy Village EIR)	196	0	501	42	0	0	0	785	1550	0	2335	0	1457	130	1587	697	3922	4619				
		2007 (Bundy Village EIR)	160	0	471	631	0	0	0	713	1495	4	2043	8	1405	109	1541	631	3749	4380				
		2007 (City of SM)	197	3	563	763	5	8	13	754	1485	4	2043	8	1698	109	1815	789	3858	4647				
		Difference (2007 City of SM vs 2006 BV EIR)	1	3	62	66	8	13	26	-31	-265	4	-292	8	241	-21	228	92	-64	28	13.2%	-1.6%	0.6%	
653	Centinella North/1-10 West off and on ramp	2006 (Bundy Village EIR)	0	332	339	661	119	1162	0	1281	191	0	202	393	0	0	0	0	1942	393	2335			
		2007 (Bundy Village EIR)	0	330	540	870	85	887	0	972	207	0	210	417	0	0	0	0	1842	417	2259			
		2007 (City of SM)	0	451	778	1229	131	938	0	1069	342	0	497	839	0	0	0	0	2298	839	3137			
		Difference (2007 City of SM vs 2006 BV EIR)	0	129	439	569	12	-224	0	-712	151	0	295	446	0	0	0	0	356	446	802	18.3%	113.5%	34.3%