Chapter 2
Response to Comments

2.1 Distribution of the Draft EIR

Per the requirements of the California Environmental Quality Act (CEQA), a Notice of Availability (NOA) and Notice of Completion (NOC) for the Draft Environmental Impact Report (Draft EIR) were distributed to interested parties and posted with the County of Los Angeles Clerk's Office and the State Clearinghouse on October 27, 2016. A notice regarding the public review period and time and location for a public meeting (see below) on the Draft EIR was published in the Los Angeles Times and The Argonaut. The Draft EIR was then circulated for review and comments from the public and other interested parties, agencies, and organizations for over 45 calendar days, beginning on October 27, 2016, and closing on December 15, 2016. The Draft EIR was also made available online at: (http://eng.lacity.org/techdocs/emg/venice_aux_pumping_plant.htm) and at the following libraries:

Lloyd Taber-Marina del Rey Library
4533 Admiralty Way
Marina del Rey, CA 90292

Playa Vista Branch Library
6400 Playa Vista Drive
Los Angeles, CA 90094

Venice-Abbot Kinney Memorial Library
501 South Venice Boulevard
Venice, CA 90291

2.2 Comments on the Draft EIR

During the public comment period, all comments or questions about the Draft EIR were directed to:

Dr. Jan Green Rebstock, Environmental Supervisor II
Los Angeles Bureau of Engineering
Environmental Management Group
1149 South Broadway, Suite 600, Mail Stop 939 Los Angeles, CA 90015-2213
Email: jan.green.rebstock@lacity.org.

A public meeting on the Proposed Project to solicit comments on the Draft EIR was also held on November 17, 2016, at the Venice Foursquare Church. A notice regarding the public hearing was published in the Los Angeles Times and The Argonaut prior to the public hearing date. A presentation on the Proposed Project was given by City of Los Angeles Bureau of Engineering and Bureau of Sanitation staff. In addition, public testimony was taken and recorded by a court reporter. No comment cards or letters were received during the public hearing. A copy of the meeting transcript is contained within Appendix L (Public Hearing Transcript) of this Final EIR.
In addition to the public hearing, a total of eight (8) comment letters or emails on the Draft EIR were received from agencies and individuals and which are contained in Table 2-1, below. Section 2.3 below contains the comment letter or email and corresponding responses.

Table 2-1. Public Comments Received on the Draft EIR

<table>
<thead>
<tr>
<th>Letter Code</th>
<th>Date</th>
<th>Individual/Organization</th>
<th>Page Number of Response</th>
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<tr>
<td>State Agencies</td>
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<tr>
<td>S1</td>
<td>Nov 16, 2016</td>
<td>Dianna Watson, IGR/CEQA Branch Chief</td>
<td>2-5</td>
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<td></td>
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<td>State of California, Department of Transportation, District 7, Office of Regional Planning, IGR/CEQA Branch</td>
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<td>S2</td>
<td>Dec 13, 2016</td>
<td>Scott Morgan, Director, State Clearinghouse</td>
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<td>C1</td>
<td>Oct 31, 2016</td>
<td>Troy Evangelho, Planner</td>
<td>2-10</td>
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<td>County of Los Angeles, Department of Beaches and Harbors</td>
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<td>GP1</td>
<td>Nov 7, 2016</td>
<td>Carol Kapp</td>
<td>2-12</td>
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<td>GP2</td>
<td>No date provided (received Nov 8, 2016)</td>
<td>Lynne Shapiro</td>
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<td>GP3</td>
<td>Dec 16, 2016</td>
<td>Eliane Gans</td>
<td>2-21</td>
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<td>GP4</td>
<td>Nov 18, 2016</td>
<td>Steve Bradbury</td>
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<td>GP5</td>
<td>Dec 12, 2016</td>
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2.3 Responses to Comments

Each comment letter and/or email below has been assigned a specific number code referring to the correspondence received. Once assigned a code, the correspondence has been divided into individual sub-codes, intended to capture topical areas raised by the commenter. As an example, a letter received by a state agency would receive the code of S1 and then subsequent sub-codes (e.g., S1-1) included to address specific comments. Copies of the comment letters and the corresponding number are included below. Where applicable, some comments received may require revisions to the Final EIR. Chapter 3 (Modifications to the Draft EIR) of this Final EIR contains those changes, if applicable.
2.3.1 State Government

Dr. Ian Green Rebstock
City of Los Angeles
Public Works, Bureau of Engineering
Environmental Management Group
1149 S. Broadway, 6th Floor, Mail Stop 939
Los Angeles, CA 90015-2213

Re: Venice Auxiliary Pumping Plant
Vic: LA-1/PM 32.232
SCH#15111038
GTS# LA-2016-00258ME

Dear Mr. Rebstock:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Venice Auxiliary Pumping Plant Project.

The proposed project would provide additional reliability and critical redundancies necessary to support the City of Los Angeles' wastewater conveyance and processing system. The project would be sized to supplement the plumping capacity of the VPP for a combined ultimate peak flow capacity of 87 million gallons per day, reflecting wet weather flows of a 10-year storm event.

The nearest State facility to the proposed project is State Route-1. Based on review, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

As a reminder, any transporting of heavy construction equipment and/or materials which require the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. Caltrans recommends that large size truck trips be limited to off-peak commute periods.

In the Spirit of mutual cooperation, Caltrans staff is available to work with your planners and traffic engineers for this project, if needed. If you have any questions regarding these comments, please contact project coordinator Ms. Miya Edmonson, at (213) 897-6536 and refer to GTS# LA-2016-00258ME

Sincerely,

DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

“Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability”
Dianna Watson, IGR/CEQA Branch Chief, State of California, Department of Transportation, District 7, Office of Regional Planning, IGR/CEQA Branch

Response to Comment S1-1

Thank you for your comment. The City understands that the nearest State facility to the Proposed Project is State Route 1 (Lincoln Boulevard). Approval of the Proposed Project is not expected to result in direct adverse impacts to existing State transportation facilities. The City understands that any transporting of heavy construction equipment and/or materials which require the use of oversized-transport vehicles on State Highways will require a Caltrans (California Department of Transportation) permit. Moreover, the City understands that Caltrans recommends that large size truck trips be limited to off-peak commute periods. Based upon this comment and recommendation, an additional mitigation measure will be included in Chapter 3 (Modifications to the Draft EIR) of this Final EIR which indicates the following:

**MM-TRANS-3: Transport of Heavy Construction Equipment and/or Materials**

Provided heavy equipment and/or materials are required to be transported to the project site along State facilities (i.e., State Route 1 [Lincoln Boulevard]), the contractor, on behalf of the LABOE, shall obtain a Caltrans transportation permit, prior to transport and/or delivery of such equipment. In addition, large size truck trips (as defined by Caltrans), shall be limited to off-peak commute hours (i.e., not occurring between 7:00 a.m. – 9:00 a.m. and then again between 4:00 p.m. – 6:00 p.m.).

It should be noted that although the Draft EIR analysis determined that a significant impact would not result, this new mitigation measure has been included at the request of Caltrans and is not a result of impacts associated with the Proposed Project.
Jan Green Rebstock  
City of Los Angeles  
1149 S. Broadway, 6th Floor, Mail Stop 939  
Los Angeles, CA 90015  

Subject: Venice Auxiliary Pumping Plant Project  
SCE# 2015111038  

Dear Jan Green Rebstock:

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 December 12, 2016, and the comments from the responding agency (ies) 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,

[Signature]

Scott Morgan  
Director, State Clearinghouse

Enclosures

cc: Resources Agency

1600 10th Street  P.O. Box 3044  Sacramento, California 95812-3044  
(916) 445-0613  FAX (916) 323-3018  www.opr.ca.gov
Document Details Report  
State Clearinghouse Data Base

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<tr>
<td>Lead Agency</td>
<td>Los Angeles, City of</td>
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<tr>
<td>Type</td>
<td>EIR Draft EIR</td>
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<td>Description</td>
<td>Construction of an auxiliary pumping plant and associated facilities in support of the existing Venice Pumping plant (VPP). The proposed project would provide additional reliability and critical redundancies necessary to support the City of Los Angeles' wastewater conveyance and processing system. Project would be sized to supplement the pumping capacity of the VPP for a combined ultimate peak flow capacity of 87 million gallons per day, reflecting wet weather flows of a 10-year storm event. Components: two-story building/ control center (approx. 32 ft high and 2,500 sf) electrical equipment, utility connections, instrumentation and controls, transformers, generators, three 15 mgd submersible pumps with concrete wet well, influent piping, sluice gate, submerged diversion structure in Grand Canal, and parking (8 spaces) located at 128 Hurricane St.</td>
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**Load Agency Contact**

<table>
<thead>
<tr>
<th>Name</th>
<th>Jan Green Rebstock</th>
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<tbody>
<tr>
<td>Agency</td>
<td>City of Los Angeles</td>
</tr>
<tr>
<td>Phone</td>
<td>213-485-5071</td>
</tr>
<tr>
<td>Fax</td>
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<tr>
<td>Address</td>
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<tr>
<td>Zip</td>
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**Project Location**

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<td>33° 58' 33.44&quot; N / 118° 27' 40.72&quot; W</td>
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**Proximity to:**

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<td>Waterways</td>
<td>Balboa Lagoon, Venice Canal, Pacific Ocean</td>
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<tr>
<td>Schools</td>
<td>Westside Global Magnet</td>
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**Project Issues**

- Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Recreation/Parks; Soil Erosion/Compaction/Grading; Toxic/HAZARDOUS; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wittlands/Riparian; Growth Inducing; Landuse; Cumulative Effects; Other Issues

**Reviewing Agencies**

- Resources Agency; California Coastal Commission; Department of Conservation; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; State Water Resources Control Board, Division of Drinking Water; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Board, Region 4; Native American Heritage Commission; State Lands Commission

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<td>End of Review</td>
<td>12/12/2016</td>
</tr>
</tbody>
</table>
Scott Morgan, Director, State Clearinghouse, State of California, Governor’s Office of Planning & Research, State Clearinghouse and Planning Unit

Response to Comment S2-1

The commenter states that the Lead Agency has complied with the State Clearinghouse review requirements for the Draft EIR document, pursuant to CEQA. No further response to this comment is required.

Response to Comment S2-2

The Document Details Report from the State Clearinghouse database explaining the distribution of the Draft EIR is noted. No further response to this comment is required.
2.3.2 Local Government

C1

Eileen Schoetzow <eileen.schoetzow@lacity.org>

Fwd: Venice Pumping Plant EIR
1 message

Jan Green Rebstock <jan.green.rebstock@lacity.org>  Tue, Nov 1, 2016 at 7:02 AM
To: eileen.schoetzow@lacity.org

Hi - please review EIR and prep answer.

Begin forwarded message:

From: Troy Evangelho <TEvangelho@bh.lacounty.gov>
Date: October 31, 2016 at 4:11:54 PM PDT
To: "Jan.Green.Rebstock@lacity.org" <Jan.Green.Rebstock@lacity.org>
Subject: Venice Pumping Plant EIR

Hi Jan,

I received your DEIR notice for the Venice Pumping Plant. Can you tell me if any of these construction activities will have any impact to the traffic or properties located in the neighboring unincorporated County jurisdiction of Marina del Rey?

Thank you,

Troy Evangelho
Planner, Beaches and Harbors
County of Los Angeles
Department of Beaches and Harbors
13837 Fiji Way
Marina del Rey, CA 90262
Office: 310.305.9533
Email: tevangelho@bh.lacounty.gov

Web | Facebook | Twitter
Troy Evangelho, Planner County of Los Angeles, Department of Beaches and Harbors

Response to Comment C1-1

Thank you for your comment. The Venice Auxiliary Pumping Plant (VAPP) will not introduce any significant traffic impacts to residential streets in the neighboring unincorporated County jurisdiction of Marina Del Rey. Access to the Project Site from State Route (SR) 90 can be obtained from Lincoln Boulevard (SR 1), through Marina Del Rey. Washington Boulevard, located approximately 0.3 mile north of the Project Site, serves as the nearest and primary commercial corridor. The main streets carrying project-related construction traffic (both worker trips and truck trips) through Marina del Rey to the construction site would be: Lincoln Boulevard and Washington Boulevard. Other major streets in Marina Del Rey serving the Proposed Project site are, Marquesas Way, Pacific Avenue, Via Marina and Via Dolce. This is discussed further in the Draft EIR in the traffic section (see pages 3.10-18 through 3.10-21). The lot at 3820 Via Dolce in Marina Del Rey has been identified as a potential laydown area in the Project Description, but the primary laydown area will be Laydown Area 1 located at 128 Hurricane Street, which is right across the street from the existing Venice Pumping Plant (VPP). The 3820 Via Dolce lot will only be used if needed and no soil will be stored there. Trucks traveling to and from the site for the export of soil will use a specific haul route to laydown area located at a City-owned property at 9940 Jefferson Boulevard in Culver City. It is expected that within the Project vicinity, the haul route for soil export and import would follow Hurricane Street, Canal Court, Galleon Street, Pacific Avenue, Washington Boulevard, and Lincoln Boulevard (as discussed on page 3.10-18 in the Draft EIR). As soil haul trucks will be restricted to the hours of 9:00 a.m. to 4:00 p.m., they will avoid morning peak (7:00 a.m. – 9:00 a.m.) and afternoon peak (4:00 p.m. – 6:00 p.m.) commute hours. Construction truck traffic would arrive and depart during allowed construction hours (8:00 a.m. – 6:00 p.m.), deliveries would be staggered throughout the day as work occurs, and to the extent feasible, coordinated to arrive and depart at off-peak commute times.

Construction noise and vibration impacts are significant and unavoidable. The Proposed Project will include a Construction Noise Control Plan to reduce construction noise at nearby residences. Mitigation Measure NOI-1 details several measures to reduce construction noise impacts, including constricting the time of day the use of noisy construction equipment, such as jackhammers and pile drivers, is used. Also, temporary noise barriers with a minimum height of 20 feet and the use of commercially available acoustical panels or blankets lined with sound-absorbing material will be employed around the Project Site. All construction equipment will be equipped with properly operating and maintained mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features that meet or exceed original factory specifications. It is also anticipated that the quietest available type of construction equipment will be used.

The City and/or its Contractor shall maintain good communication with the surrounding community regarding the schedule, duration, and progress of construction activities. Residents at properties within 500 feet of construction activities shall be notified 72 hours in advance of the planned activities prior to the start of work. A Construction Mitigation Coordinator for the Project will be required to maintain a call log, so that the City can track resolution and nature of any complaints. These complaints may range from noise, vibration, dust, traffic, etc. Residents shall be informed of the construction mitigation coordinator and on-site construction supervisor contact information by posting of the phone number on the construction site. In addition, as discussed in Best Management
Practice NOI-1, the City shall work with the construction contractor to identify potential offsite shared office space that could be made available to residents in the immediate vicinity that work at home during weekday construction hours.

Based upon the above and information contained in Section 3.10 of the Draft EIR, impacts related to transportation/traffic (including parking) would be less than significant impacts to Los Angeles County residents located in Marina del Rey.
2.3.3 Interested Parties/Public

GP1

VAPP Draft EIR Comments Nov. 7, 2016

From: Carol Kapp
127 Rees Street
Playa del Rey, Ca 90293  Adjacent Route for Venice Dual Force Main

Why didn’t you The City of LA Department of Public Works present this document last January 21, 2015 at the Local Coastal Development Permit Public Hearing for the Venice Dual Force Main Project (SZS11631)?

This way of presenting projects is death by a 1000 cuts!! Why does Publics Works disrespect the citizens this way? You should have presented it all at once. I am part of an educated public that cares and is interested in our community and projects like this.

The methods used by Public works is DISGENSENOUS. You started this in 2001. Has the plan been to sneak it in piecemeal since 2001? It appears that you hope to target small segments of the area so that you will get your project through without any input from the community. Shame on you. We pay your salaries so you can force feed us your ill conceived plans. What's next?
I remember The Thompson Pumping Plant Flasco of 1998 on Culver Blvd in Playa del Rey. That is why I am writing to you today.

DEWATERING is very important and you need a plan which you did not have in 1998.

I do not know the height restrictions for the proposed area of Venice but 32' appears to loom over the other Pumping plants on Hurricane. While you have briefly mentioned NOISE, LAND SETTLEMENT, LANDSLIDES, LIQUIDFACTION—they are of paramount concern to me.

Where will the workers be parking and laying down equipment. Parking is a precious commodity in Venice.

Is this the project that you would seek if it were next to the Mayor's House?

Do you plan to drop any other bombs of this magnitude on this community?
Carol Kapp – GP1

Response to Comment GP1-1

Thank you for your comment. The Venice Dual Force Main Project (VDFM) is a separate, but related project to the Proposed Project. During the January 21, 2015 Local Coastal Development Permit Public Hearing, the Proposed Project (Venice Auxiliary Pumping Plant) was still in the planning stages and CEQA compliance had not been initiated until further details were known. In addition, the Draft EIR noted this in Chapter 1 (Introduction), Section 1.6 (Related Projects), acknowledging that the both the VDFM, Venice Pumping Plant Manifold Replacement Project, and Venice Pumping Plant Generator Replacement Project are related, but separate projects, but that in combination with the Proposed Project, will provide system reliability and redundancy and allow influent flows from the Coastal Interceptor Sewer (CIS) to be bypassed to the VDFM during extreme weather events or an unforeseen emergency. LABOE and the Bureau of Sanitation (LABOS) are actively and continuously upgrading sewage conveyance and treatment facilities throughout the City in order to ensure proper maintenance and provide redundancy for critical public facilities, such as the Proposed Project (see also Response to Comment GP1-6 for more information on Master Planning projects currently being considered and/or undertaken by LABOS). In addition, as these projects are planned and implemented, they are required to be disclosed to the public and comply with applicable laws, including CEQA. Both agencies have actively engaged the public, agencies with oversight or jurisdiction responsibilities and decision-makers on these projects, including the Proposed Project. It should also be noted that these are separate, independent (but related) projects and that the VDFM has been included as a cumulative project and the combined impacts have been addressed accordingly.

Response to Comment GP1-2

Based on the depth to groundwater, it is anticipated that the Proposed Project would require groundwater dewatering during construction. Section 3.7 (Hydrology & Water Quality) provides both the regulatory framework and requirements associated with on-site dewatering associated with the Proposed Project. As noted in that analysis, discharges of treated or untreated groundwater generated from permanent, temporary dewatering operations or other applicable wastewater discharges not specifically covered in other general or individual NPDES permits are currently regulated under a regional general permit, General Waste Discharge Requirements (GWDR) for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2013-0095, NPDES No. CAG994004). As such, the Proposed Project would be subject to these requirements before dewatering operations are initiated on- or off-site. Moreover, as noted in Section 3.7, construction dewatering wastes (except stormwater) are regulated as low-threat discharges to surface waters. A Notice of Intent (NOI) and Report of Waste Discharge must be submitted to the Los Angeles RWQCB to comply with this General Permit. Therefore, dewatering impacts are addressed in the Draft EIR and will follow the GWDR to minimize impacts to water quality.

Response to Comment GP1-3

As noted in Section 3.8 (Land Use & Planning) of the Draft EIR, the height of the electrical building would be 32 feet, which although above the 30-foot maximum includes roof access structures, etc. and is permitted by the Venice Specific Plan (for residential zones). Exhaust ducts and other ancillary facilities associated with the building, except the heating and cooling mechanism (proposed to be constructed outside and at grade), would be contained within the building. The existing Venice
Pumping Plant is slightly smaller in size and massing than the Proposed Project. The Proposed Project is considered a Public Facilities use, which is not allowed by right in a RW2-1 zone or in a Medium Residential land use designation. The Proposed Project does however qualify as a Public Benefits Project under the public utilities and public services use per LAMC Article 14, Section 14.00(b). Given this, Section 3.8 of the Draft EIR addressed the Proposed Project’s consistency with applicable plans and policies, related to land use and determined that it was consistent. As noted in the analysis for Section 3.8, the land use development and/or modifications within the Venice community are governed by local and state agencies and applicable plans and policies including the California Coastal Act, City of Los Angeles General Plan, and the City’s Administrative Code, City of Los Angeles Municipal Code, Venice Coastal Zone Specific Plan (Venice Specific Plan), and Venice Local Coastal Program Land Use Plan. Based upon that analysis, the Proposed Project was determined to result in less than significant impacts related to land use (excepting for construction-related noise and vibration).

Chapter 2 (Project Description) of the Draft EIR noted that a high quality design is proposed for the electrical building and would complement the scale, massing, design, and architecture of the adjacent residential neighborhood. Section 3.1 (Aesthetics) of the Draft EIR addressed the Proposed Project’s potential to result in impacts on aesthetic resources. The analysis in that Section addressed many of the same policies and plans, but also included design review from the City of Los Angeles Department of City Planning (DCP) Urban Design Studio which incorporated the Venice Specific Plan design elements, the City’s Walkability Checklist and Residential Citywide Design Guidelines. Based upon that analysis, the Draft EIR determined that impacts related to aesthetics would be less than significant.

Response to Comment GP1-4

Section 3.9 (Noise & Vibration) of the Draft EIR addressed noise & vibration impacts related to the Proposed Project. As noted in Section 3.9, with construction of the Proposed Project, significant and unavoidable impacts related to Project construction would result. However, these impacts would be temporary and would cease once project construction is complete. In addition, a Best Management Practice was established and a number of mitigation measures were identified to assist in reducing impacts (see Section 3.9.5 [Mitigation Measures of the Draft EIR]), including the following:

- MM-NOI-1: Prepare and Implement a Construction Noise Control Plan
- MM-NOI-2: Implement ground-borne vibration control measures to reduce construction-generated vibration
- BMP-NOI-1: Offsite Work Space

Moreover, the analysis also determined that all operational noise impacts would be less than significant after implementation of MM-NOI-3 since this measure would require that noise levels from mechanical and electrical equipment comply with applicable regulations.

Section 3.5 (Geology & Soils) of the Draft EIR addressed geotechnical impacts, including landslides, liquefaction and land settlement. As noted in that analysis, the Geotechnical Engineering Report (GER) (see Appendix G of the Draft EIR) indicates that the primary geotechnical issue of concern for the Project Site is related to the uncertified fill soils and the potential for liquefaction. Impacts related to seismically related ground failure, including liquefaction, at the Project Site are therefore considered potentially significant. Potential liquefaction-induced settlement was identified to be on the order of up to 2 inches for the Project Site and 1 inch between the proposed structures and the pipe header. In addition, the Project Site is located in an area identified as having fill material, generally consisting of silty sand and sand with some construction debris, which could expand when
saturated. However, as noted in Section 3.5, the Proposed Project design and construction would incorporate the geotechnical engineering recommendations prescribed in the GER that assessed the potential for liquefaction at the Project Site and developed recommendations to address this issue. The recommendations focus on surficial soils, site preparation, site earthwork, foundations, retaining walls, slabs-on-grade, cement type, and corrosion measures. In addition, the Department of Building and Safety’s Geology and Soils Report Approval Letter and the Department of Public Works Geotechnical Division’s Response to the City of Los Angeles, Department of Building and Safety Geology and Soils Report Correction Letter (see Appendix M of the Final EIR for these reports) also include additional specific construction and design recommendations for the Proposed Project. The updated MM-GEO-1 described in Chapter 3 of this FEIR and included in the Proposed Project Mitigation Monitoring and Reporting Program has been identified as a required project measure to reduce these impacts to less than significant.

The Initial Study (see Appendix A of the Draft EIR) and the GER (see Appendix G of the Draft EIR) determined that the Project Site is not within a zone of earthquake-induced landslide potential, as shown by the State of California Seismic Hazard Zones Map, nor is it located on a slope. Therefore, impacts were determined to be less than significant and were eliminated from further analysis in the Draft EIR.

**Response to Comment GP1-5**

As noted in Section 3.10 (Transportation/Traffic) of the Draft EIR, mitigation measure MM-TRANS-1: Construction Shuttle Workers, would require construction workers to park at an off-site location and then be shuttled on 10 to 15-passenger shuttles or vans to and from the Project Site each workday. Although the exact location of the shuttle base has not been identified, it would be within five miles of the Project Site. The selected contractor would be required to identify and secure a suitable location. Similarly, Chapter 2 (Project Description) of the Draft EIR also noted that three construction Laydown Areas (see Figure 2-2, Project Location Map of the Draft EIR) will be used for material and equipment storage as well as construction staging during the anticipated 2-year construction period. Laydown Area 1 is located at 128 Hurricane Street, which is already part of the Project Site and Laydown Area 2 located at 3821 Via Dolce (Assessor Parcel Number [APN] 4225-013-904) would serve as the primary laydown areas. Laydown Area 3 (APN 4296-001-270) located at 9940 Jefferson Boulevard in Culver City, which is approximately 7 miles east of the Project Site would be used for the majority of the soil stockpile necessary for the Proposed Project. Laydown Area 3 is owned by the City of Los Angeles.

Chapter 2 (Project Description) of the Draft EIR indicated that a total of eight parking spaces will be provided at 128 Hurricane Street to allow for employee and delivery/visitor parking, beach impact zone parking and public parking, including the relocation of coastal parking. Therefore, no significant impacts would occur.

**Response to Comment GP1-6**

LABOS and other City agencies are proactively and continuously seeking to improve and ensure that approaches to infrastructure improvements are made in the interest of public safety and efficiency. To this end these agencies seek out and employ technologies that are able to meet both industry standards and associated regulations, but which also consider new technologies. LABOS’ *Solid Waste Integrated Resources Plan – A Zero Waste Master Plan* (2013) (see: https://www.lacitysan.org/san/sandocview?docname=cnt012522 and which addresses anaerobic
digestion related to wastewater and their role in its plan to reduce solid waste) represents such a plan and identifies specific measures for its implementation. These technologies are then implemented as part of planned projects. Additional examples of the City’s master planning process include its Enhanced Watershed Management Plans, LA River Revitalization Master Plan, City of Los Angeles General Plan (and associated Elements), and Sustainable City Plan.
Dr. Jan Green Rebstock  
City of Los Angeles  
Public Works Bureau of Engineering  
Environmental Management Group  
1149 S. Broadway, 68th Floor, Mail Stop 939  
Los Angeles, CA. 90015-2213  

Dr. Rebstock,  

In addition to the MRI (and your letter does not state whether the water quality impacted means the canal water or the drinking water of nearby residents), it should be noted that there is a school nearby and that any use of Via Dolce during construction should be avoided. Why? Because Via Marina is subject to years of construction: the massive rebuilding of Bar Harbor that is taking place now and will be followed by that of Neptune and then, although still in moratorium, that of a very large hotel on Parcel 9U. Via Dolce must be open to traffic because Via Marina is now home to construction trucking, more and more on a daily basis. Only yesterday at 8:45 a.m., cars could not reach Washington for thirty minutes. 

Also, I question the use of the church at 6 p.m. for a public meeting on this project. Parking will be very limited in that residential area.

Yours truly,  

[Signature]  

Aynne Shapiro  
5100 Via Dolce #312  
Marina del Rey, CA. 90292  

Cc: Councilman Mike Bonin
Lynne Shapiro – GP2

Response to Comment GP2-1

Thank you for your comment. Section 3.7 (Hydrology & Water Quality) addressed project-related impacts associated with hydrology and water quality and determined that impacts were less than significant (including those to the Grand Canal) and no mitigation measures were required. The Initial Study (see Appendix A [Notice of Preparation/Initial Study] of the Draft EIR) determined that the Proposed Project would have no impacts on either potable water supplies or quality and as such, no further analysis in the Draft EIR was required. The Initial Study (see Appendix A of the Draft EIR), which identified the Westside Global Awareness Magnet School located at 104 Anchorage Street, and approximately 0.25-mile northwest of the project site eliminated the analysis of schools with respect to potential hazardous materials impacts from further review in the Draft EIR as the impacts were determined to be less than significant and no mitigation would be required. Thus, this issue was not analyzed further in the EIR.

See Response to Comment C1-1 above regarding traffic related impacts associated with Marina del Rey, including Via Dolce and parking impacts from implementation of the Proposed Project. As noted in the Draft EIR Chapter 2, Project Description, the final haul route for the project will be selected in consultation with the City of Los Angeles Department of Transportation and City of Culver City.

Response to Comment GP2-2

A notice regarding the Public Hearing (see above) and its location for the Draft EIR was published in the Los Angeles Times and The Argonaut. The selection of the Venice Foursquare Church and the timing of the meeting was a chosen based on its close proximity to the Proposed Project and affected residence, its ability to accommodate the anticipated number of attendees, and its previous use for the two Public Scoping Meetings held in 2015. The meeting time of 6:00 PM is considered a typical public meeting time and has been used for past meetings, including the two previous Public Scoping meetings. No issues or concerns with either the meeting location or time were raised during the Public Scoping meetings. It is acknowledged that as with all of Los Angeles, street parking is at a premium. However, attendees were able to find adequate parking (on- and off-street) for the meeting and this issue was not raised at the Public Hearing.
Hello Eliane, thank you for the email. As Dr. Green Rebstock stated at the hearing last month, all of the comments received by the City about this project will be incorporated into the Environmental Impact Report for response. So please know that your comments are taken very seriously and will be investigated.

Thank you again, and please let us know if you have any further questions or comments,

Debbie
I have copied several neighbors on this letter.

Kindly let me know if you have received this.

with the hope that you will not go forward with this proposed project without considerable further review and revision.

I think you for your attention, and consideration.

Sincerely,

Eliane Gans, resident/property owner at:
3933 Esplanade #2, Marina Del Rey, CA 90292

Eliane Gans
December 16, 2016

To: Debbie Dyner Harris, District Director, Council district 11
    Dr. Jan Green Rebstock, Environmental Supervisor II
    Fernando F. Gonzalez, P.E., MBA BCEE, Assistant Division Manager,
    Wastewater Engineering Services Division

RE: VAPP Venice Auxiliary Pumping Plant (SCH# 2015111038)

Dear All and To Whom it May Concern:

I am a resident/property owner and represent 3 tenants in my building, just West, off Hurricane, from the Pumping Station.

I have been present for the presentation that was given at the last meeting on November 17, 2016.

I have three important issues/points to bring to your/everyone’s attention that has anything to do with this project.

1. ARCHITECTURAL DESIGN:
   Did you have RFP for a design competition?
   Were the residents close to the project consulted for feedback on the design?
   Considering the world renowned and prized architects in the Venice/Marina area, were any of them considered for this project?
   Any building in this Marina Area should reflect the property values, and aesthetics of the area.
   The current design is representative of a “Bunker” or a Soviet building. This would only bring all of our property values down!!!
   A beautiful contemporary and aesthetic design can be implemented for any kind of usage; If this were a new Condominium, or other use, a quality design would definitely be created; and would add to the Community and its values.
   I BELIEVE IT IS IMPORTANT FOR RESIDENTS WITHIN CLOSE PROXIMITY TO THE PROPOSED VAPP TO HAVE THE RIGHT TO A DESIGN REVIEW AND BE ABLE TO COMMENT AND REQUEST A REVISION OR NEW DESIGN!!!

2. PROPERTY VALUES:
   OUR PROPERTY VALUES ARE AT STAKE, HENCE PROPERTY TAXES FOR THE CITY OF LA.
   I HAVE OWNED MY PROPERTY FOR 31 YEARS AND IT IS A LIFE INVESTMENT! If the value of my property decreases, it will jeopardize my family and myself!!
Noise: If there is noise and vibration, as stated by Mr. Gonzalez at the meeting, rental prices and property values will decrease.

Trucks and other City Vehicles: coming and going up and down Hurricane and Strong will also affect property values

LANDSCAPING:

The public works, or landscape authorities have stated that the plants that will be planted are to be indigenous to the area --- Thus far, most of those are dead weeds.

If any project is to be built, it should require beautification with landscaping that stays alive, and enhances the environment!

CONCLUSION:

I respectfully request that this entire project be put on Hold, and be reviewed by all residents, as to Design, impact to Values, landscaping, noise, and other matters.

The administrators and proponents of this project DO NOT LIVE HERE!! AND THEREFORE, IT IS SIMPLY A GOVERNMENT PROJECT. YOU HAVE NO STAKE IN OUR FUTURE, OR THE FUTURE OF THE NEXT GENERATION, WHO CHERISH AND CARE FOR THIS NEIGHBORHOOD/COMMUNITY.

THIS AREA IS VERY SPECIAL, IT IS NOT LIKE ANY OTHER CITY AREA OF LOS ANGELES. IT IS, THEREFORE, TO BE TREATED WITH CARE AND UNDERSTANDING FOR THE RIGHTS AND VALUES OF THOSE WHO LIVE HERE!

I thank you for reading this letter, and I trust that you will make every effort to modify, review, restrict or revise this project. I BEG OF YOU ALL!!

Sincerely,

Eliane Gans

Eliane Gans
3933 Esplanade #2, Marina Del Rey, CA 90292 (310) 339-4056
Eliane Gans – GP3

Response to Comment GP3-1

Thank you for your comment. A copy of the comment letter submitted as part of the email has been received and is included in this Final EIR.

As noted in Chapter 1 (Introduction) of the Draft EIR, the Board of Public Works will consider the Final EIR and make a recommendation to the Los Angeles City Council, as the governing body of the City of Los Angeles, regarding certification of the Final EIR and Project approval. The City Council may certify and approve the Final EIR or may choose to not approve the Project. During the environmental review and Project approval process, people and/or agencies may address the Board of Public Works and City Council regarding the Proposed Project. Public notification of agenda items for the Board of Public Works is available here: http://bpw.lacity.org/Agendas.html.

City Council agenda items are posted 72 hours prior to the public meeting. The City Council agenda can be obtained by visiting the City Council:

City Hall
200 North Spring Street
John Ferraro Council Chamber, Room 340
Los Angeles, CA 90012

Alternatively, agendas can also be accessed via the Internet at the following location:
http://lacity.org/city-government/elected-official-offices/citycouncil/council-calendar

Response to Comment GP3-2

The comments are not applicable, per CEQA and therefore, no response is required. However, see Response to Comment GP3-3 through GP3-5 below.

Response to Comment GP3-3

No Request for Proposals (RFP) was issued for the architectural design portion of the Proposed Project. The Proposed Project is in the preliminary engineering design phase and an RFP to finalize the design and construct is anticipated to be issued in 2018. During the two Scoping Meetings, circulation of the Draft EIR, and the Public Hearing, a conceptual design of the building was presented. In addition, Section 3.1 (Aesthetics) of the Draft EIR included photo-simulations of the conceptual design from various points of view (see Figures 3.1-2B and 3.1-3A of the Draft EIR) in order to provide context for building massing, height, architectural form and style and other considerations. As noted in Response to Comment GP1-3 (see above), the building design was reviewed by the DCP’s Urban Design Studio and was required to comply with the Residential Citywide Design Guidelines and the Venice Specific Plan. A high quality design is proposed for the electrical building and would complement the scale, massing, design, and architecture of the adjacent residential neighborhood. Area residents will have an opportunity to provide comments on the building design, during the Planning entitlement process and which is scheduled during Fall/Winter 2017. Residents will be notified in advance of these meetings.

As noted above, as the electrical building was reviewed by the DCP’s Urban Design Studio and has been designed in compliance with the Residential Citywide Design Guidelines and the Venice Specific Plan, the analysis in Section 3.1 (Aesthetics) determined that impacts would be less than
significant. Moreover, CEQA does not require an analysis of impacts to property values for proposed projects and instead, only addresses physical environmental impacts. As required, the Draft EIR did consider qualitative factors, as well as economic and technical factors and long-term benefits and costs when evaluating alternatives to the Proposed Project.

Response to Comment GP3-4

See Response to Comment GP3-3 above regarding property values. In addition, regarding noise and vibration-related impacts, please refer to Response to Comment GP1-4 (above). Deliveries of machinery and equipment will be necessary in order to construct the Proposed Project and will require access along Pacific Avenue and Hurricane Street. None are planned along Strong Drive. As noted in Section 3.10 (Transportation/Traffic) of the Draft EIR, the project would generate equipment and delivery truck trips during each phase of construction. Such trips are estimated to be two per day (four passenger car equivalents [PCE] trips per day) and could include cranes, bulldozers, excavators, and other large items of machinery. In addition, truck trips would also be generated from soil excavation. Section 3.10 of the Draft EIR noted that some 10,000 cubic yards of soil will be excavated and exported during construction Stages 1 and 2, of which approximately 2,300 cubic yards would be stockpiled at Laydown Area 1 and approximately 7,700 cubic yards of soil would be stockpiled at Laydown Area 3. If needed, up to 3,850 cubic yards will be imported (returned) back to the VAPP site to use as backfill during construction Stage 3 and 4. As noted in Table 3.10-2 (Daily Trip Generation by Construction Phase) of the Draft EIR, during peak periods of construction Stages 1 and 2 a total maximum of 104 Total Daily 1-way Passenger Car Equivalent (PCE) Trips would be generated (lasting some 95 days). Similarly, during the peak period for construction of Stage 3 (Pump Station), some 108 daily PCEs would be generated (lasting some 245 days). It should be noted that the analysis contained in Section 3.10 of the Draft EIR determined that construction-related traffic impacts were less than significant. In addition, please also note that the Proposed Project would not add any new City employees or associated trips.

Response to Comment GP3-5

As noted in Chapter 2 (Project Description) of the Draft EIR, the Grand Canal and Ballona Lagoon (components of the Venice Canal System) located immediately adjacent to the Proposed Project are designated as Environmentally Sensitive Habitat Areas (ESHAs) by the California Coastal Commission, County of Los Angeles, and City of Los Angeles. Moreover, Section 3.3 (Biological Resources) of the Draft EIR identified a number of sensitive plant and animal species associated with these resources, including along the Grand Canal banks. It also noted that portions of the Ballona Lagoon have been restored and have increased the functions and values of biological resources within the portion of the ESHA where the project is proposed (Hamilton 2010). Similarly, the Grand Canal has been identified for habitat restoration extending from Washington Boulevard south to the Ballona Lagoon as part of the Grand Canal Restoration Project. Based upon these considerations and in compliance with applicable laws and regulations, a portion of the Grand Canal temporarily disturbed by construction of the cofferdam and diversion structure will be restored and planted with native species. Further, as noted in mitigation measure MM Bio-3 Restoration of Vegetation within Grand Canal, habitat restoration will be performed in coordination with regulating agencies (California Coastal Commission, United States Army Corps of Engineers & Regional Water Quality Control Board) and as required by agency permits; accordingly the final Habitat Restoration Plan will include a native plant palette.
Because a minimal amount of open area would be present at the VAPP site, landscaping would largely be limited to 0.75-inch gravel or crushed stone for erosion and dust control. Depending on space availability and infrastructure requirements, the planting of shrubbery and trees may also be possible. The specific locations and species would be evaluated and then included in a landscape plan that would be prepared during final design.

On the 128 Hurricane Street lot, following completion of project construction, the construction laydown site would be converted to a publicly accessible site with public art, parking, and green open space. The specific locations and species of plantings within the open green space would also be identified in a landscape plan that would be prepared during final design.

**Response to Comment GP3-6**

The commenter’s objections are noted. See Response to Comment GP3-1 and GP3-3 above.
GP4

---------- Forwarded message ----------
From: Steve Bradbury <steve@mycyberstuff.com>
Date: Fri, Nov 18, 2016 at 1:39 PM
Subject: Venice Auxiliary Construction Project
To: Dr Jan Green Rebstock <jan.green.rebstock@lacity.org>
Cc: Debbie Dyner Harris <debbie.dynerharris@lacity.org>, Karen Bradbury <karen@karenbradbury.com>

Jan:

After last nite’s Draft EIR meeting, we were urged to submit additional public comments. Mine specifically relates to the proposed parking lot at 128 Hurricane St. This lot should ONLY accommodate the minimum # of cars required to provide employee parking for the pumping station and should ONLY be accessible during those times when employees are present. There should not be ANY public parking at ANY time. In fact, as was suggested by Debbie from Mike Bonin’s office, there are ways to design the space with landscaping, etc such that there are literally no other available places to park. In addition, I wonder if some form of security can be added (such as an access gate) so that only those with an access card can even drive onto the lot. The goal is to eliminate this area as 1) a parking resource for visitors thereby turning Hurricane St into a tourist destination and 2) a hangout area for vagrants and others who might want to congregate in a less visible area away from Pacific Ave. We already have a recurring noise issue on Hurricane with people who come home drunk and loud late into the evening. There’s no reason to provide additional pace for this to increase.

Thank you,

Steve

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Steve Bradbury  
< 310-529-5964  
steve@mycyberstuff.com
@devbrad
Steve Bradbury – GP4

Response to Comment GP4-1

Thank you for your comment. As noted in Chapter 2 (Project Description) of the Draft EIR, a total of eight parking spaces will be provided at 128 Hurricane Street to address Project-required employee and delivery/visitor parking, Beach Impact Zone parking and relocation of street parking at the terminus of Hurricane Street. These parking spaces are required to meet Venice Specific Plan and California Coastal Commission requirements and cannot be reduced. Moreover, due to California Coastal Act requirements, the public is entitled to access on-street and off-street public parking. Given these considerations, public parking spaces at the lot at 128 Hurricane Street lot cannot be eliminated and/or reduced or access restricted to local residents (including card key entry to the lot located at 128 Hurricane Street). Similarly, a final landscaping plan would need to take into consideration the public parking space requirements and be planned to accommodate these.

Response to Comment GP4-2

See Response to Comment GP4-1 above regarding public access to public off-site parking spaces. In addition, it should be noted that Section 3.10 (Transportation/Traffic) of the Draft EIR indicated that parking within the community is predominantly unrestricted, publicly available, and on street. Moreover, that due to its proximity to the Pacific Ocean, parking demand within the Venice community (including along Hurricane Street) can increase during weekends and summer months. Project required Beach Impact Zone Parking includes two parking spaces to meet this demand. However, the analysis also concluded that neither the temporary loss of parking during construction nor the provision of required public parking (to off-set the loss of parking along Hurricane Street between Canal Court and Esplanade) would be adversely affected with implementation of the Proposed Project. Given this, sufficient area parking exists and as such, the construction of the 128 Hurricane Street parking lot would not increase the number of visitors beyond existing conditions.

Homelessness and vagrancy are issues of concern throughout the City, including within the Venice community. There are existing vagrancy laws to address these issues should they occur and signage can be implemented, if necessary indicating “No Loitering.” Signage, along with appropriate lighting, may also assist in reducing the incidents of vagrancy and associated noise that currently occurs, as indicated by the commenter.
December 12, 2016

Dr. Jan Green Rebstock  
City of Los Angeles  
Public Works, Bureau of Engineering  
Environmental Management Group  
1149 South Broadway Street, 8th Floor, Mail Stop 939  
Los Angeles, California 90015-2213

RE: Draft Environmental Impact Report for the Proposed Venice Auxiliary Pumping Plant Project, SCH #2015111038

Dear Dr. Rebstock:

We wish to reiterate the concerns we have expressed to you over the past fourteen months (through our letter of November 25, 2015, and various emails and telephone conversations) that both the Initial Study/Environmental Checklist and the Draft Environmental Impact Report refer to the property at 128 Hurricane Street as being owned by the City of Los Angeles.

As you know, that is completely false. The property is, in fact, owned by the McQueen-Whalen Revocable Trust. This error of fact has permeated the breadth and depth of the Draft EIR to the point that it is fundamentally flawed.

You informed us on the phone that the underlying premise of the Draft EIR assumes the City will purchase our property. We believe it is imperative that the EIR address the possibility that the property might not be acquired. A thorough re-evaluation, excluding the property at 128 Hurricane, should be conducted and presented as part of the EIR.

Sincerely,

Daniel P. Whalen, AIA  
Trustee  

Sharon McQueen  
Trustee
McQueen-Whalen Revocable Trust – GP5

Response to Comment GP5-1

Thank you for your comment. In Chapter 2 (Project Description) of the Draft EIR, it was noted that parcel located at 128 Hurricane Street (APN 4225-010-016) was privately owned, but that the City was in the process of acquiring the lot. However, in Section 4.2.3.3 (Expand Existing Venice Pumping Plant and Install Pumps and Piping Below-grade) the parcel was inadvertently noted as city-owned. Chapter 3 (Modifications to the Draft EIR) of this Final EIR includes a clarification that the parcel is not currently owned by the City.

Response to Comment GP5-2

Chapter 4 (Comparison of Alternatives) of the Draft EIR evaluated alternatives for the Proposed Project, including alternative locations and which assumed that the privately-owned parcel located at 128 Hurricane Street would not be acquired for the Proposed Project. Based upon the analysis in Chapter 4 of the Draft EIR, the Proposed Project was considered the Environmentally Superior Alternative. The Draft EIR also provided a thorough analysis of the Proposed Project’s potential impacts, including a detailed analysis of alternatives (as discussed above) and therefore, no re-analysis or supplemental analysis is required in the Final EIR.

2.4 References
