

### 3.1 Introduction

This chapter includes changes to the Draft Environmental Impact Report (Draft EIR) for the Proposed Project, as deemed necessary by the lead agency. These corrections and/or modifications to the Draft EIR are intended to provide clarity, refinements or supplemental information for the Proposed Project, based upon comments received from agencies and/or interested parties/public. None of the corrections and/or modifications to the Draft EIR constitute significant new information, changes to the analysis or conclusions originally contained in the Draft EIR and, therefore, do not require recirculation of the Draft EIR, per Section 15088.5 of the California Environmental Quality Act (CEQA) Guidelines.

These changes are hereby incorporated within the Draft EIR and constitute the entirety of the EIR.

### 3.2 Changes to the Draft EIR

Corrections or revisions are noted below by Chapter and/or Section. Revisions are noted in two formats: (1) deleted text is provided in ~~strike through~~; and (2) new texts in noted in underline.

#### Changes Made to Executive Summary

Table ES-1 (Required Permits for Venice Auxiliary Pumping Plant Project) on page ES-4 of the Draft EIR is revised to include the following new permit and/or approvals:

**Table ES-1. Required Permits for Venice Auxiliary Pumping Plant Project**

Agency	Permit/Requirement	Issue
<b>Local</b>		
City of Los Angeles Department of Public Works	Local Coastal Development Permit ( <u>CDP</u> )	Coastal access, construction within coastal zone, habitat disturbance, parking and traffic during construction. <u>Also consistency with the Venice Local Coastal Program Land Use Plan.</u>
City of Los Angeles Planning Department	Specific Plan Project Permit Compliance ( <u>SPP</u> ) ( <u>LAMC § 11.5.7</u> )	Compliance with the Venice Coastal Specific Plan. <del>Also consistency with the Venice Local Coastal Program Land Use Plan</del>
City of Los Angeles Planning Department	Public Benefits Project Permit ( <u>PUB</u> ) ( <u>LAMC § 14.A.6</u> )	Section 14 of the Los Angeles Municipal Code. Public Benefit permit with Alternative Compliance for <u>public utilities and public services uses and structures</u> <del>Public Facilities and Park/Recreation uses</del>

Agency	Permit/Requirement	Issue
City of Los Angeles Planning Department	Los Angeles Municipal Code Adjustment for Yards and Rear Fence ( <u>LAMC § 12.28</u> )	Relief for encroachment <u>and projections more than 6 feet</u> into the rear <u>and side yards to allow a side yard of 5 ½ feet in lieu of the required 8 feet (on the south side) and an 8 foot high fence.</u>
City of Los Angeles Planning Department	Conditional Use Permit for Parking ( <u>LAMC 12.24 U</u> )	<del>Relief for encroachment more than 6 feet into rear yard</del> <u>To allow a public parking lot in the RW2 (Residential Waterways) zone.</u>
Los Angeles County Department of Public Works/Department of Beaches and Harbors	Encroachment permit	Access and use of parcel for Laydown Area 2
City of Culver City, Planning Department	Temporary Use Permit	Temporary stockpile of soil (up to 7,700 cubic yards) for Laydown Area 3
<b>Regional</b>		
Los Angeles Regional Water Quality Control Board (RWQCB)	National Pollutant Discharge Elimination System (NPDES) Construction Stormwater Pollution Prevention Plan permit	Water quality and placement of discharges associated with dewatering activities; no permit required for discharges to sewer (general permit saves time with RWQCB)
RWQCB	401C section certification	State water quality certification prior to an issuance of U.S. Army Corps of Engineers (USACE) nationwide permit
South Coast Air Quality Management District	Permit to construct and operate	Air quality, additional portable generator(s), and any modifications to odor dispersion stack
<b>State</b>		
California Coastal Commission	State Coastal Development Permit	Coastal access, construction within coastal zone, habitat disturbance, parking and traffic during construction
California Department of Conservation, Division of Oil, Gas, and Geothermal Resources	A construction notification form should be submitted to the division prior to any activity	Project is within boundaries of the Playa del Rey oil field, which contains numerous plugged and abandoned oil wells
State of California Department of Health Services	Project review for compliance with Title 22, Section 64630 (conducted through County Environmental Services Division)	Separation of water and sewer mains

Agency	Permit/Requirement	Issue
California Office of Historic Preservation	Consultation	Historic status of Grand Canal
<b>Federal</b>		
USACE	Section 10 permit	Pipeline construction under navigable waters
USACE	Section 404	Could fall under Nationwide Permit NWP 12, Utility Line Activities, and require Pre-Construction Notification (PCN)
National Marine Fisheries Service	Consultation notification	Impacts on aquatic and marine life
U.S. Fish and Wildlife Service	Notification through Section 10 process	Impacts on habitat (i.e., least tern)

The following text under the heading Impacts Determined to Be Less than Significant on page ES-12 of the Draft EIR is revised as follows:

## Impacts Determined to Be Less than Significant

The analysis contained in the Draft EIR determined that the Proposed Project would result in less than significant or less than significant impacts after mitigation is implemented for the following resources:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality & Service Systems
- Land Use and Planning (~~secondary impacts related to operation only, for secondary noise, aesthetics, geology and soils and vibration impacts~~)
- Noise and Vibration (~~operation only, for noise and vibration~~) operation noise, construction vibration - potential building damage
- Transportation/Traffic
- Energy

Table ES-3 (Summary of Environmental Impacts, Mitigation Measures, and Notable BMPs) on page ES-15 of the Draft EIR is revised to include the following changes to mitigation measures under Geology and Soils (on page ES-27) and Transportation/Traffic (on page ES-46):

**Table ES-3. Summary of Environmental Impacts, Mitigation Measures and notable BMPs**

Environmental Impact	Significance Before Mitigation	Mitigation Measures	Significance after Mitigation
<b>Geology and Soils</b>			
<p><i>GEO-1. Seismic Hazards.</i>                      During construction and operation, the Project Site could be subject to significant seismic ground shaking from regional faults; however the VAPP would be designed in conformance with the City of Los Angeles Building Code, which would reduce potential ground shaking hazards. Due to presence of uncertified fill soils, seismically related ground failure, including liquefaction, could occur on the Project Site.</p>	<p>Potentially Significant</p>	<p><b>MM GEO-1: Liquefaction Considerations.</b> <u>Potential liquefaction induced settlements shall be considered and accounted for in the design of the Proposed Project. The design shall comply with the specifications in the following three reports located in Appendix M: the Department of Public Works, Bureau of Engineering, Geotechnical Division's Geotechnical Engineering Report, 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.</u></p> <p><del>Given the data presented in Section 3 of the Geotechnical Engineering Report—Venice Auxiliary Pumping Plant, December 14, 2015, and the results of the liquefaction calculations, potential liquefaction induced settlements on the order of 1.75 inches are estimated for the site. A potential liquefaction induced differential settlement of 1 inch is estimated between the proposed structures and the pipe header. These potential liquefaction induced settlements shall be considered and accounted for in the design of the Proposed Project. Mat foundations are recommended for support of the Project structures, with the understanding that the foundation would be susceptible to liquefaction induced settlements. Mat foundations for the wetwell/valve structure and diversion structures shall be founded on jet-grouted columns constructed within the natural soils. The mat foundation for the electrical building shall be founded on compacted fill soil. Mat foundations shall be designed and constructed to bear at a depth of at least 24 inches below the lowest adjacent grade. Mat foundations can be designed for an allowable bearing capacity of 1,500 pounds per square foot (psf). A coefficient of vertical subgrade reaction, for a 1-foot-square loaded area, of 100 kips per cubic foot (kef) may be used for design of the mats.</del></p>	<p>Less than Significant</p>

Environmental Impact	Significance Before Mitigation	Mitigation Measures	Significance after Mitigation
		<p>Total static settlement of the proposed foundations, designed and constructed in accordance with the recommendations presented herein, shall not exceed 1 inch. Differential static settlement shall not exceed one-half of the total settlement. Resistance to lateral loads can be provided by friction at the base of the foundation and passive earth pressure. A coefficient of friction of 0.35 may be assumed with dead load forces. An allowable passive lateral earth pressure of 250 psf per foot of depth up to a maximum of 2,500 psf may be used for sides of the foundation poured against undisturbed natural soil or properly compacted fill. The allowable passive pressure may be increased by 33% of lateral loading due to wind or seismic forces.</p>	
<p><i>TRANS-3. Result in inadequate emergency access:</i> Construction-related activities have the potential to result in temporary and periodic inadequate emergency access. Wherever possible, delivery trucks would be brought onto the Project Site and be loaded and unloaded within the perimeter fence of the construction site. The roadways surrounding the Project Site would remain accessible during operation of the Proposed Project. Operational impacts would be less than significant.</p>	<p>Potentially Significant</p>	<p><b>MM TRANS-1: Construction Worker Shuttles.</b> Construction workers would park at an off-site location and be shuttled to and from the Project Site each workday on 10 to 15-passenger shuttles or vans. While no specific off-site location has been identified at this time, it would likely lie within five miles of the Project Site. The selected contractor would be required to identify and secure a suitable location.</p> <p><b>MM TRANS-2: Coordination with Emergency Service Providers.</b> Coordinate with emergency service providers (police, fire, ambulance and paramedic services) to provide advance notice of any lane closures, construction hours and changes to local access and to identify alternative routes where appropriate.</p> <p><b><u>MM-TRANS-3: Transport of Heavy Construction Equipment and/or Materials.</u></b> <u>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.).</u></p>	<p>Less than Significant</p>

## Changes Made to Chapter 2 (Project Description)

The following text under Section 2.8.3 (Parking) on page 2-7 of the Draft EIR is revised as follows:

Parking for the Proposed Project would be provided on the 128 Hurricane Street lot. There would be a total of eight parking spaces. Per the Venice Specific Plan and the Venice Local Coastal Program Land Use Plan, the Proposed Project would require at least five project-dedicated parking spaces, ~~four~~ three are required for the project, and ~~one~~ two for Beach Impact Zone parking. ~~Five~~ Existing on-street parking spaces along Hurricane Street on the south side of the new VAPP lot ~~would~~ will be removed and replaced on the 128 Hurricane Street lot to be consistent with the California Coastal Act; three will be relocated in the 128 Hurricane Street lot and the remaining made available in accordance with the requirements of the City of Los Angeles Department of City Planning, Department of Transportation and the California Coastal Commission in the project vicinity.

The following text under Section 2.8.10 (On- and Off-site Circulation, Parking, and Pedestrian Access) on page 2-9 of the Draft EIR is revised as follows:

Pacific Avenue, Hurricane Street, Via Dolce, and Marquesas Way will provide access to the Project Site, including construction Laydown Areas. Hurricane Street between Canal Court and Esplanade would be closed to public traffic during construction; however, these roadways would remain accessible during operation of the Proposed Project and preserve Coastal Access (see Figure 2-2, Project Location Map). ~~Five on-street parking spaces~~ Parking on Hurricane Street would be ~~eliminated-removed; permanently~~ but three will be relocated to the 128 Hurricane Street lot and the remaining made available in the Project vicinity in accordance with the requirements of the City of Los Angeles Department of City Planning, Department of Transportation and the California Coastal Commission. A total of eight parking spaces would be provided on the 128 Hurricane Street lot for employees and deliveries/visitors (~~five~~ three spaces), Beach Impact Zone Parking (two spaces) and relocation of existing on-street parking spaces ~~at the terminus of~~ from Hurricane Street (three spaces).

Table 2-1 (Required Permits for Venice Auxiliary Pumping Plant Project) in Section 2.10 (Responsible Agencies and Project Approvals) on page 2-13 of the Draft EIR is revised to include the following new permit and/or approvals:

**Table 2-1. Required Permits for Venice Auxiliary Pumping Plant Project**

Agency	Permit/Requirement	Issue
<b>Local</b>		
City of Los Angeles Department of Public Works	Local Coastal Development Permit ( <u>CDP</u> )	Coastal access, construction within coastal zone, habitat disturbance, parking and traffic during construction. <u>Also consistency with the Venice Local Coastal Program Land Use Plan.</u>
City of Los Angeles Planning Department	Specific Plan Project Permit Compliance ( <u>SPP</u> ) ( <u>LAMC § 11.5.7</u> )	Compliance with the Venice Coastal Specific Plan. <u>Also consistency with the Venice Local Coastal Program Land Use Plan</u>

Agency	Permit/Requirement	Issue
City of Los Angeles Planning Department	Public Benefits Project Permit (PUB) (LAMC § 14.A.6)	Section 14 of the Los Angeles Municipal Code. Public Benefit permit with Alternative Compliance for <u>public utilities and public services uses and structures Public Facilities and Park/Recreation uses</u>
City of Los Angeles Planning Department	Los Angeles Municipal Code Adjustment for Yards and Rear Fence (LAMC § 12.28)	Relief for encroachment <u>and projections more than 6 feet</u> into the rear <u>and side yards to allow a side yard of 5 ½ feet in lieu of the required 8 feet (on the south side) and an 8 foot high fence.</u>
City of Los Angeles Planning Department	Conditional Use Permit for Parking (LAMC 12.24 U)	<del>Relief for encroachment more than 6 feet into rear yard</del> <u>To allow a public parking lot in the RW zone.</u>
Los Angeles County Department of Public Works/Department of Beaches and Harbors	Encroachment permit	Access and use of parcel for Laydown Area 2
City of Culver City, Planning Department	Temporary Use Permit	Temporary stockpile of soil (up to 7,700 cubic yards) for Laydown Area 3
<b>Regional</b>		
Los Angeles Regional Water Quality Control Board (RWQCB)	National Pollutant Discharge Elimination System (NPDES) Construction Stormwater Pollution Prevention Plan permit	Water quality and placement of discharges associated with dewatering activities; no permit required for discharges to sewer (general permit saves time with RWQCB)
RWQCB	401C section certification	State water quality certification prior to an issuance of U.S. Army Corps of Engineers (USACE) nationwide permit
South Coast Air Quality Management District	Permit to construct and operate	Air quality, additional portable generator(s), and any modifications to odor dispersion stack
<b>State</b>		
California Coastal Commission	State Coastal Development Permit	Coastal access, construction within coastal zone, habitat disturbance, parking and traffic during construction
California Department of Conservation, Division of Oil, Gas, and Geothermal Resources	A construction notification form should be submitted to the division prior to any activity	Project is within boundaries of the Playa del Rey oil field, which contains numerous plugged and abandoned oil wells

Agency	Permit/Requirement	Issue
State of California Department of Health Services	Project review for compliance with Title 22, Section 64630 (conducted through County Environmental Services Division)	Separation of water and sewer mains
California Office of Historic Preservation	Consultation	Historic status of Grand Canal
<b>Federal</b>		
USACE	Section 10 permit	Pipeline construction under navigable waters
USACE	Section 404	Could fall under Nationwide Permit NWP 12, Utility Line Activities, and require Pre-Construction Notification (PCN)
National Marine Fisheries Service	Consultation notification	Impacts on aquatic and marine life
U.S. Fish and Wildlife Service	Notification through Section 10 process	Impacts on habitat (i.e., least tern)

## Changes Made to Section 3.5 (Geology and Soils)

The following text and mitigation measure under Section 3.5.4 (Mitigation Measures) on pages 3.5-9 and 3.5-10 of the Draft EIR is revised as follows:

The following mitigation measure was developed to avoid or minimize potential impacts ~~on~~ of the proposed Project related to geology and soils. It should be noted that there are also specific recommendations contained in the *Geotechnical Engineering Report – Venice Auxiliary Pumping Plant*, December 14, 2015 (see Appendix G of ~~this the Draft EIR~~), and *Phase I Environmental Site Assessment (128 Hurricane Street)*, May 2016 (see Appendix K of ~~this the Draft EIR~~), and the Department of Public Works, Bureau of Engineering, Geotechnical Division’s Geotechnical Engineering Report, 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 three reports).

### **MM GEO-1: Liquefaction Considerations.**

Potential liquefaction induced settlements shall be considered and accounted for in the design of the Proposed Project. The design shall comply with the specifications in the following three reports located in Appendix M: the Department of Public Works, Bureau of Engineering, Geotechnical Division’s Geotechnical Engineering Report, 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.

~~Given the data presented in Section 3 of the Geotechnical Engineering Report – Venice Auxiliary Pumping Plant, December 14, 2015, and the results of the liquefaction calculations, potential liquefaction induced settlements on the order of 1.75 inches are estimated for the site. A~~

~~potential liquefaction induced differential settlement of 1 inch is estimated between the proposed structures and the pipe header. These potential liquefaction induced settlements shall be considered and accounted for in the design of the Proposed Project.~~

~~Mat foundations are recommended for support of the project structures, with the understanding that the foundation would be susceptible to liquefaction induced settlements. Mat foundations for the wetwell/valve structure and diversion structures shall be founded on jet-grouted columns constructed within the natural soils. The mat foundation for the electrical building shall be founded on compacted fill soil. Mat foundations shall be designed and constructed to bear at a depth of at least 24 inches below the lowest adjacent grade. Mat foundations can be designed for an allowable bearing capacity of 1,500 pounds per square foot (psf). A coefficient of vertical subgrade reaction, for a 1-foot square loaded area, of 100 kips per cubic foot (kcf) may be used for design of the mats.~~

~~Total static settlement of the proposed foundations, designed and constructed in accordance with the recommendations presented herein, shall not exceed 1 inch. Differential static settlement shall not exceed one-half of the total settlement.~~

~~Resistance to lateral loads can be provided by friction at the base of the foundation and passive earth pressure. A coefficient of friction of 0.35 may be assumed with dead load forces. An allowable passive lateral earth pressure of 250 psf per foot of depth up to a maximum of 2,500 psf may be used for sides of the foundation poured against undisturbed natural soil or properly compacted fill. The allowable passive pressure may be increased by 33% of lateral loading due to wind or seismic forces.~~

## Changes Made to Section 3.8 (Land Use and Planning)

Table 3.8-2 (Proposed Project Consistency with Applicable Plans and Goals, Objectives, and Policies) in Section 3.8.2.2 (Applicable Goals, Objectives, and Policies) on page 3.8-20 of the Draft EIR is revised as follows:

**Table 3.8-2. Proposed Project Consistency with Applicable Plans and Goals, Objectives, and Policies**

Plan Goal, Policy Or Objective Number	Applicable Goal, Policy, or Objective	Conflict with Applicable Plan, Policy, or Regulation?
<b>Venice Local Coastal Program</b>		
<p><b>Policy II.A.3. Parking Requirements.</b></p>	<p>Public Utility Facility not having a Business Office on the premises:                  2 spaces; plus 1 space for each 500 square feet of floor area.                   Parking shall be provided pursuant to a detailed parking study that demonstrates that the project will provide adequate parking to meet the needs of the development without causing negative impacts to coastal access or access to public recreational facilities.</p>	<p>No. The Proposed Project includes a total of eight parking spaces, five for on-site parking and three relocated off-site parking spaces. The Proposed Project requires a total of five on-site parking spaces. A total of <del>four</del> <u>three</u> spaces are required to comply with the Venice Specific Plan <u>for the Project</u> and <del>one</del> <u>two</u> parking spaces <u>is are</u> required to comply with Beach Impact Zone Parking requirements. These spaces are allowed off-site, located within 750 feet of the property per LAMC 12.21 A.4 (g) and would be located on 128 Hurricane Street with a recorded covenant. Since the proposed parking area is R-zoned, a Conditional Use for Parking (LAMC 12.24U) would be required to allow a parking lot on the R-zoned lot. <u>Also since the Five on-street parking would be removed and replaced with a red curb and/or a driveway along the southerly boundary of the Proposed Project along Hurricane Street. Three spaces will be relocated on the 128 Hurricane Street lot and the remaining made available in the Project vicinity in accordance with the requirements of the City of Los Angeles Department of City Planning, Department of Transportation and the California Coastal Commission. It is possible that not all of the removed on-street parking will be replaced on a 1:1 ratio. According to the Project's Parking Assessment Draft Memorandum, even if parking is not replaced on a 1:1 ratio, it will not cause an impact to Coastal parking since there is adequate parking in the Project vicinity three spaces would be relocated on the 128 Hurricane Street lot.</u> It should be noted that the Draft EIR determined that impacts associated with parking during operation of the Proposed Project would be less than significant and therefore, no mitigation measures are required.</p>

Plan Goal, Policy Or Objective Number	Applicable Goal, Policy, or Objective	Conflict with Applicable Plan, Policy, or Regulation?
<b>Venice Community Plan</b>		
<b>Goal 13</b>	A sufficient system of well designed and convenient on-street parking and off-street parking facilities throughout the plan area.	No. The Proposed Project will provide a total of eight parking spaces at the 128 Hurricane Street lot. A total of <del>three</del> <del>four</del> parking spaces would be provided to serve employees, <del>two</del> <del>one</del> space for the Beach Impact Zone parking requirement, and relocated parking spaces, which would be removed from the southerly boundary of the Proposed Project along Hurricane Street between Canal Court and Esplanade <del>with three</del> <del>and</del> relocated to 128 Hurricane Street <u>and the remaining made available in the Project vicinity in accordance with the requirements of the City of Los Angeles Department of City Planning, Department of Transportation and the California Coastal Commission. It is possible that not all of the removed on-street parking will be replaced on a 1:1 ratio. According to the Project's Parking Assessment Draft Memorandum, even if parking is not replaced on a 1:1 ratio, it will not cause an impact to Coastal parking since there is adequate parking in the Project vicinity.</u> Two existing non-public off-street parking spaces at the VPP would be maintained inside the existing VPP. The analysis contained in the Draft EIR determined that impacts related to the relocation of existing public parking spaces at the eastern terminus of Hurricane Street would result in less-than-significant parking impacts and no mitigation measures would be necessary.

The following text under Section 3.8.3.4 (Construction Impacts) on page 3.8-44 of the Draft EIR is revised as follows:

The Venice Coastal Specific Plan establishes the amount of required parking for the Proposed Project and the California Coastal Act protects coastal on-street parking. A total of eight parking spaces will be provided at the 128 Hurricane Street lot. Five parking spaces are required for the Proposed Project that would be located on the 128 Hurricane lot, within 750 feet of the Project Site. A Conditional Use Permit for Parking on this lot would be pursued in order for the parking requirements to be consistent with the Venice Specific Plan. There are five on-street parking spaces that will be removed from Hurricane Street east of Canal Court. It is possible that not all of these five removed on-street parking spaces will be replaced on a 1:1 ratio. Three on-street parking spaces located on Hurricane Street west of Canal Court are proposed to will be relocated on the 128 Hurricane Street lot and the remaining made available in the Project vicinity in accordance with the requirements of the City of Los Angeles Department of City Planning, Department of Transportation and the California Coastal Commission. As previously stated, according to the Project's *Parking Assessment Draft Memorandum*, even if parking is not replaced on a 1:1 ratio, it will not cause an impact to Coastal parking since there is adequate parking in the Project vicinity. Therefore, a total of eight parking spaces will be provided at the 128 Hurricane Street lot. Issuance of a Conditional Use Permit and a Coastal Development Permit would ensure that the Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project, adopted for the purpose of avoiding or mitigating an environmental effect and therefore, impacts would be **less than significant** and no mitigation is required.

The following text under Section 3.8.3.4 (Operational Impacts) on page 3.8-47 of the Draft EIR is revised as follows:

The curb along Hurricane Street, adjacent to the new VAPP site, would be changed to red and/or a driveway resulting in the removal of five on-street parking spaces. It is possible that not all of the removed on-street parking will be replaced on a 1:1 ratio. Three of the ~~The~~ current on-street parking spaces ~~would~~ will be relocated to the 128 Hurricane Street lot and the remaining made available in the Project vicinity in accordance with the requirements of the City of Los Angeles Department of City Planning, Department of Transportation and the California Coastal Commission. However, according to the Project's *Parking Assessment Draft Memorandum*, even if parking is not replaced on a 1:1 ratio, it will not cause an impact to Coastal parking since there is adequate parking in the Project vicinity. Because the VPP and VAPP are considered critical facilities, access would need to be controlled at all times. As discussed in Chapter 2 (Project Description), this would be achieved via security cameras, lighting, and perimeter fencing. Project parking for the VAPP would be located at the 128 Hurricane Street, just west of the existing VPP site. Therefore, the Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect and therefore, impacts would be **less than significant**.

## Changes Made to Section 3.10 (Transportation/Traffic)

The following text in Section 3.10.3.2 (Screening Analysis) on pages 3.10-15 and 3.10-16 of the Draft EIR is revised as follows:

Once construction begins, Hurricane Street will be ~~permanently~~ closed to traffic between Esplanade and Canal Court. This will result in the ~~loss~~ removal of five on-street parking spaces. Additionally, the segment of Canal Court adjacent to the project site will be temporarily closed during the construction period; however, parking is prohibited there. Once the Project is operational, the five on-street parking spaces on Hurricane Street will be removed with a red curb and/or a driveway along the southerly boundary of the Proposed Project along Hurricane Street.

The Venice Pumping Plant currently requires two employees per 8-hour shift (three shifts over a 24-hour period) and two parking spaces are located within the VPP site. Once VAPP becomes operational, this staffing level will remain unchanged. Thus VAPP/VPP would require up to four parking spaces at the peak time, when shift changes occur. Per the Venice Specific Plan and the Venice Local Coastal Program Land Use Plan, the project must also provide ~~one~~ two spaces for Beach Impact Zone parking. ~~The proposed project will construct eight off-street parking spaces at 128 Hurricane Street, which will fully satisfy the need for replacement parking (five spaces), employee parking (four spaces including the existing two off-street employee spaces within the VPP), and the one new space required as Beach Impact Zone parking. The Proposed Project will construct eight off-street parking spaces at 128 Hurricane Street; three spaces would be provided to address the loss of three (of five) on-street spaces along Hurricane Street; three spaces would be provided to address employee, delivery and visitor-serving parking, in compliance with the Venice Specific Plan and Venice Local Coastal Program Land Use Plan; and two spaces would be provided to address the Beach Impact Zone parking requirements. The remaining removed Hurricane Street spaces will be made available in the Project vicinity in accordance with the requirements of the City of Los Angeles Department of City Planning, Department of Transportation and the California Coastal Commission. It should also be noted that according to the Project's *Parking Assessment Draft Memorandum* (see Appendix J of the Draft EIR) there is adequate parking in the Project vicinity to accommodate the permanent loss of these two on-street spaces along Hurricane Street, should they not be replaced on a 1:1 ratio in the project vicinity. During the 2-year construction period of the VAPP, the loss of the five on-street existing parking spaces from Hurricane Street between Canal Court and the Grand Canal would temporarily reduce the parking supply in the project vicinity. This will affect the convenience of drivers seeking to park, by reducing the total supply of on-street parking in the neighborhood around the VAPP site, although the total on-street parking in the vicinity could still accommodate these vehicles. Once the Proposed Project is operational, of the five spaces removed from Hurricane Street, three spaces would be relocated to the 128 Hurricane Street lot and the remaining made available in the Project vicinity in accordance with the requirements of the City of Los Angeles Department of City Planning, Department of Transportation and the California Coastal Commission. It is possible that not all removed on-street parking spaces will be replaced on a 1:1 ratio. According to the Project's *Parking Assessment Draft Memorandum* (see Appendix J of the Draft EIR), even if parking is not replaced on a 1:1 ratio, it will not cause an impact to coastal parking since there is adequate parking in the Project vicinity.~~

The Parking Assessment Draft Memorandum concluded the existing available parking supply near the Project Site is sufficient under normal circumstances to accommodate the parking spaces that would be temporarily displaced during construction of by the Proposed Project. In addition, within approximately 1,000 feet of the Project Site, at least 70 spaces were available during the weekday peak period and at least 11 spaces were available during the busier weekend peak period. It is recognized, however, that during peak times on peak summer weekend days and weekdays and holidays, parking utilization is higher than what was observed on the survey dates. On those days, the temporary loss displacement of these on-street spaces would be expected to result in an increase in vehicles circling through the neighborhood as they seek available parking. However, under normal operating conditions, this impact is less than significant.

With implementation of the proposed parking spaces, the Project's parking supply would comply with City codes, plans, and ordinances. While the Project is located within the coastal one, the project's proposed parking supply would meet California Coastal Commission requirements. Upon project completion, the on-street parking on Hurricane Street east of Canal Court would be fully replaced off-street at 128 Hurricane Street. In addition, the proposed VAPP project, together with the existing VPP facility, would provide four employee parking spaces, sufficient to accommodate its needs, as well as one additional space as required for Beach Impact Zone parking. Thus, upon completion the project would result in one additional parking space in the project vicinity. As such, no significant project impacts to parking would occur and no further analysis required.

The following text in Section 3.10.3.3 (Thresholds of Significance) on pages 3.10-17 and 3.10-18 of the Draft EIR is revised as follows:

**TRANS-4. L.8. To allow for discussion of this threshold in both construction and operational phases of the project, it has been modified to discuss both temporary and permanent potential impacts.**

~~In-Street Construction~~ Impacts: The determination of significance shall be made on a case-by-case basis, considering the following factors:

- ~~Temporary~~ Traffic Impacts:
  - The length of time of temporary street closures or closures of two or more traffic lanes;
  - The classification of the street (major arterial, state highway) affected;
  - The existing traffic levels and level of service (LOS) on the affected street segments and intersections;
  - Whether the affected street directly leads to a freeway on- or off-ramp or other state highway;
  - Potential safety issues involved with street or lane closures; and
  - The presence of emergency services (fire, hospital, etc.) located nearby that regularly use the affected street.
- ~~Temporary~~ Loss of Access:
  - The length of time of any loss of vehicular or pedestrian access to a parcel fronting the construction area;

- The availability of alternative vehicular or pedestrian access within ¼ mile of the lost access; and
- The type of land uses affected, and related safety, convenience, and/or economic issues.
- ~~Temporary~~ Loss of Bus Stops or Rerouting of Bus Lines:
  - The length of time that an existing bus stop would be unavailable or that existing service would be interrupted;
  - The availability of a nearby location (within ¼ mile) to which the bus stop or route can be temporarily relocated;
  - The existence of other bus stops or routes with similar routes/destinations within a ¼ mile radius of the affected stops or routes; and
  - Whether the interruption would occur on a weekday, weekend or holiday, and whether the existing bus route typically provides service that/those day(s).
- ~~Temporary~~ Loss of On-Street Parking:
  - The current utilization of existing on-street parking;
  - The availability of alternative parking locations or public transit options (e.g. bus, train) within ¼ mile of the Project Site; and
  - The length of time that existing parking spaces would be unavailable.

The following text in Section 3.10.3.4 (Construction Impacts) on page 3.10-20 of the Draft EIR is revised as follows:

The added traffic would be most apparent on the local roadways serving the site, but as described above, this would be short-term in nature and the vehicle the trips would be distributed throughout the day (not all 58 vehicle trips would occur during the AM or PM peak hours). In addition, temporary street closures along Canal Court and Hurricane Street (see Chapter 2, Project Description) would not result in adverse traffic impacts on surrounding neighbors since alternate access would be available. Therefore, the Proposed Project would not exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit, and impacts would be **less than significant**; no mitigation measures are required. Transport of heavy construction equipment and materials associated with the Proposed Project that may need to occur along State Route 1 (Lincoln Boulevard), a Caltrans facility, will require a Caltrans transportation permit. Any large size truck trips (as defined by Caltrans), will be limited to off-peak commute hours. While impacts would be less than significant, Mitigation Measure MM TRANS-3 would be included to address heavy construction equipment and materials transport to the project site.

The following text in Section 3.10.3.4 (Construction Impacts) on pages 3.10-21 and 3.10-22 of the Draft EIR is revised as follows:

#### **TRANS-4. L.8. Result in In-Street Construction Impacts**

According to the *L.A. CEQA Thresholds Guide*, the determination of significance related to ~~in-street construction~~ this threshold shall be made on a case-by-case basis, considering several factors. These are each discussed below.

#### **Temporary Traffic Impacts**

The City of Los Angeles has established threshold criteria to determine significant traffic impacts of a Proposed Project in its jurisdiction. Although the methodologies and the criteria to calculate volume-to-capacity (V/C) ratios for intersections are intended by LADOT to identify potential traffic impacts during operation, they can also be applied to construction periods.

Under the City of Los Angeles guidelines, a project would be considered to significantly affect a local residential street if the projected increase in daily traffic volumes is as follows:

<b>Projected Average Daily Traffic (ADT) with Project (Final ADT)</b>	<b>Project-Related Increase in ADT</b>
0 to 999	120 or more
1,000 to 1,999	12% or more of final ADT
2,000 to 2,999	10% or more of final ADT
3,000 or more	8% or more of final ADT

Source: Fehr & Peers 2016.

Based on these guidelines, VAPP construction activity would not result in any significant traffic impacts on study area streets because the maximum number of daily project trips is estimated to be 58 one-way trips (or 108 PCEs), which is below the minimum threshold volume considered significant. Therefore, the Proposed Project's in-street construction impacts related to temporary traffic impacts would be **less than significant**, and no mitigation measures are required.

#### **Temporary Loss of Access**

The entire Project Site would be fenced and Hurricane Street, between Canal Court and the Esplanade, would be closed to the public. During Stage 1 of construction, a portion of Hurricane Street and Canal Court would be temporarily closed and pedestrian access to the Grand Canal from Hurricane Street would be eliminated; pedestrians would be diverted to Galleon Street one block to the north or would be able to utilize Canal Court extending south to the Esplanade. Hurricane Street and Esplanade would be re-opened to pedestrian access on the west side of the Grand Canal following completion of Stage 6 of construction. Therefore, the Proposed Project would result in temporary loss of access impacts that would be **less than significant**; no mitigation measures are required.

#### **Temporary Loss of Bus Stops or Rerouting of Bus Lines**

The nearest bus stop to the Project Site is located at the corner of Pacific Avenue and Hurricane Street, approximately 0.7 mile to the west. Construction activities would not result in disruption to the existing bus stop or bus service, as no improvements would occur within the vicinity of the bus stop. Additionally, access to this bus stop would remain unchanged throughout project construction. Therefore, ~~the Proposed Project would not result in in-street construction impacts~~ in-street construction impacts related to temporary loss of bus stops or rerouting of bus lines would be less than significant; no mitigation measures are required.

## Temporary Loss of On-Street Parking

As noted in the Parking Assessment Memorandum (Fehr & Peers 2016), within a study radius of 0.3 mile, there are an estimated 763 publicly available parking spaces, including 399 publicly available on-street spaces and 364 spaces at the public parking lot. This also includes 8 time-restricted parking spaces and 391 unrestricted parking spaces. During construction, a portion of Hurricane Street and Canal Court would be temporarily closed and parking spaces on Hurricane Street between Canal Court and the Esplanade would be unavailable. The loss of these spaces represents 0.65% of the total parking supply in the area.

Hurricane Street, where the Project Site is located, contains restricted on-street parking and parking is prohibited on Canal Court. There are approximately 19 parking spaces along Hurricane Street between Canal Court and Pacific Avenue. On weekend peak hours, parking on Hurricane Street is highly utilized and is greater than 85 percent. On weekday peak hours, parking on Hurricane Street is also highly utilized and is greater than 85 percent on the south side of the street but has a lower utilization less than 50 percent on the north side of the street. During construction, the loss of these on-street parking spaces would be expected to result in an increase in vehicles circling through the neighborhood as they seek available parking close to their residence. This impact could be adverse during peak hours, but ~~is not considered to be significant because of the temporary nature of the construction activities.~~ ~~In addition,~~ it is not considered significant because, within approximately 1,000 feet of the Project Site, at least 70 spaces are available during the weekday peak period and at least 11 spaces are available during the busier weekend peak period. It is noted however, that during peak times on peak summer weekend days and weekdays and holidays, it is recognized that parking utilization is higher than what was observed on the survey dates. On those days, the loss of these on-street spaces would be expected to result in a further increase in vehicles circling through the neighborhood as they seek available parking close to their destinations.

Because there is adequate supply during normal peak periods (the loss of these spaces represents less than 1% of the total parking within a 0.3-mile radius) ~~and the loss of parking would be a temporary impact that would occur only during construction, as~~ and parking spaces would be provided at the 128 Hurricane Street lot upon completion of the Proposed Project and will also be made available in the Project vicinity in accordance with the requirements of the City of Los Angeles Department of City Planning, Department of Transportation and the California Coastal Commission, ~~the Proposed Project would not result in significant in-street construction impacts~~ related to loss of on-street parking would be less than significant, and no mitigation measures are required.

The following text in Section 3.10.3.5 (Operational Impacts) on page 3.10-23 of the Draft EIR is revised as follows:

**TRANS-1. Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit**

The Proposed Project would require a total of six full-time employees, with two employees per shift working three consecutive eight-hour shifts. It is assumed that these employees would generally arrive two at a time to the job site via their personal automobiles and park at the 128

Hurricane Street lot. These ~~existing~~ ~~addition of these~~ ~~new~~ one-way operation-related trips to the circulation and/or intersection or highway/freeway network would not generate ~~any new~~ levels that would exceed the capacity of these systems. Similarly, these trips would not exceed the capacity of the existing mass transit, pedestrian, or bicycle path system since adequate capacity currently exists and they would not generate sufficient trips to overwhelm these systems.

The following text in Section 3.10.3.5 (Operational Impacts) on page 3.10-24 of the Draft EIR is revised as follows:

#### **TRANS-4. L.8. In-Street ~~Construction~~ Impacts**

~~This threshold relates to construction impacts and does not apply to operational impacts. No further analysis is required.~~

According to the *L.A. CEQA Thresholds Guide*, the determination of significance related to this threshold shall be made on a case-by-case basis, considering several factors. These are each discussed below.

#### **Traffic Impacts**

Once VAPP becomes operational, no new trips will be added as a result of the Project. The VAPP will continue to require two operations employees at the site at any given time, and there would be three shifts per day. As such, the site is estimated to continue to generate twelve 1-way trips per day. Therefore, the Proposed Project's in-street impacts related to operations traffic would be **less than significant**, and no mitigation measures are required.

#### **Loss of Access**

The Proposed Project will provide additional pedestrian access. The 128 Hurricane Street lot will be designed with a path that provides additional pedestrian access to the Coastal Trail along the Ballona Lagoon. Upon completion of the project, public access to the Esplanade will be restored around the existing Venice Pumping Plant to the Coastal Trail and Hurricane Street will be reopened for pedestrian and vehicular access. Thus, the Proposed Project would result in **no impacts** to public access.

#### **Loss of Bus Stops or Rerouting of Bus Lines**

Operation of the Proposed Project would not result in the loss or relocation of an existing bus stop that serves the project site nor in the rerouting of bus lines; **no impacts** would occur.

#### **Loss of On-Street Parking**

The Proposed Project will construct eight off-street parking spaces at 128 Hurricane Street; three spaces would be provided to address the loss of three (of five) on-street spaces along Hurricane Street; three spaces would be provided to address employee, delivery and visitor-serving parking, in compliance with the Venice Specific Plan and Venice Local Coastal Program Land Use Plan; and two spaces would be provided to address the Beach Impact Zone parking requirements. The remaining removed Hurricane Street spaces will be made available in the Project vicinity in accordance with the requirements of the City of Los Angeles Department of City Planning, Department of Transportation and the California Coastal Commission. It should also be noted that according to the Project's *Parking Assessment Draft Memorandum* (see Appendix J of the Draft EIR) there is adequate parking in the Project vicinity to accommodate the

permanent loss of these two on-street spaces along Hurricane Street, should they not be replaced on a 1:1 ratio in the project vicinity. As such, impacts related to the loss of on-street parking would be **less than significant**; no mitigation measures are required.

The following new mitigation measure within Section 3.10.4 (Mitigation Measures) is hereby added to the EIR:

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

Provided heavy construction 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.).

This new measure will also be incorporated into the Proposed Project's Mitigation Monitoring and Reporting Program (contained under separate cover).

## **Changes Made to Chapter 4 (Comparison of Alternatives)**

The following text in Section 4.2.3.3 (Expand Existing Venice Pumping Plant and Install Pumps and Piping Below-grade) is revised as follows:

Since the Venice Manifold Project is located within Hurricane Street and the Grand Canal and Ballona Lagoon are located to the east and south, respectively, expansion would be limited to the west within Canal Court and the adjacent vacant ~~City privately~~ owned parcel at 128 Hurricane Street, currently under acquisition by the City.

## **Changes Made to Draft EIR Appendices**

The following new appendices are included in the Final EIR:

Appendix L (Public Hearing Transcript)

This new appendix contains the transcript from the Public Hearing held on November 17, 2016, at the Venice Foursquare Church.

Appendix M (Updated Geotechnical Report for the Venice Auxiliary Pumping Plant)

This new appendix contains the updated geotechnical report and design specifications for the Venice Auxiliary Pumping Plant.

