

APPENDIX G
Traffic Model Output

INTERSECTION
LEVEL OF SERVICE
CALCULATION SHEETS

ICU CALCULATION

N/S Street: Woodruff Avenue
E/W Street: Stewart & Gray Road

PM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa-city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	120	0.075	132	0.082	142	0.089
NBT	2	3200	620	0.244*	682	0.268*	708	0.288*
NBR	s	s	160	s	176	s	215	s
SBL	1	1600	60	0.037*	66	0.041*	66	0.041*
SBT	2	3200	580	0.181	638	0.199	645	0.202
SBR	1	1600	40	0.025	44	0.028	68	0.042
EBL	1	1600	60	0.038	66	0.041	119	0.074
EBT	2	3200	620	0.194*	682	0.213*	948	0.296*
EBR	1	1600	120	0.075	132	0.082	143	0.089
WBL	1	1600	100	0.062*	110	0.069*	121	0.076*
WBT	2	3200	360	0.119	396	0.131	500	0.163
WBR	s	s	20	s	22	s	22	s
Sum of Critical Movements				0.537		0.591		0.701
Clearance				0.100		0.100		0.100
Total ICU				0.637		0.691		0.801
Level of Service				B		B		D

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Woodruff Avenue (East)
E/W Street: Imperial Highway

PM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	100	0.062	110	0.069	135	0.084*
NBT	2	3200	730	0.228*	803	0.251*	826	0.258
NBR	1	1600	120	0.075	132	0.082	132	0.082
SBL	1	1600	80	0.050*	88	0.055*	88	0.055
SBT	2	3200	660	0.206	726	0.227	769	0.240*
SBR	1	1600	110	0.069	121	0.069	121	0.069
EBL	1	1600	100	0.062	110	0.069	110	0.069
EBT	3	4800	1430	0.315*	1573	0.346*	1826	0.412*
EBR	s	s	80	s	88	s	151	s
WBL	1	1600	80	0.050*	88	0.055*	88	0.055*
WBT	3	4800	830	0.188	913	0.206	1013	0.227
WBR	s	s	70	s	77	s	77	s
Sum of Critical Movements				0.643		0.707		0.791
Clearance				0.100		0.100		0.100
Total ICU				0.743		0.807		0.891
Level of Service				C		D		D

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Lakewood Blvd.
E/W Street: Firestone Blvd.

AM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	290	0.181*	319	0.199*	354	0.221*
NBT	2	3200	1320	0.412	1452	0.454	1488	0.465
NBR	1	1600	220	0.138	242	0.151	242	0.151
SBL	1	1600	170	0.106	187	0.117	187	0.117
SBT	2	3200	1020	0.369*	1122	0.406*	1258	0.448*
SBR	s	s	160	s	176	s	176	s
EBL	1	1600	190	0.119*	209	0.131*	209	0.131*
EBT	3	4800	990	0.244	1089	0.268	1089	0.297
EBR	s	s	180	s	198	s	335	s
WBL	1	1600	130	0.081	143	0.089	143	0.089
WBT	3	4800	1350	0.281*	1485	0.309*	1485	0.309*
WBR	1	1600	320	0.200	352	0.220	352	0.220
Sum of Critical Movements				0.950		1.045		1.109
Clearance				0.100		0.100		0.100
Total ICU				1.050		1.145		1.209
Level of Service				F		F		F

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Lakewood Blvd.
E/W Street: Bellflower Blvd.

AM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	10	0.006	11	0.007	11	0.007
NBT	2	3200	1290	0.406*	1419	0.447*	1441	0.454*
NBR	s	s	10	s	11	s	11	s
SBL	1	1600	430	0.269*	473	0.296*	659	0.412*
SBT	3	4800	920	0.194	1012	0.213	1099	0.231
SBR	s	s	10	s	11	s	11	s
EBL	0	0	0	0	0	0	0	0
EBT	1	1600	10	0.038*	11	0.041*	11	0.041*
EBR	s	s	50	s	55	s	55	s
WBL	s	s	10	0.006*	11	0.007*	11	0.007*
WBT	1	1600	20	0.019	22	0.021	22	0.021
WBR	2	3200	560	0.175	616	0.192	665	0.208
Sum of Critical Movements				0.719		0.791		0.914
Clearance				0.100		0.100		0.100
Total ICU				0.819		0.891		1.014
Level of Service				D		D		F

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Lakewood Blvd.
E/W Street: Stewart & Gray Road

AM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	210	0.131*	231	0.144*	259	0.162*
NBT	2	3200	1170	0.375	1287	0.412	1306	0.418
NBR	s	s	30	s	33	s	33	s
SBL	1	1600	70	0.044	77	0.048	81	0.050
SBT	2	3200	860	0.297*	946	0.327*	1029	0.352*
SBR	s	s	90	s	99	s	99	s
EBL	1	1600	130	0.081	143	0.089	143	0.089
EBT	2	3200	840	0.294*	924	0.323*	1047	0.408*
EBR	s	s	100	s	110	s	260	s
WBL	1	1600	80	0.050*	88	0.055*	88	0.055*
WBT	2	3200	640	0.200	704	0.220	747	0.233
WBR	1	1600	70	0.044	77	0.048	80	0.050
Sum of Critical Movements				0.772		0.849		0.977
Clearance				0.100		0.100		0.100
Total ICU				0.872		0.949		1.077
Level of Service				D		E		F

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Lakewood Blvd.
E/W Street: Alameda Street

AM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa-city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	30	0.019	33	0.021	48	0.030
NBT	2	3200	1320	0.413*	1452	0.454*	1550	0.484*
NBR	0	0	0	0	0	0	0	0
SBL	0	0	0	0	0	0	0	0
SBT	2	3200	1040	0.328	1144	0.361	1405	0.443
SBR	s	s	10	s	11	s	14	s
EBL	1	1600	80	0.050	88	0.055	92	0.058
EBT	0	0	0	0	0	0	0	0
EBR	1	1600	120	0.075*	132	0.082*	196	0.122*
WBL	0	0	0	0	0	0	0	0
WBT	0	0	0	0	0	0	0	0
WBR	0	0	0	0	0	0	0	0
Sum of Critical Movements				0.488		0.536		0.606
Clearance				0.100		0.100		0.100
Total ICU				0.588		0.636		0.706
Level of Service				A		B		C

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Lakewood Blvd.
E/W Street: Clark Avenue

AM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move- ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	0	0	0	0	0	0	0	0
NBT	2	3200	910	0.291*	1001	0.320*	1274	0.405*
NBR	s	s	20	s	22	s	22	s
SBL	1	1600	280	0.175*	308	0.192*	368	0.230*
SBT	2	3200	900	0.281	990	0.309	1063	0.332
SBR	0	0	0	0	0	0	0	0
EBL	0	0	0	0	0	0	0	0
EBT	0	0	0	0	0	0	0	0
EBR	0	0	0	0	0	0	0	0
WBL	0	0	0	0	0	0	0	0
WBT	0	0	0	0	0	0	0	0
WBR	2	3200	440	0.137*	484	0.151*	521	0.163*
Sum of Critical Movements				0.603		0.663		0.798
Clearance				0.100		0.100		0.100
Total ICU				0.703		0.763		0.898
Level of Service				C		C		D

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Lakewood Blvd.
E/W Street: Imperial Highway

AM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa-city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	290	0.181*	319	0.199*	319	0.199
NBT	3	4800	770	0.206	847	0.227	1029	0.318*
NBR	s	s	220	s	242	s	499	s
SBL	1	1600	180	0.112	198	0.124	198	0.124*
SBT	3	4800	650	0.156*	715	0.172*	764	0.187
SBR	s	s	100	s	110	s	134	s
EBL	1	1600	90	0.056	99	0.062	190	0.119
EBT	3	4800	770	0.219*	847	0.241*	1029	0.279*
EBR	s	s	280	s	308	s	308	s
WBL	1	1600	190	0.119*	209	0.131*	270	0.169*
WBT	3	4800	990	0.219	1089	0.241	1136	0.250
WBR	s	s	60	s	66	s	66	s
Sum of Critical Movements				0.675		0.743		0.890
Clearance				0.100		0.100		0.100
Total ICU				0.775		0.843		0.990
Level of Service				C		D		E

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Lakewood Blvd.
E/W Street: I-105 On/Off Ramps

AM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa-city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	2	3200	240	0.075*	264	0.082*	264	0.082*
NBT	2	3200	500	0.156	550	0.172	687	0.215
NBR	0	0	0	0	0	0	0	0
SBL	0	0	0	0	0	0	0	0
SBT	2	3200	840	0.263*	924	0.289*	978	0.306*
SBR	2	3200	340	0.106	374	0.117	429	0.134
EBL	2	3200	590	0.184*	649	0.203*	868	0.271*
EBT	0	0	0	0	0	0	0	0
EBR	1	1600	500	0.312	550	0.344	550	0.344
WBL	2	3200	140	0.044	154	0.048	154	0.048
WBT	0	0	0	0	0	0	0	0
WBR	1	1600	150	0.094*	165	0.103*	248	0.155*
Sum of Critical Movements				0.616		0.677		0.814
Clearance				0.100		0.100		0.100
Total ICU				0.716		0.777		0.914
Level of Service				C		C		E

s = Shared Lane

*** = Critical Movement**

ICU CALCULATION

N/S Street: Lakewood Boulevard
E/W Street: Gardendale Street/Foster Road

AM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move- ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	50	0.031*	55	0.034*	55	0.034*
NBT	2	3200	620	0.212	682	0.234	763	0.259
NBR	s	s	60	s	66	s	66	s
SBL	1	1600	50	0.031	55	0.034	62	0.039
SBT	2	3200	740	0.250*	814	0.275*	835	0.284*
SBR	s	s	60	s	66	s	73	s
EBL	1	1600	150	0.094*	165	0.103*	193	0.121*
EBT	2	3200	290	0.112	319	0.124	319	0.124
EBR	s	s	70	s	77	s	77	s
WBL	1	1600	130	0.081	143	0.089	143	0.089
WBT	2	3200	370	0.173*	407	0.191*	407	0.200*
WBR	s	s	185	s	204	s	232	s
Sum of Critical Movements				0.548		0.603		0.639
Clearance				0.100		0.100		0.100
Total ICU				0.648		0.703		0.739
Level of Service				B		C		C

s = Shared Lane

*** = Critical Movement**

ICU CALCULATION

N/S Street: Bellflower Blvd.
E/W Street: Stewart & Gray Road

AM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa-city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	240	0.150*	264	0.165*	297	0.186*
NBT	2	3200	620	0.234	682	0.258	729	0.292
NBR	s	s	130	s	143	s	207	s
SBL	1	1600	60	0.038	66	0.041	66	0.041
SBT	2	3200	400	0.131*	440	0.144*	622	0.202*
SBR	s	s	20	s	22	s	26	s
EBL	1	1600	10	0.006	11	0.007	13	0.008
EBT	2	3200	710	0.222*	781	0.244*	791	0.247*
EBR	1	1600	270	0.169	297	0.186	404	0.252
WBL	1	1600	110	0.069*	121	0.076*	382	0.239*
WBT	2	3200	490	0.159	539	0.175	555	0.180
WBR	s	s	20	s	22	s	22	s
Sum of Critical Movements				0.572		0.629		0.874
Clearance				0.100		0.100		0.100
Total ICU				0.672		0.729		0.974
Level of Service				B		C		E

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Bellflower Blvd.
E/W Street: Washburn Road

AM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa-city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	0	0	0	0	0	0	0	0
NBT	2	3200	860	0.341*	946	0.375*	1126	0.440*
NBR	s	s	230	s	253	s	283	s
SBL	1	1600	240	0.150*	264	0.165*	267	0.167*
SBT	2	3200	560	0.175	616	0.192	1187	0.371
SBR	0	0	0	0	0	0	0	0
EBL	0	0	0	0	0	0	0	0
EBT	0	0	0	0	0	0	0	0
EBR	0	0	0	0	0	0	0	0
WBL	1	1600	120	0.075*	132	0.082*	261	0.163*
WBT	0	0	0	0	0	0	0	0
WBR	1	1600	130	0.081	143	0.089	147	0.092
Sum of Critical Movements				0.566		0.622		0.770
Clearance				0.100		0.100		0.100
Total ICU				0.666		0.722		0.870
Level of Service				B		C		D

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Bellflower Blvd.
E/W Street: Imperial Highway

AM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move- ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	170	0.106	187	0.117	374	0.234
NBT	2	3200	780	0.347*	858	0.382*	1187	0.484*
NBR	s	s	330	s	363	s	363	s
SBL	1	1600	80	0.050*	88	0.055*	131	0.082*
SBT	2	3200	520	0.200	572	0.220	676	0.252
SBR	s	s	120	s	132	s	132	s
EBL	1	1600	160	0.100	176	0.110	176	0.110*
EBT	3	4800	700	0.181*	770	0.199*	798	0.212
EBR	s	s	170	s	187	s	222	s
WBL	1	1600	370	0.231*	407	0.254*	407	0.254
WBT	3	4800	1200	0.283	1320	0.312	1470	0.369*
WBR	s	s	160	s	176	s	299	s
Sum of Critical Movements				0.809		0.890		1.045
Clearance				0.100		0.100		0.100
Total ICU				0.909		0.990		1.145
Level of Service				E		E		F

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Bellflower Blvd.
E/W Street: I-105 Westbound On/Off Ramps

AM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa-city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	260	0.162*	286	0.179*	286	0.179*
NBT	2	3200	1010	0.316	1111	0.347	1437	0.449
NBR	0	0	0	0	0	0	0	0
SBL	0	0	0	0	0	0	0	0
SBT	3	4800	770	0.225*	847	0.247*	934	0.276*
SBR	s	s	310	s	341	s	393	s
EBL	0	0	0	0	0	0	0	0
EBT	0	0	0	0	0	0	0	0
EBR	0	0	0	0	0	0	0	0
WBL	1	1600	190	0.094	209	0.103	209	0.131
WBT	1s	1600	0	0.094	0	0.103	0	0.149
WBR	1	1600	260	0.094*	286	0.103*	476	0.149*
Sum of Critical Movements				0.481		0.529		0.604
Clearance				0.100		0.100		0.100
Total ICU				0.581		0.629		0.704
Level of Service				A		B		C

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Bellflower Blvd.
E/W Street: I-105 Eastbound On/Off Ramps

AM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa-city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	0	0	0	0	0	0	0	0
NBT	3	4800	770	0.200*	847	0.220*	983	0.248*
NBR	s	s	190	s	209	s	209	s
SBL	1	1600	210	0.131*	231	0.144*	283	0.177*
SBT	2	3200	740	0.231	814	0.254	849	0.265
SBR	0	0	0	s	0	0	0	0
EBL	1	1600	510	0.200*	561	0.220*	751	0.260*
EBT	1s	1600	0	0.200	0	0.220	0	0.260
EBR	1	1600	450	0.200	495	0.220	495	0.260
WBL	0	0	0	0	0	0	0	0
WBT	0	0	0	0	0	0	0	0
WBR	0	0	0	0	0	0	0	0
Sum of Critical Movements				0.531		0.584		0.685
Clearance				0.100		0.100		0.100
Total ICU				0.631		0.684		0.785
Level of Service				B		B		C

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Clark Avenue
E/W Street: Imperial Highway

AM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	190	0.119*	209	0.131*	209	0.131*
NBT	2	3200	280	0.112	308	0.124	354	0.166
NBR	s	s	80	s	88	s	178	s
SBL	1	1600	50	0.031	55	0.034	55	0.034
SBT	2	3200	190	0.069*	209	0.076*	221	0.084*
SBR	s	s	30	s	33	s	47	s
EBL	1	1600	70	0.044	77	0.048	152	0.095
EBT	3	4800	950	0.231*	1045	0.254*	1409	0.330*
EBR	s	s	160	s	176	s	176	s
WBL	1	1600	220	0.137*	242	0.151*	265	0.166*
WBT	3	4800	1050	0.238	1155	0.261	1249	0.281
WBR	s	s	90	s	99	s	99	s
Sum of Critical Movements				0.556		0.612		0.711
Clearance				0.100		0.100		0.100
Total ICU				0.656		0.712		0.811
Level of Service				B		C		D

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Ardis Avenue
E/W Street: Imperial Highway

AM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move- ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	80	0.050	88	0.055	88	0.055*
NBT	1	1600	5	0.053*	6	0.059*	74	0.101
NBR	s	s	80	s	88	s	88	s
SBL	s/1	s/1600	10	s	11	s	74	0.046
SBT	1	1600	5	0.016*	6	0.017*	24	0.095*
SBR	s	s	10	s	11	s	128	s
EBL	1	1600	10	0.006	11	0.069	465	0.291*
EBT	3	4800	920	0.225*	1012	0.247*	1012	0.247
EBR	s	s	160	s	176	s	176	s
WBL	1	1600	150	0.094*	165	0.103*	165	0.103
WBT	3	4800	1240	0.262	1364	0.289	1364	0.284*
WBR	s/1	s/1600	20	s	22	s	359	0.224
Sum of Critical Movements				0.388		0.426		0.725
Clearance				0.100		0.100		0.100
Total ICU				0.488		0.526		0.825
Level of Service				A		A		D

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Woodruff Avenue (West)
E/W Street: Firestone Blvd.

AM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move- ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	0	0	0	0	0	0	0	0
NBT	0	0	0	0	0	0	0	0
NBR	1	1600	0	0	0	0	0	0
SBL	2	3200	370	0.116*	407	0.127*	475	0.148*
SBT	0	0	0	0	0	0	0	0
SBR	1	1600	140	0.088	154	0.096	154	0.096
EBL	1	1600	80	0.050*	88	0.055*	88	0.055*
EBT	3	4800	1010	0.212	1111	0.234	1111	0.234
EBR	s	s	10	s	11	s	11	s
WBL	0	0	0	0	0	0	0	0
WBT	3	4800	1810	0.437*	1991	0.481*	1991	0.485*
WBR	s	s	290	s	319	s	337	s
Sum of Critical Movements				0.603		0.663		0.688
Clearance				0.100		0.100		0.100
Total ICU				0.703		0.763		0.788
Level of Service				C		C		C

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Woodruff Avenue (East)

E/W Street: Firestone Blvd.

AM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa-city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	2	3200	650	0.203*	715	0.223*	733	0.229*
NBT	s	s	0	0	0	0	0	0
NBR	1	1600	160	0.100	176	0.110	176	0.110
SBL	0	0	0	0	0	0	0	0
SBT	0	0	0	0	0	0	0	0
SBR	1	1600	0	0	0	0	0	0
EBL	0	0	0	0	0	0	0	0
EBT	3	4800	990	0.206*	1089	0.227*	1089	0.227*
EBR	1	1600	380	0.238	418	0.231	486	0.304
WBL	1	1600	230	0.144*	253	0.158*	253	0.158*
WBT	3	4800	1440	0.300	1584	0.330	1584	0.330
WBR	s	s	0	s	0	0	0	0
Sum of Critical Movements				0.553		0.608		0.614
Clearance				0.100		0.100		0.100
Total ICU				0.653		0.708		0.714
Level of Service				B		C		C

s = Shared Lane

*** = Critical Movement**

ICU CALCULATION

N/S Street: Stewart & Gray Road
E/W Street: Firestone Blvd.

AM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa-city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	0	0	0	0	0	0	0	0
NBT	0	0	0	0	0	0	0	0
NBR	2	3200	650	0.203*	715	0.223*	784	0.245*
SBL	1	1600	90	0.056	99	0.062	99	0.062
SBT	1	1600	80	0.081*	88	0.089*	116	0.107*
SBR	s	s	50	s	55	s	55	s
EBL	0	0	0	0	0	0	0	0
EBT	3	4800	1020	0.212	1122	0.234	1122	0.234*
EBR	1	1600	150	0.094	165	0.103	233	0.146
WBL	2	3200	250	0.078	275	0.086	489	0.153*
WBT	3	4800	1600	0.340*	1760	0.374*	1760	0.374
WBR	s	s	30	s	33	s	33	s
Sum of Critical Movements				0.624		0.686		0.739
Clearance				0.100		0.100		0.100
Total ICU				0.724		0.786		0.839
Level of Service				C		C		D

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Woodruff Avenue
E/W Street: Stewart & Gray Road

AM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move- ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	60	0.038	66	0.041	69	0.043
NBT	2	3200	720	0.244*	792	0.268*	798	0.273*
NBR	s	s	60	s	66	s	75	s
SBL	1	1600	30	0.019*	33	0.021*	33	0.021*
SBT	2	3200	570	0.178	627	0.196	653	0.204
SBR	1	1600	30	0.019	33	0.021	75	0.047
EBL	1	1600	30	0.019	33	0.021	45	0.028
EBT	2	3200	700	0.219*	770	0.241*	830	0.259*
EBR	1	1600	120	0.075	132	0.082	134	0.084
WBL	1	1600	50	0.031*	55	0.034*	93	0.058*
WBT	2	3200	500	0.166	550	0.182	782	0.255
WBR	s	s	30	s	33	s	33	s
Sum of Critical Movements				0.513		0.564		0.611
Clearance				0.100		0.100		0.100
Total ICU				0.613		0.664		0.711
Level of Service				B		B		C

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Woodruff Avenue (East)
E/W Street: Imperial Highway

AM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa-city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	120	0.075*	132	0.082*	186	0.116*
NBT	2	3200	640	0.200	704	0.220	735	0.230
NBR	1	1600	140	0.088	154	0.096	154	0.096
SBL	1	1600	50	0.031	55	0.034	55	0.034
SBT	2	3200	650	0.203*	715	0.223*	724	0.226*
SBR	1	1600	60	0.038	66	0.041	66	0.041
EBL	1	1600	110	0.069*	121	0.076*	121	0.076*
EBT	3	4800	750	0.188	825	0.206	881	0.221
EBR	s	s	150	s	165	s	180	s
WBL	1	1600	130	0.081	143	0.089	143	0.089
WBT	3	4800	1180	0.264*	1298	0.291*	1517	0.337*
WBR	s	s	90	s	99	s	99	s
Sum of Critical Movements				0.611		0.672		0.755
Clearance				0.100		0.100		0.100
Total ICU				0.711		0.772		0.855
Level of Service				C		C		D

s = Shared Lane

*** = Critical Movement**

ICU CALCULATION

N/S Street: Lakewood Blvd.
E/W Street: Firestone Blvd.

PM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	120	0.075	132	0.082	290	0.181
NBT	2	3200	1190	0.372*	1309	0.409*	1467	0.458*
NBR	1	1600	220	0.138	242	0.151	242	0.151
SBL	1	1600	260	0.163*	286	0.179*	286	0.179*
SBT	2	3200	1020	0.341	1122	0.375	1184	0.394
SBR	s	s	70	s	77	s	77	s
EBL	1	1600	370	0.231*	407	0.254*	407	0.254*
EBT	3	4800	1720	0.394	1892	0.433	1892	0.446
EBR	s	s	170	s	187	s	249	s
WBL	1	1600	160	0.100	176	0.110	176	0.110
WBT	3	4800	1320	0.275*	1452	0.302*	1452	0.302*
WBR	1	1600	240	0.150	264	0.165	264	0.165
Sum of Critical Movements				1.041		1.144		1.193
Clearance				0.100		0.100		0.100
Total ICU				1.141		1.244		1.293
Level of Service				F		F		F

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Lakewood Blvd.
E/W Street: Bellflower Blvd.

PM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move- ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	10	0.006	11	0.007	11	0.007
NBT	2	3200	1080	0.341*	1188	0.375*	1296	0.408*
NBR	s	s	10	s	11	s	11	s
SBL	1	1600	430	0.269*	473	0.295*	544	0.340*
SBT	3	4800	930	0.194	1023	0.213	1076	0.224
SBR	s	s	0	s	0	s	0	s
EBL	0	0	0	0	0	0	0	0
EBT	1	1600	10	0.012*	11	0.014*	11	0.014*
EBR	s	s	10	s	11	s	11	s
WBL	s	s	10	0.012*	11	0.014*	11	0.014*
WBT	1	1600	10	0.012	11	0.014	11	0.014
WBR	2	3200	480	0.150	528	0.165	736	0.230
Sum of Critical Movements				0.634		0.698		0.776
Clearance				0.100		0.100		0.100
Total ICU				0.734		0.798		0.876
Level of Service				C		C		D

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Lakewood Blvd.
E/W Street: Stewart & Gray Road

PM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move- ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	200	0.125*	220	0.138*	352	0.220*
NBT	2	3200	940	0.319	1034	0.351	1128	0.380
NBR	s	s	80	s	88	s	88	s
SBL	1	1600	40	0.025	44	0.028	57	0.036
SBT	2	3200	900	0.294*	990	0.323*	1030	0.336*
SBR	s	s	40	s	44	s	44	s
EBL	1	1600	90	0.056	99	0.062	99	0.062
EBT	2	3200	730	0.291*	803	0.320*	900	0.359*
EBR	s	s	200	s	220	s	248	s
WBL	1	1600	60	0.037*	66	0.041*	66	0.041*
WBT	2	3200	540	0.338	594	0.186	778	0.243
WBR	1	1600	80	0.050	88	0.055	102	0.064
Sum of Critical Movements				0.747		0.822		0.956
Clearance				0.100		0.100		0.100
Total ICU				0.847		0.922		1.056
Level of Service				D		E		F

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Lakewood Blvd.
E/W Street: Alameda Street

PM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa-city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	120	0.075*	132	0.082*	197	0.123*
NBT	2	3200	1200	0.375	1320	0.412	1700	0.531
NBR	0	0	0	0	0	0	0	0
SBL	0	0	0	0	0	0	0	0
SBT	2	3200	1120	0.372*	1232	0.409*	1470	0.488*
SBR	s	s	70	s	77	s	91	s
EBL	1	1600	40	0.025	44	0.028	57	0.036
EBT	0	0	0	0	0	0	0	0
EBR	1	1600	110	0.069*	121	0.076*	139	0.087*
WBL	0	0	0	0	0	0	0	0
WBT	0	0	0	0	0	0	0	0
WBR	0	0	0	0	0	0	0	0
Sum of Critical Movements				0.516		0.567		0.698
Clearance				0.100		0.100		0.100
Total ICU				0.616		0.667		0.798
Level of Service				B		B		C

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Lakewood Blvd.
E/W Street: Clark Avenue

PM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa-city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	0	0	0	0	0	0	0	0
NBT	2	3200	1040	0.334*	1144	0.368*	1342	0.430*
NBR	s	s	30	s	33	s	33	s
SBL	1	1600	210	0.131*	231	0.144*	291	0.182*
SBT	2	3200	1030	0.322	1133	0.354	1499	0.468
SBR	0	0	0	0	0	0	0	0
EBL	0	0	0	0	0	0	0	0
EBT	0	0	0	0	0	0	0	0
EBR	0	0	0	0	0	0	0	0
WBL	0	0	0	0	0	0	0	0
WBT	0	0	0	0	0	0	0	0
WBR	2	3200	300	0.094*	330	0.103*	487	0.152*
Sum of Critical Movements				0.559		0.615		0.764
Clearance				0.100		0.100		0.100
Total ICU				0.659		0.715		0.864
Level of Service				B		C		D

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Lakewood Blvd.
E/W Street: Imperial Highway

PM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move- ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	370	0.231*	407	0.254*	407	0.254*
NBT	3	4800	840	0.225	924	0.248	1056	0.290
NBR	s	s	240	s	264	s	336	s
SBL	1	1600	90	0.056	99	0.062	99	0.062
SBT	3	4800	890	0.206*	979	0.227*	1223	0.303*
SBR	s	s	100	s	110	s	232	s
EBL	1	1600	120	0.075	132	0.082	198	0.124
EBT	3	4800	1190	0.269*	1309	0.296*	1368	0.308*
EBR	s	s	100	s	110	s	110	s
WBL	1	1600	210	0.131*	231	0.144*	491	0.307*
WBT	3	4800	680	0.162	748	0.179	942	0.219
WBR	s	s	100	s	110	s	110	s
Sum of Critical Movements				0.837		0.921		1.172
Clearance				0.100		0.100		0.100
Total ICU				0.937		1.021		1.272
Level of Service				E		F		F

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Lakewood Blvd.
E/W Street: I-105 On/Off Ramps

PM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	2	3200	325	0.101*	358	0.112*	358	0.112*
NBT	2	3200	880	0.275	968	0.302	1030	0.322
NBR	0	0	0	0	0	0	0	0
SBL	0	0	0	0	0	0	0	0
SBT	2	3200	870	0.272*	957	0.299*	1209	0.378*
SBR	2	3200	420	0.131	462	0.144	714	0.223
EBL	2	3200	370	0.116*	407	0.127*	509	0.159*
EBT	0	0	0	0	0	0	0	0
EBR	1	1600	340	0.212	374	0.234	374	0.234
WBL	2	3200	240	0.075	264	0.082	264	0.082
WBT	0	0	0	0	0	0	0	0
WBR	1	1600	200	0.125*	220	0.138*	260	0.162*
Sum of Critical Movements				0.614		0.676		0.811
Clearance				0.100		0.100		0.100
Total ICU				0.714		0.776		0.911
Level of Service				C		C		E

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Lakewood Boulevard
E/W Street: Gardendale Street/Foster Road

PM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	110	0.069	121	0.076	121	0.076
NBT	2	3200	880	0.313*	968	0.344*	1006	0.356*
NBR	s	s	120	s	132	s	132	s
SBL	1	1600	90	0.056*	99	0.062*	131	0.082*
SBT	2	3200	590	0.209	649	0.230	743	0.270
SBR	s	s	80	s	88	s	120	s
EBL	1	1600	100	0.062*	110	0.069*	122	0.076*
EBT	2	3200	340	0.125	374	0.138	374	0.138
EBR	s	s	60	s	66	s	66	s
WBL	1	1600	90	0.056	99	0.062	99	0.062
WBT	2	3200	340	0.131*	374	0.144*	374	0.148*
WBR	s	s	80	s	88	s	100	s
Sum of Critical Movements				0.562		0.619		0.662
Clearance				0.100		0.100		0.100
Total ICU				0.662		0.719		0.762
Level of Service				B		C		C

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Bellflower Blvd.
E/W Street: Stewart & Gray Road

PM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move- ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	170	0.106*	187	0.117*	341	0.213
NBT	2	3200	460	0.203	506	0.223	700	0.370*
NBR	s	s	190	s	209	s	483	s
SBL	1	1600	30	0.019	33	0.021	33	0.021*
SBT	2	3200	430	0.140*	473	0.155*	531	0.177
SBR	s	s	20	s	22	s	35	s
EBL	1	1600	40	0.025	44	0.028	58	0.036
EBT	2	3200	540	0.169*	594	0.185*	650	0.203*
EBR	1	1600	250	0.156	275	0.172	320	0.200
WBL	1	1600	150	0.094*	165	0.103*	251	0.157*
WBT	2	3200	480	0.319	528	0.175	580	0.192
WBR	s	s	30	s	33	s	33	s
Sum of Critical Movements				0.509		0.560		0.751
Clearance				0.100		0.100		0.100
Total ICU				0.609		0.660		0.851
Level of Service				B		B		D

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Bellflower Blvd.
E/W Street: Washburn Road

PM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa-city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	0	0	0	0	0	0	0	0
NBT	2	3200	770	0.260*	847	0.285*	1558	0.548*
NBR	s	s	60	s	66	s	196	s
SBL	1	1600	80	0.050*	88	0.055*	102	0.064*
SBT	2	3200	760	0.238	836	0.261	1152	0.360
SBR	0	0	0	0	0	0	0	0
EBL	0	0	0	0	0	0	0	0
EBT	0	0	0	0	0	0	0	0
EBR	0	0	0	0	0	0	0	0
WBL	1	1600	50	0.031*	55	0.035*	91	0.057*
WBT	0	0	0	0	0	0	0	0
WBR	1	1600	80	0.050	88	0.055	101	0.063
Sum of Critical Movements				0.341		0.375		0.669
Clearance				0.100		0.100		0.100
Total ICU				0.441		0.475		0.769
Level of Service				A		A		C

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Bellflower Blvd.
E/W Street: Imperial Highway

PM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa-city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	160	0.100	176	0.110	211	0.132
NBT	2	3200	540	0.241*	594	0.265*	790	0.326*
NBR	s	s	230	s	253	s	253	s
SBL	1	1600	160	0.100*	176	0.110*	360	0.225*
SBT	2	3200	510	0.209	561	0.230	997	0.367
SBR	s	s	160	s	176	s	176	s
EBL	1	1600	180	0.112	198	0.124	198	0.124
EBT	3	4800	1250	0.287*	1375	0.316*	1507	0.378*
EBR	s	s	130	s	143	s	308	s
WBL	1	1600	160	0.100*	176	0.110*	176	0.110*
WBT	3	4800	780	0.188	858	0.206	886	0.232
WBR	s	s	120	s	132	s	229	s
Sum of Critical Movements				0.728		0.801		1.039
Clearance				0.100		0.100		0.100
Total ICU				0.828		0.901		1.139
Level of Service				D		E		F

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Bellflower Blvd.
E/W Street: I-105 Westbound On/Off Ramps

PM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa-city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	210	0.131*	231	0.144*	231	0.144*
NBT	2	3200	730	0.228	803	0.251	950	0.297
NBR	0	0	0	0	0	0	0	0
SBL	0	0	0	0	0	0	0	0
SBT	3	4800	600	0.175*	660	0.193*	1040	0.318*
SBR	s	s	240	s	264	s	486	s
EBL	0	0	0	0	0	0	0	0
EBT	0	0	0	0	0	0	0	0
EBR	0	0	0	0	0	0	0	0
WBL	1	1600	210	0.088	231	0.096	231	0.114
WBT	1s	1600	0	0.088	0	0.096	0	0.114
WBR	1	1600	210	0.088*	231	0.096*	315	0.114*
Sum of Critical Movements				0.394		0.433		0.576
Clearance				0.100		0.100		0.100
Total ICU				0.494		0.533		0.676
Level of Service				A		A		B

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Bellflower Blvd.
E/W Street: I-105 Eastbound On/Off Ramps

PM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move- ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	0	0	0	0	0	0	0	0
NBT	3	4800	640	0.162*	704	0.179*	766	0.192*
NBR	s	s	140	s	154	s	154	s
SBL	1	1600	140	0.088*	154	0.096*	376	0.235*
SBT	2	3200	670	0.209	737	0.230	895	0.280
SBR	0	0	0	0	0	0	0	0
EBL	1	1600	310	0.131*	341	0.144*	426	0.162*
EBT	1s	1600	0	0.131	0	0.144	0	0.162
EBR	1	1600	320	0.131	352	0.144	352	0.162
WBL	0	0	0	0	0	0	0	0
WBT	0	0	0	0	0	0	0	0
WBR	0	0	0	0	0	0	0	0
Sum of Critical Movements				0.381		0.419		0.589
Clearance				0.100		0.100		0.100
Total ICU				0.481		0.519		0.689
Level of Service				A		A		B

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Clark Avenue
E/W Street: Imperial Highway

PM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	50	0.031	55	0.034	55	0.034
NBT	2	3200	210	0.097*	231	0.106*	264	0.126*
NBR	s	s	100	s	110	s	139	s
SBL	1	1600	90	0.056*	99	0.062*	99	0.062*
SBT	2	3200	130	0.050	143	0.055	204	0.095
SBR	s	s	30	s	33	s	99	s
EBL	1	1600	40	0.025	44	0.028	58	0.036
EBT	3	4800	1340	0.319*	1474	0.351*	1591	0.375*
EBR	s	s	190	s	209	s	209	s
WBL	1	1600	180	0.112*	198	0.124*	295	0.184*
WBT	3	4800	960	0.212	1056	0.234	1443	0.314
WBR	s	s	60	s	66	s	66	s
Sum of Critical Movements				0.584		0.643		0.747
Clearance				0.100		0.100		0.100
Total ICU				0.684		0.743		0.847
Level of Service				B		C		D

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Ardis Avenue
E/W Street: Imperial Highway

PM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	1	1600	80	0.050	88	0.055	88	0.055*
NBT	1	1600	5	0.053*	5	0.058*	36	0.078
NBR	s	s	80	s	88	s	88	s
SBL	s/1	s/1600	5	s	5	s	308	0.192
SBT	1	1600	5	0.012*	5	0.013*	84	0.358*
SBR	s	s	10	s	11	s	489	s
EBL	1	1600	10	0.006	11	0.007	157	0.098
EBT	3	4800	1450	0.319*	1595	0.351*	1595	0.351*
EBR	s	s	80	s	88	s	88	s
WBL	1	1600	40	0.025*	44	0.028*	44	0.028*
WBT	3	4800	1090	0.231	1199	0.254	1199	0.250
WBR	s/1	s/1600	20	s	22	s	85	0.053
Sum of Critical Movements				0.409		0.450		0.792
Clearance				0.100		0.100		0.100
Total ICU				0.509		0.550		0.892
Level of Service				A		A		D

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Woodruff Avenue (West)
E/W Street: Firestone Blvd.

PM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa-city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	0	0	0	0	0	0	0	0
NBT	0	0	0	0	0	0	0	0
NBR	1	1600	20	0.012*	22	0.014*	22	0.014*
SBL	2	3200	440	0.138*	484	0.151*	515	0.161*
SBT	0	0	0	0	0	0	0	0
SBR	1	1600	20	0.012	22	0.014	22	0.014
EBL	1	1600	130	0.081*	143	0.089*	143	0.089*
EBT	3	4800	1640	0.342	1804	0.376	1804	0.376
EBR	s	s	0	s	0	s	0	s
WBL	1	1600	30	0.019	33	0.021	33	0.021
WBT	3	4800	1340	0.350*	1474	0.385*	1474	0.401*
WBR	s	s	340	s	374	s	453	s
Sum of Critical Movements				0.581		0.639		0.665
Clearance				0.100		0.100		0.100
Total ICU				0.681		0.739		0.765
Level of Service				B		C		C

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Woodruff Avenue (East)

E/W Street: Firestone Blvd.

PM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa- city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	2	3200	540	0.169*	594	0.186*	673	0.210*
NBT	s	s	0	0	0	0	0	0
NBR	1	1600	140	0.088	154	0.096	154	0.096
SBL	0	0	0	0	0	0	0	0
SBT	0	0	0	0	0	0	0	0
SBR	1	1600	30	0.019*	33	0.020*	33	0.021*
EBL	1	1600	20	0.012	22	0.014	22	0.014
EBT	3	4800	1590	0.331*	1749	0.364*	1749	0.364*
EBR	1	1600	520	0.325	572	0.358	603	0.377
WBL	1	1600	190	0.119*	209	0.131*	209	0.131*
WBT	3	4800	1130	0.238	1243	0.261	1243	0.261
WBR	s	s	10	s	11	s	11	s
Sum of Critical Movements				0.638		0.701		0.726
Clearance				0.100		0.100		0.100
Total ICU				0.738		0.801		0.826
Level of Service				C		D		D

s = Shared Lane

* = Critical Movement

ICU CALCULATION

N/S Street: Stewart & Gray Road
E/W Street: Firestone Blvd.

PM PEAK HOUR			Existing		2006 Without Project		2006 With Project	
Move-ment	Lanes	Capa-city	Volume	V/C	Volume	V/C	Volume	V/C
NBL	0	0	0	0	0	0	0	0
NBT	0	0	0	0	0	0	0	0
NBR	2	3200	530	0.166*	583	0.182*	888	0.277*
SBL	1	1600	80	0.050	88	0.055	88	0.055
SBT	1	1600	80	0.075*	88	0.082*	100	0.090*
SBR	s	s	40	s	44	s	44	s
EBL	0	0	0	0	0	0	0	0
EBT	3	4800	1430	0.298*	1573	0.328*	1573	0.328*
EBR	1	1600	100	0.062	110	0.069	122	0.076
WBL	2	3200	130	0.041*	143	0.045*	232	0.072*
WBT	3	4800	1240	0.275	1364	0.302	1364	0.302
WBR	s	s	80	s	88	s	88	s
Sum of Critical Movements				0.580		0.637		0.767
Clearance				0.100		0.100		0.100
Total ICU				0.680		0.737		0.867
Level of Service				B		C		D

s = Shared Lane

* = Critical Movement

APPENDIX H
Draft EIR Comment Letters and Responses to Comments

**DOWNEY LANDING SPECIFIC PLAN DRAFT EIR
COMMENT LETTERS AND RESPONSES TO COMMENTS**

FEBRUARY 2002

Prepared for:
The City of Downey
11111 Brookshire Avenue
Downey, CA 90241-7016

Prepared by:
EIP Associates
Stevens-Garland Associates
MCE Consulting Engineers

List of Comment Letters for Downey Landing Specific Plan Draft EIR

- 1) Department of Toxic Substances Control (Harlan R. Jeché)
- 2) State Clearinghouse Stamped Notice of Completion/Environmental Transmittal Form
- 3) Ezralow Retail Properties (Douglas Gray)
- 4) Department of Public Works (James A. Noyes)
- 5) Metropolitan Water District of Southern California (Laura J. Simonek)
- 6) The State of California Department of Transportation (Stephen Buswell)
- 7) Southern California Association of Governments (Jeffrey M. Smith)
- 8) Kaiser Permanente (Nancy Burke)
- 9) Linscott, Law & Greenspan, Engineers (Jack M. Greenspan)
- 10) California State Lands Commission (Marianne Wetzel)
- 11) Governor's Office of Planning and Research (Terry Roberts)
- 12) Civic Solutions (Gabriel Elliot)



Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Department of Toxic Substances Control

Edwin F. Lowry, Director
1011 N. Grandview Avenue
Glendale, California 91201

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Gray Davis
Governor

August 20, 2001

Mr. Mark Sellheim, Principal Planner
City of Downey Economic and Community Development Department
11111 Brookshire Avenue
Downey, CA 90241-7016

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE DOWNEY LANDINGS
SPECIFIC PLAN, SCH No. 2001031096

Dear Mr. Sellheim:

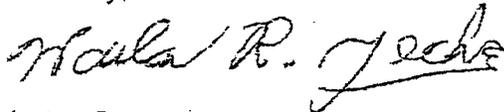
- 1-1 The Department of Toxic Substances Control (DTSC) has received the Draft Environmental Impact Report (EIR) for the above mentioned Project.
- Based on the review of the document, the DTSC comments are as follows:
- 1-2 1) The Draft EIR states that soil and groundwater contamination exists onsite. The Draft EIR needs to provide more information about onsite contamination and past hazardous substances activities.
- 1-3 2) The Draft EIR states that soil and groundwater contamination exists onsite. The Draft EIR needs to identify any known or potentially contaminated site within the proposed Project area. For all identified sites, the Draft EIR needs to evaluate whether conditions at the site pose a threat to human health or the environment.
- 1-4 3) The Draft EIR needs to be specific in identifying the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight. If a remediation method is already known, the Draft EIR should address that.
- 1-5 4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate Health and Safety procedures should be implemented.

Mr. Sellheim
August 20, 2001
Page 2

1-6 DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). Also, DTSC is administering the \$85 million Urban Cleanup Loan Program (UCLP), which will provides low-interest loans to investigate and cleanup hazardous materials at properties where redevelopment is likely to have a beneficial impact to a community. The program is composed of two main components: low interest loans of up to \$100,000 to conduct preliminary endangerment assessments of underutilized properties; and loans of up to \$2.5 million for the cleanup or removal of hazardous materials also at underutilized urban properties. These loans are available to developers, businesses, schools, and local governments.

For additional information on the VCP or UCLP, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further please contact Arman Moheban, Project Manager, at (818) 551-2834 or me at (818) 551-2877.

Sincerely,



Harlan R. Jeché
Unit Chief
Southern California Cleanup Operations - Glendale Office

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

Mr. Guenther W. Moskat, Chief
Planning and Environmental Analysis Section
CEQA Tracking Center
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

See NOTE below
SCH # 2001031096

Notice of Completion and Environmental Document Transmittal Form

1. Project Title: Downey Landing Specific Plan Environmental Impact Report
2. Lead Agency: City of Downey, Economic and Community Devel. Dept.
3. Contact Person: Mark Seilheim, Principal Planner
3a. Street Address: 11111 Brookshire Avenue
3b. City: Downey
3c. County: Los Angeles
3d. Zip: 90241-7016
3e. Phone: (562) 904-7154

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Project Location
4. County: Los Angeles
4a. City/Community: Downey
4b. Assessor's Parcel No. 6256-004-900
4c. Section: unnamed Twp: 3 S Range: 12 W Base: South Gate
5a. Cross Streets: Lakewood Blvd. and Stewart and Gray Rd.
5b. For Rural, Nearest Community: N/A
6. Within 2 Miles: 6a. State Hwy. # N/A
6b. Airports: N/A

6c. Schools: Downey, Warren, Bellflower, Norwalk, Paramount, Santa Fe, St. John Bosco, Pius X, and Continuation High Schools; 6 Middle Schools; 29 Elementary Schools
6d. Railways: Union Pacific, < 2 mi north of the project site
6e. Waterways: San Gabriel River, 3/4 mi east of the project site

- 7. Document Type: CEQA: [] 01. NOP, [] 02. Early Consultation, [] 03. Negative Declaration, [x] 04. Draft EIR, [] 05. Supplement/Subsequent EIR, [] 06. Notice of Exemption, [] 07. Notice of Completion, [] 08. Notice of Determination, [] 09. Notice of Intent, [] 10. FONSI, [] 11. Draft EIS, [] 12. Env. Assessment, [] 13. Joint Document, [] 14. Final Document, [] 15. Other
8. Local Action Type: [] 01. General Plan Update, [] 02. New Element, [] 03. General Plan Amendment, [] 04. Master Plan, [] 05. Annexation, [x] 06. Specific Plan, [] 07. Community Plan, [x] 08. Redevelopment, [] 09. Rezone, [] 10. Land Division, [] 11. Use Permit, [] 12. Waste Management Plan, [] 13. Cancel Agricultural Preserve, [] 14. Other
9. Development Type: [] 01. Residential, [x] 02. Office, [x] 04. Shopping/Commercial, [] 05. Water Facilities, [] 06. Transportation, [] 07. Mining, [] 08. Power, [] 09. Waste Treatment, [] 10. OCS Related, [x] 11. Other
10. Total Acres: 160
11. Total Jobs Created: N/A

- 12. Project Issues Discussed in Document: [x] 01. Aesthetic/Visual, [] 02. Agricultural Land, [x] 03. Air Quality, [] 04. Archaeological/Historical, [] 05. Coastal Zone, [] 06. Economic, [] 07. Fire Hazard, [x] 08. Flooding/Drainage, [] 09. Geologic/Seismic, [x] 10. Jobs/Housing Balance, [] 11. Minerals, [] 12. Noise, [x] 13. Public Services, [x] 14. Schools, [] 15. Septic Systems, [x] 16. Sewer Capacity, [] 17. Social, [] 18. Soil Erosion, [x] 19. Solid Waste, [x] 20. Toxic/Hazardous, [x] 21. Traffic/Circulation, [] 22. Vegetation, [x] 23. Water Quality, [x] 24. Water Supply, [] 25. Wetland/Riparian, [] 26. Wildlife, [x] 27. Growth Inducing, [x] 28. Incompatible Land use, [x] 29. Cumulative Effects, [] 30. Other

13. Funding (approx.): Federal \$ N/A, State \$ N/A, Total \$ N/A
14. Present Land Use and Zoning: Mixed Use (includes commercial and industrial uses)

15. Project Description: Specific plan for a multiple-use development on the 160-acre former Rockwell/Boeing site in Downey. Proposed land uses include a shopping center, offices, buildings designed to accommodate research and development activities, and a Kaiser Permanente hospital and medical office facility, with supporting uses. Together, the project's buildings will total a maximum of approximately 3.7 million square feet of floor area in four distinct land use areas.

Ezralow Proposal

Ezralow Area I encompasses slightly more than 34 acres and occupies the northern portion of the project site. A planned retail shopping center will occupy this area, and will be oriented toward Lakewood Boulevard and Stewart & Gray Road. The other street bordering Area I is Bellflower Boulevard. The center will feature both inline stores and freestanding buildings. Together, the center's buildings will provide a maximum of 410,000 square feet, plus parking.

Ezralow Area II will total approximately 75 acres. It supports an existing building (Building 1) that contains 913,023 square feet, which both Rockwell and the Boeing Company used for aerospace manufacturing and testing purposes. The development proposal involves either reusing the building (as well as up to seven other structures) for motion picture studio and production space or other adaptive reuse, or demolishing the majority of the building in favor of approximately 975,000 square feet of technology and business park uses. Parking would be provided to serve these anticipated uses. The latter option would generate the highest traffic impacts and is therefore the option examined in the EIR, to provide a conservative environmental analysis. The easternmost 8-acre portion of Area II, which abuts Bellflower Boulevard, is being reserved for the Downey Unified School District for use as a school/park site; however, neither the Specific Plan nor this EIR will title or provide environmental clearance for development of any school, and the District would be required to initiate a separate environmental process if it chooses to develop the site.

Ezralow Area III will be developed as an office park. It will encompass 32 acres and occupy the southern portion of the project site; plans show Area III will front Clark Avenue and Imperial Highway. Planned improvements consist of 2-story office buildings, ranging in floor area from 49,000 to 70,000 square feet, for a combined maximum of 600,000 square feet. In addition to technology and business park uses, a portion of Area III, ranging in size from 3 to 5 acres, would include a maximum 50,000-square-foot museum/learning center/community center.

Open and green space uses will be interspersed throughout the project site, as well. Construction of each phase is anticipated to span 10 months. Area II is currently under temporary use by several motion picture production companies, and if Buildings 1, 9, 11, 14, 39, 288 and 6/290 are kept externally intact and reused, their occupancy would occur concurrently with construction of Area I. In the case of demolition of Buildings 1, 9, 11, 14, 39, 288, and 6/290, Areas I would be developed first, Area III second, and Area II last. Construction staging is anticipated to occur on-site.

Kaiser Permanente Proposal

Kaiser Area IV According to the development proposal submitted by Kaiser, this portion of the project would develop 1.6 million square feet of buildings and structured parking on 20 acres of land. Fifteen acres of Parcel 5 and five acres of Parcel 2, adjacent to Ezralow Area II and fronting on Bellflower Boulevard. The proposed Kaiser project is a replacement for Kaiser's existing 8-story hospital tower in the City of Bellflower. Proposed improvements include a new 6-story, 680,000-square-foot hospital building with a planned ultimate capacity of 351 beds; new, four-story, 97,500-square-foot and 195,200 square foot medical office buildings, a 27,300-square-foot central plant, and a six-level, 2,033(+/-) space, 600,000-square-foot parking structure. Construction would be phased over a period of about ten years. The specific components of each phase are tentative; however, development would not exceed 1.6 million square feet, and phasing variations would not affect the analysis presented in this EIR.

Signature of Lead Agency Representative:



Date: July 30, 2001

Reviewing Agencies

- | | |
|---|--|
| <input type="checkbox"/> Resources Agency | <input type="checkbox"/> Caltrans District <u>7</u> |
| <input type="checkbox"/> Boating/Waterways | <input type="checkbox"/> Dept. of Transportation Planning |
| <input type="checkbox"/> Conservation | <input type="checkbox"/> Aeronautics |
| <input type="checkbox"/> Fish and Game | <input type="checkbox"/> California Highway Patrol |
| <input type="checkbox"/> Forestry | <input type="checkbox"/> Housing and Community Development |
| <input type="checkbox"/> Colorado River Board | <input checked="" type="checkbox"/> Statewide Health Planning |
| <input type="checkbox"/> Dept. Water Resources | <input type="checkbox"/> Health |
| <input type="checkbox"/> Reclamation | <input type="checkbox"/> Food and Agriculture |
| <input type="checkbox"/> Parks and Recreation | <input type="checkbox"/> Public Utilities Commission |
| <input checked="" type="checkbox"/> Office of Historic Preservation | <input type="checkbox"/> Public Works |
| <input type="checkbox"/> Native American Heritage Commission | <input type="checkbox"/> Corrections |
| <input type="checkbox"/> S.F. Bay Cons. & Dev't Commission | <input type="checkbox"/> General Services |
| <input type="checkbox"/> Coastal Commission | <input type="checkbox"/> OLA |
| <input type="checkbox"/> Energy Commission | <input type="checkbox"/> Santa Monica Mountains |
| <input type="checkbox"/> State Lands Commission | <input type="checkbox"/> TRPA |
| <input type="checkbox"/> Air Resources Board | <input type="checkbox"/> OPR - OLGA |
| <input type="checkbox"/> Solid Waste Management Board | <input type="checkbox"/> OPR - Coastal |
| <input type="checkbox"/> SWRCB: Sacramento | <input type="checkbox"/> Bureau of Land Management |
| <input checked="" type="checkbox"/> SWRCB: Region # 9 | <input type="checkbox"/> Forest Service |
| <input type="checkbox"/> Water Rights | <input checked="" type="checkbox"/> Other: Department of Toxic Substances Control |
| <input type="checkbox"/> Water Quality | <input checked="" type="checkbox"/> Other: Department of Health Services |
| | <input checked="" type="checkbox"/> Other: State Fire Marshal |
| | <input checked="" type="checkbox"/> Other: Division of Mines and Geology |

For SCH Use Only

Date Received at SCH _____	Catalog Number _____
Date Review Starts _____	Applicant _____
Date to Agencies _____	Consultant _____
Date to SCH _____	Contact _____ Phone _____
Clearance Date _____	Address _____

Notes:



**EZRALOW
RETAIL
PROPERTIES**

15101 RED HILL AVENUE, SUITE 100
TUSTIN, CALIFORNIA 92780
TELEPHONE: 714-259-7700
FACSIMILE: 714-259-0153

August 30, 2001

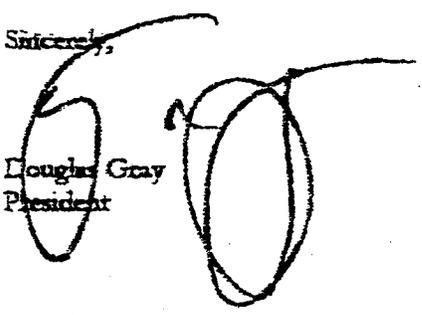
Mr. Mark Sellheim
Principal Planner
City of Downey
11111 Brookshire Avenue
Downey, California 90241-7016

RE: EIR Comments
Downey Landings Specific Plan

Dear Mark:

- 3-1 In response to the above mentioned EIR, section 3.1 page 5 calls for the developer to build an approximately three foot wall along the northern boundary of Area 1. Our intention is to build an earthen berm and landscape along the northern boundary of Area 1 to help diffuse the lighting.
- 3-2 Also mitigation measure 3.2-4 should read-wall and attic insulation that meets current title 24 requirements.
- 3-3 Mitigation measures 3.9-1 thru 3.9-7 should provide for "as feasible without the taking of additional lands."
- 3-4 Thank you for the opportunity to correct these items.

Sincerely,


Douglas Gray
President



COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100

JAMES A. NOYES, Director

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ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE REFER TO FILE WM-4

August 27, 2001

Mr. Mark Sellheim
City of Downey
11111 Brookshire Avenue
Downey, CA 90241-7016

Dear Mr. Sellheim:

**RESPONSE TO AN ENVIRONMENTAL IMPACT REPORT
DOWNEY LANDING SPECIFIC PLAN
CITY OF DOWNEY**

4-1 | Thank you for the opportunity to provide comments on an Environmental Impact Report for the proposed Downey Landing Specific Plan project. We have reviewed the submittal and offer the following comments:

Land Development (Transportation Planning)

4-2 | The proposed project may impact Lakewood Boulevard which is State Route 19. We recommend that Caltrans review the proposed specific plan.

If you have any questions, please contact Mr. Hubert Seto at (626) 458-4349.

Land Development (Geology and Soils)

L-3 | Review of the environmental document indicates that the proposed project will not have significant environmental effects from a geology and soils standpoint, provided the appropriate ordinances and codes are followed. The project is located within a mapped potentially liquefiable area, per the State of California Seismic Hazard Zone Map, South Gate Quadrangle. However, a liquefaction analysis is not warranted at this time. Detailed liquefaction analyses, conforming to the requirements of the State of California Division of Mines and Geology Special Publication 117, must be conducted at the tentative map and/or grading/building plan stages.

If you have any questions, please contact Mr. Amir Alam at (626) 458-3883.

Mr. Mark Sellheim
August 27, 2001
Page 2

Traffic and Lighting

4-4 We do not believe the proposed project will have any significant impact on County roadways or intersections. No further information is required.

4-5 We recommend the State of California Department of Transportation and adjoining cities review this document for significant impacts/mitigations within their jurisdictions.

If you have any questions, please contact Mr. Keith Hcey at (626) 300-4867.

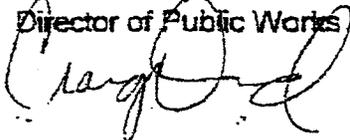
Watershed Management

4-6 The proposed project should include investigation of watershed management opportunities to maximize capture of local rainfall on the project site, minimize or eliminate incremental flows to the storm drain system, and provide filtering of flows to capture contaminants originating from the project site.

If you have any questions, please contact Ms. Massie Munroe at the address on the first page or at (626) 458-4359.

Very truly yours,

JAMES A. NOYES
Director of Public Works



ROD H. KUBOMOTO
Assistant Deputy Director
Watershed Management Division

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C:\Drainage\Mm1128.wpd

**MWD**

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Office of the General Manager

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PLANNING

August 2, 2001

Mr. Mark Sellheim
 City of Downey
 Economic and Community Development Department
 11111 Brookshire Avenue
 Downey, CA 90241-7016

Dear Mr. Mark Sellheim:

Notice of Completion and
Draft Environmental Impact Report for the Downey Landing Specific Plan

- 5-1 The Metropolitan Water District of Southern California (Metropolitan) has received a Notice of Completion (Notice) and Draft Environmental Impact Report (DEIR) for the Downey Landing Specific Plan. The applicant, the City of Downey, proposes a Specific Plan, rezoning, and other discretionary approvals for the redevelopment of a 160-acre property located at 12214 Lakewood Boulevard in the City of Downey. Proposed land uses for the development include a shopping center, offices, buildings designed to accommodate research and development activities, and a Kaiser Permanente hospital and medical office facility, with supporting uses. This letter contains our response as a potentially affected public agency.
- 5-2 Our review of the Notice indicates that Metropolitan's Lower Feeder Pipeline is adjacent to the northern and northeastern boundaries of the proposed project site. Metropolitan requests that the Final EIR evaluate potential impacts and if applicable, proposed mitigation measures, of the proposed plan to Metropolitan's existing facilities that occur adjacent to the plan's boundaries. The enclosed map shows these facilities in relation to the proposed project. It will be necessary for the applicant to consider these facilities in its project planning.
- 5-3 In order to avoid potential conflicts with Metropolitan's rights-of-way, we request that any preliminary engineering design drawings or improvement plans for any activity in the area of Metropolitan's pipelines and rights-of-way be submitted for our review and written approval. The applicant may obtain detailed prints of drawings of Metropolitan's pipelines and rights-of-way by calling Metropolitan's Substructures Information Line at (213) 217-6564. To assist the applicant in preparing plans that are compatible with Metropolitan's facilities and easements, we have enclosed a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties,

Mr. Mark Sellheim

Page 2

August 2, 2001

and/or Easements of The Metropolitan Water District of Southern California." Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way.

5-4 Metropolitan requests that the City analyze the consistency of the proposed project with the growth management plan adopted by the Southern California Association of Governments (SCAG). Metropolitan uses SCAG's population, housing and employment projections to determine future water demand. Development above these forecast provisions may increase demand on Metropolitan's resources and facilities beyond that anticipated.

5-5 Additionally, Metropolitan encourages projects within its service area to include water conservation measures. Water conservation, reclaimed water use, and groundwater recharge programs are integral components to regional water supply planning. Metropolitan supports mitigation measures such as using water efficient fixtures, drought-tolerant landscaping, and reclaimed water to offset any increase in water use associated with the proposed project.

5-6 We appreciate the opportunity to provide input to your planning process and we look forward to receiving future environmental documentation on this project. If we can be of further assistance, please contact me at (213) 217-6242.

Very truly yours,



Laura J. Simonick
Principal Environmental Specialist

SAK

Enclosures:
Facilities Location Map
Planning Guidelines

DEPARTMENT OF TRANSPORTATION
 OFFICE OF REGIONAL PLANNING
 DISTRICT 7, IGR/CEQA 1-10C
 120 SO. SPRING ST.
 LOS ANGELES, CA 90012
 TEL: (213) 897-6696 ATSS: 8-647-6696
 FAX: (213) 897-6317

August 29, 2001



IGR/CEQA cs/010819
 DEIR
 City of Downey
 Downey Landing Specific Plan
 12214 Lakewood Blvd.
 Vic. LA-105-15.76
 SCH # 2001031096

RECEIVED

SEP 05 2001

PLANNING

Mr. Mark Sellheim
 City of Downey
 11111 Brookshire Ave.
 Downey, CA 90241

Dear Mr. Sellheim:

Thank you for including the California Department of Transportation in the environmental review process for the above-mentioned project. Based on the information received, we have the following comments:

- 6-1 The trips generated by the retail center, studio/production facilities, the office and hospital facilities will have a significant traffic impact on the mainline Century Freeway (I-105). The proposed development generates approximately 3,000 vehicles/hour for the retail, studio/production and office facilities and an additional 1700 vehicles/hour for the hospital. With the additional traffic to be generated by the development, the Century Freeway is expected to operate at level of-service LOS-F0 from west of Lakewood Blvd. to east of Bellflower Blvd.
- 6-2 The Century Freeway and associated Lakewood Blvd. and Bellflower Blvd. ramps are located just south of the project site. Since the trips generated by the project will have a significant impact on the mainline 105 Freeway during the peak commute periods, further traffic analysis will be needed to determine the project's impact on the mainline 105 Freeway and will need to identify mitigation measures for the mainline 105 Freeway.
- 6-3 The local agency will need to implement a fair-share funding program on a pro rata basis to be used to mitigate traffic impacts generated by the development. Any work to be performed within the State Right-of-way will need an Encroachment Permit from the California Department of
- 6-4 Transportation. Lakewood Blvd., formerly State Route 19, was recently relinquished to the City of Downey.
- 6-5 We recommend that construction related truck trips on State highways be limited to off-peak commute periods. Transport of oversize or overweight vehicles on State highways will need a Transportation Permit from the California Department of Transportation.

If you have any questions regarding our response, refer to our internal IGR/CEQA Record # cs/010747, and please do not hesitate to contact me at (213) 897-4429.

Sincerely,

STEPHEN BUSWELL
 IGR/CEQA Program Manager

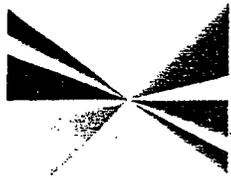
cc: Mr. Scott Morgan, State Clearinghouse

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SEP 10 2001

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SOUTHERN CALIFORNIA



ASSOCIATION of GOVERNMENTS

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Riverside County: Bob Bostez, Riverside County • ...veridge, Riverside • Greg Pettis, Cathedral... • Ron Roberts, Temecula • Jan Rudiman, ... • Charles White, Moreno Valley

San Bernardino County: Jon Mikels, San Bernardino County • Bill Alexander, Rancho... • David Eshleman, Fontana • Lee Ann... Grand Terrace • Bob Hunter, Victorville • ... Norton-Perry, Chino Hills • Judith Valles, ... Bernardino

San Diego County: Judy Mikels, Venura County • ... Becerra, Sierra Valley • Donna De Paola, San... Ventura • Toni Young, Port Hueneeme

San Diego County Transportation Commission: ... Lowe, Hemes

San Diego County Transportation Commission: ... via, Sierra Valley

September 7, 2001

Mr. Mark Sellheim
Principal Planner
City of Downey
Economic and Community Development Department
11111 Brookshire Avenue
Downey, CA 90241-7016

RE: Comments on the Draft Environmental Impact Report for the Downey Landing Specific Plan - SCAG No. I 20010436

Dear Mr. Sellheim:

7-1

Thank you for submitting the Draft Environmental Impact Report for the Downey Landing Specific Plan to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

7-2

It is recognized that the proposed Project considers the development of a Specific Plan for a multiple-use development for the former Rockwell/Boeing site in the City of Downey. In total, the proposed Project area encompasses 160-acres, on four planning areas, with a potential for 3.7 million square feet of floor area. Proposed land uses include a shopping center, offices, technology and business park, hospital and medical facilities, along with other supporting uses. The proposed Project is located at 12214 Lakewood Boulevard in the City of Downey.

7-3

SCAG staff has evaluated the Draft EIR for the Downey Landing Specific Plan for consistency with the Regional Comprehensive Plan and Guide and Regional Transportation Plan. The Draft EIR includes a discussion on the proposed Projects' consistency with SCAG policies and applicable regional plans, which were outlined in our June 26, 2001 letter on the Notice of Preparation (NOP) for this Draft EIR.

7-4

The Draft EIR cited SCAG policies and addressed the manner in which the proposed Project is consistent with applicable core policies and supportive of applicable ancillary policies. This approach to discussing consistency or support of SCAG policies is commendable and we appreciate your efforts. Based on the information provided in the Draft Program EIR, we have no further comments. A description of the proposed Project was published in the August 16, 2001 Intergovernmental Review Clearinghouse Report for public review and comment.

If you have any questions, please contact me at (213) 236-1867. Thank you.

Sincerely,

Jeffrey M. Smith
JEFFREY M. SMITH, AICP
Senior Planner

Intergovernmental Review

Medical Care Program
Walton Center
Pasadena, California 91188
(818) 495-3156



September 13, 2001

Mark Sellheim
Senior Planner
Downey Planning Department
11111 Brookshire Ave.
Downey, CA 90241

Re: Downey Landings Specific Plan EIR; State Clearinghouse #200110311096

Dear Mr. Sellheim,

8-1 Kaiser Foundation Hospitals ("Kaiser") appreciates the opportunity to review and comment on the Draft Environmental Impact Report ("DEIR") for the Downey Landing Specific Plan ("Specific Plan") which includes Kaiser's Bellflower Medical Center Replacement Project (the "Kaiser Project").

8-2 The DEIR describes the "Kaiser Area" and the Kaiser Project as the development of a hospital and medical center on fifteen acres of Parcel 5 and five acres of Parcel 2 fronting Bellflower Boulevard. Kaiser is currently exploring a proposal which would locate the Kaiser Project on the approximately 30 acre Ezralow Area III site fronting Imperial Highway. If the Kaiser Project were located in this area, neither the size nor scope of the Kaiser Project would increase. Kaiser is reviewing this alternative from a site utilization standpoint, its impact on the efficiency and functionality of the of the entire Specific Plan and possible increased efficiencies with existing Kaiser facilities. After completion of this analysis, Kaiser will determine the most desirable location. We would like the EIR to confirm that the development of the Kaiser project at this alternate location would not result in any additional impacts and is consistent with the policy objectives of the Specific Plan.

8-4 From its discussions with the City, it is Kaiser's understanding that the intent of the Specific Plan is that the entire NASA site is treated as "one contiguous site" regardless of ownership and land use and that land uses within the Specific Plan could be rearranged and "swapped". Accordingly, Kaiser is requesting that the Specific Plan explicitly acknowledge that development of the Kaiser Project in Area III would be consistent with and permitted by the Specific Plan. Since Area III was analyzed in the DEIR, utilization of Area III for development of the Kaiser Project, as described in the DEIR, would not result in any additional, undisclosed or increased impacts. Kaiser requests that the final EIR contain sufficient information to allow the City to approve the Kaiser Project on either its currently identified location or Area III.

In addition to this general comment, Kaiser offers the following specific comments on the DEIR. As you will see, we have organized our specific comments to the DEIR by page and section number.

	Page No.	Comments
8-5	1-2	We would ask that an additional sentence be added to the project description of the Kaiser Project to clarify that the impact analysis was based on a "development envelope" of 1.6 million square feet of development (1,000,000 square feet of hospital and medical office facilities and 600,000 square feet of parking structure) in structures up to 8 stories tall.
8-6	1-5	Section 1.3. We would request language acknowledging that a Program EIR can also provide project level review for portion of the project and that the Kaiser Project has been analyzed at a project level.
8-7	2-7	Section 2.5.1. The description of the Kaiser Project should include any changes that are made to § 1.1.
8-8	2-8	Section 2.5.2. Perhaps a statement that a change or modification in construction dates would not affect the environmental analysis would be helpful.
8-9	2-8	Section 2.5.3. Rezoning of the Specific Plan area should also be included as a requested approval.
8-10	3.1.2	We continue to believe that it would be helpful to state that 8 story structures do not result in aesthetic impacts and that the General Plan does not contain any height restrictions.
8-11	3.2-12	Impact 3.2-1. The last paragraph is confusing. PM_{10} is clearly identified as a less than significant impact in the discussion. However, as drafted, the last paragraph reads as if PM_{10} cannot be reduced to a less than significant level.
8-12	3.3-12	Impact 3.3-1. The necessary mitigation measures are clearly identified. Accordingly, is it necessary to speculate about what language may be included in the conveyance documents?
8-13	3.5-4	We believe that the consistency discussion of Floor Area Ratio ("FAR") should include a discussion of the FAR of the Kaiser site and acknowledge that it is higher than the rest of the project and the current projected development on the Kaiser site.
8-14	3.5-4	The FAR discussion at the bottom of the page should cross-reference the expanded discussion on page 3.5-4.
8-15	3.5-7	We believe that it would be helpful if the discussion of project consistency with Policy 3.12 include reference to Kaiser's Kaiserider program. More information on this program may be found in the attached letter from Kaiser's traffic consultant.
8-16	3.8-26	Mitigation measure 3.8-12. We question why a written agreement is necessary when the school fees are established and governed by state law. As school fees are the same in all jurisdictions, and required of all new developments, this section should state simply that Kaiser should pay required school fees.
8-17		Mitigation measure 3.8-13 appears to require the payment of fees for additional police personnel. Kaiser will provide adequate on-site security for its project and it is unclear how or why the Kaiser project would create a need for additional police services.

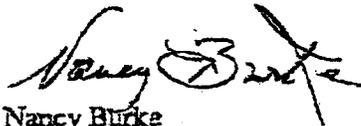
8-18

In addition to these comments, Kaiser's comments to Section 3.9, Transportation and Traffic, are set forth in the attached letter from Linscott Law & Greenspan, Kaiser's traffic consultants. Briefly summarized, Kaiser believes that the methodology used for analysis of the Kaiser Project results in a significant overstatement of the traffic impacts of the Kaiser Project. Kaiser requests that based on the corrected methodology, the impacts and mitigation discussion be revised accordingly. Also, it is important to Kaiser that additional information as to the details of specific transportation (infrastructure improvement) mitigation measures be included in the final EIR.

8-19

Thank you again for the opportunity to comment on the DEIR. Kaiser looks forward to working with you to implement the Kaiser Project, a project of mutual benefit to Kaiser, its members and the citizens of Downey.

Sincerely,



Nancy Burke
Land Use Manager
Kaiser Permanente

September 11, 2001 letter from Linscott, Law and Greenspan attached

LINSCOTT LAW & GREENSPAN

ENGINEERS

Philip M. Linscott, P.E. (1924-2000)
Jack M. Greenspan, P.E.
William A. Law, P.E. (Ret.)
Paul W. Wilkinson, P.E.
John P. Keating, P.E.
David S. Shender, P.E.
John A. Boarman, P.E.
Clare M. Look-Joeger, P.E.

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September 11, 2001

Ms. Nancy Burke

Kaiser Permanente

75 North Fair Oaks Avenue, 1st Floor, E Annex
Pasadena, California 91124

Subject: **Comment Letter**
Transportation and Traffic Section
Downey Landings Specific Plan Program DEIR

Dear Ms Burke:

As requested, Linscott, Law & Greenspan, Engineers has studied and reviewed the Transportation and Traffic Section (Section 3.9) of the Downey Landings Specific Plan Program DEIR.

9-1

Briefly, we find that the transportation and traffic analysis in the Downey Landings Specific Plan Program DEIR has been performed to the general industry standard. However, the preceding notwithstanding, we also find that the DEIR trip generation analysis significantly overstates the trip generation potential of the proposed Kaiser Medical Center; 201 trips (16.8 percent) in the AM peak hour, 570 trips (49.5 percent) in the PM peak hour, and 5,630 trips (33.5 percent) on a daily basis. On this basis, we conclude that the Kaiser Medical Center impacts will be significantly less than predicted in the DEIR.

9-2

Project Generated Traffic - Ezralow Development

Table 3.9-4 (page 3.9-9) presents the trip generation forecast for the Ezralow portion of the project. The Ezralow trip generation forecast is based on use of the trip generation equations published by the Institute of Transportation Engineers (ITE) in *Trip Generation, 6th Edition, 1997*, and presented on page 3.9-7 of the DEIR. It should be noted that there is a typographical error in the equation for Retail Average Daily Traffic, the equation $\ln(T) = 0.643\ln(X) + 3.564$, should read $\ln(T) = 0.643\ln(X) + 5.866$.

Two Ezralow development options are presented; Option 1 with Building 1, and Option 2 without Building 1. A 25 percent pass-by reduction is applied to the retail use, and an internal capture trip reduction of 5 percent in the AM peak hour, and 10 percent in the PM peak hour and on a daily basis, is applied to the total Ezralow trip generation. Option 2 (shown on the next page) shows the greater trip generation and is used in the subsequent traffic impact analysis.



ENGINEERS

Ms. Nancy Burke
Kaiser Permanente
September 11, 2001
Page Two

TRIP GENERATION - EZRALOW OPTION 2

AM Peak Hour	PM Peak Hour	Daily
2,040	2,680	23,860

Project Trip Generation - Kaiser Medical Center

Table 3.9-5 (page 3.9-10) presents the DEIR forecast for the Kaiser Medical Center portion of the Downey Landings project (see below). Unlike the Ezralow portion of the project, which is based on ITE trip generation equations, the Kaiser Medical Center trip generation forecast is based on average trip generation rates. Significantly, no internal trip capture reduction between the hospital and the medical office building components of the Kaiser Medical Center is accounted for in the DEIR trip generation forecast.

9-3

DEIR TRIP GENERATION - KAISER

AM Peak Hour	PM Peak Hour	Daily
1,397	1,722	22,450

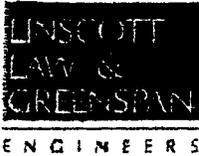
Revised Kaiser Medical Center Trip Generation

Examination of the ITE data for hospitals and for medical office buildings shows that five of the six Kaiser Medical Center trip generation components (hospital AM peak hour-PM peak hour-daily, and medical office building AM peak hour-PM peak hour-daily) have associated equations. Only the medical office building AM peak hour does not have sufficient data to develop a trip generation equation. On this basis, we conclude that the correct method of forecasting the Kaiser Medical Center trip generation is to use the ITE equations for all but the medical office AM peak hour, and use the average trip generation rate for the medical office AM peak hour. We further conclude that for consistency between the Ezralow and Kaiser trip generation analyses, internal trip capture reduction between the Kaiser hospital and medical office building components should be applied. We also conclude a 10 percent reduction in the AM peak hour, and a 20 percent reduction in the PM peak hour and on a daily basis to be appropriate, as shown below.

9-4

REVISED KAISER MEDICAL CENTER TRIP GENERATION

	AM Peak Hour	PM Peak Hour	Daily
Hospital	618	622	9,280
Medical Office Building	711	818	11,750
Total Trips	1,329	1,440	21,030
With Internal Trip Reduction (10% AM, 20% PM & Daily)	1,196	1,152	16,820



Ms. Nancy Burke
Kaiser Permanente
September 11, 2001
Page Three

DEIR Kaiser Trip Generation Overestimation

Comparison of the DEIR Kaiser Medical Center trip generation based on average trip generation rates, with the revised trip generation based on five ITE trip generation equations and one average trip generation rate, shows that the use of all average trip generation rates in the DEIR, produces a significant overestimation as set forth below.

9-5

KAISER TRIP GENERATION OVERESTIMATION

	AM Peak Hour	PM Peak Hour	Daily
DEIR Trip Generation	1,397	1,722	22,450
Revised Trip Generation	1,196	1,152	16,320
Difference	+ 201	+ 570	+ 5,630
Percent Difference	+ 16.8	+ 49.5	+ 33.5

As shown above, the DEIR AM peak hour is overestimated by 201 trips (+16.8 %), the PM peak hour overestimated by 570 trips (+ 49.5 %), and the daily traffic by 5,630 trips (+33.5 %).

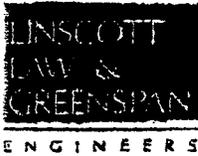
Reduced Kaiser Medical Center Intersection Impact

The DEIR predicts that the Kaiser Medical Center will impact 6 of the 20 intersections studied. Table 3.9-8 (Page 3.9-14) and Table 3.9-9 (page 3.9-15) summarize the results of the AM peak hour and PM peak hour Kaiser impact analyses. Shown to be impacted are the intersections of Lakewood Boulevard and Firestone Boulevard, Lakewood Boulevard and Bellflower Boulevard, Lakewood Boulevard and Stewart & Gray Road, Lakewood Boulevard and Imperial Highway, Bellflower Boulevard and Stewart & Gray Road, and Bellflower Boulevard and Imperial Highway as presented below.

9-6

DEIR Kaiser Intersection Impact

Intersection	AM Peak Hour	PM Peak Hour
Lakewood/Firestone	X	X
Lakewood/Bellflower	X	
Lakewood/Stewart & Gray	X	X
Lakewood/Imperial	X	X
Bellflower/Stewart & Gray	X	
Bellflower/Imperial	X	X



Ms. Nancy Burke
Kaiser Permanente
September 11, 2001
Page Four

It should be noted, that since we do not have the actual traffic impact study intersection analysis worksheets, we are unable at this time to determine the change in Kaiser Medical Center impact. However, based on the degree to which the Kaiser traffic has been overestimated, it can be concluded that the Kaiser intersection impacts predicted in the DEIR will be significantly reduced.

Reduced Kaiser Medical Center CMP Freeway Impact

Table 3.9-13 (page 3.9-19) shows the predicted Kaiser Medical Center impact at the nearest Los Angeles County Congestion Management Program (CMP) freeway monitoring station, located on Interstate 105 (I-105) between Bellflower Boulevard and Interstate 605 (I-605). The DEIR text at the bottom of page 3.9-18 sets forth the CMP impact criteria as Level of Service (LOS) F, and a change in the demand-to-capacity ratio (D/C) greater than 0.02. The text goes on to state that there is a Kaiser impact in the westbound direction of I-105 in the AM peak hour, and an impact in the eastbound direction of I-105 in the PM peak hour.

9-7

However, examination of Table 3.9-13, shows the DEIR text to be in error. The increase in D/C in the westbound AM peak hour is shown to be 0.014, which is less than 0.02, and is, therefore, not a Kaiser Medical Center impact.

Further examination of Table 3.9-13, also reveals a further error in the DEIR. The increase in D/C in the eastbound direction in the PM peak hour is shown to be 0.016, which is also less than 0.02, and also not a Kaiser impact. However, there would be a Kaiser related CMP impact if it is inferred that all calculations are to be rounded off to only two decimal places (in which case the increase in D/C of 0.016 would become 0.02). In any event, since the DEIR overestimates the Kaiser Medical Center trip generation, the rounding will become a moot issue.

Kaiserider

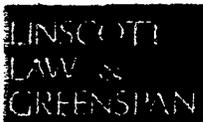
While not specifically mentioned in the DEIR trip generation analysis, Kaiser Hospitals and Medical Centers have a system-wide well established and successful ride share program known as Kaiserider. The Kaiserider program will be available at the proposed Downey Medical Center, and is in place for employees at the existing Kaiser Medical Center site (on the southwest corner of Rosecrans Avenue and Clark Avenue) who will be relocated to the Downey facility. Hence, it is also concluded that the Kaiserider program has the potential to further reduce project trip generation.

9-8

Findings and Conclusions

The DEIR ignores the ITE trip generation equations for the Kaiser hospital and medical office building components in favor of average rates, even though ITE equations are used for the Ezralow portion of the Downey Landings Specific Plan.

9-9



ENGINEERS

Ms. Nancy Burke
Kaiser Permanente
September 11, 2001
Page Five

9-10 | • The DEIR trip generation forecast for Kaiser based on average trip generation rates is significantly greater than the trip generation forecast using the ITE equations (plus one average trip generation rate for the medical office AM peak hour).

9-11 | • The DEIR trip generation analysis overstates the trip generation potential of the proposed Kaiser Medical Center by 201 trips (16.8 percent) in the AM peak hour, 570 trips (49.5 percent) in the PM peak hour, and 5,630 trips (33.5 percent) on a daily basis.

9-12 | • The DEIR is in error in concluding that Kaiser Medical Center traffic will produce a CMP freeway monitoring station impact.

9-13 | • The DEIR trip generation analysis does not take into account the Kaiser ride share program potential to reduce project trip generation.

9-14 | • We also find that the DEIR is in error in concluding that Kaiser will produce a CMP freeway monitoring station impact, in that the computed demand-to-capacity (D/C) ratios are below the stated impact threshold.

9-15 | • Based on the degree to which the Kaiser Medical Center trip generation is overstated, we conclude that the Kaiser Medical Center impacts will be significantly less than predicted in the DEIR.

9-16 | We welcome the opportunity to be of service. If there are any questions regarding the above, please do not hesitate to call me at 626.796.2322, or e-mail me at greenspan@llgeengineers.com.

Very truly yours,
Linscott, Law & Greenspan, Engineers


Jack M. Greenspan, P.E.
Principal

STATE OF CALIFORNIA

GRAY DAVIS, Governor

CALIFORNIA STATE LANDS COMMISSION
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-6202



PAUL D. THAYER, Executive Officer
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California Relay Service from TDD Phone 1-800-735-2922
from Voice Phone 1-800-735-2929

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Contact FAX: (916) 574-2065

RECEIVED

SEP 26 2001

PLANNING

September 19, 2001

File Ref: AD 385
Downey DEIR

Mr. Mark R. Sellheim
Principal Planner
11111 Brookshire Avenue
Downey, CA 90241-7015

Dear Mr. Sellheim:

10-1

The following are the California State Lands Commission's comments on the Draft Environmental Impact Report (DEIR) dated August 2, 2001, for the Downey Landing Specific Plan. Thank you for extending the time period past the September 17, 2001 deadline in order to provide us with the additional time needed to review the document and respond.

10-2

1. Page 2-5, Section 2.4, Line 13: Report mentions that the City has arranged to purchase Parcels 1 and 2 through the General Services Administration. This is a true statement. However, the actual details of the transfer of title is that NASA, through GSA, is transferring title to the property to the State of California, State Lands Commission. The State is then selling the property to the City. The State requests that it be identified as a party to the transaction. Suggested wording for the sentence: "The City of Downey has arranged to purchase Parcels 1 and 2 of the NASA plant from the State of California, State Lands Commission who is acquiring the excessed property from the General Services Administration (GSA)." Also, the sale to the City is now anticipated to occur in the Spring/Summer 2002. Also see Comment #12 which addresses the same issue found on Page 3.5-2.

10-3

2. Page 2-5, Section 2.4: In the last sentence should "analysis" be "analyzes"?

10-4

3. Page 3.3-4, Paragraph 1, last sentence: Report states that "However, another, unidentified contaminant source may remain on Parcel 2 . . ." The California Regional Water Quality Control Board (CRWQCB) has identified an isolated contaminated plume of TCE in the groundwater on Parcel 2; however, the source of this contaminant has not been identified.

Mr. Mark R. Seilheim
AD 385
September 19, 2001
Page 2

- 10-5 4. Page 3.3-5, Paragraph titled "Parcel 2": Please be more specific on the detectable concentrations of VOC's, specifically the identification of high levels of TEC in the groundwater.
- 10-6 5. Page 3.3-5, Paragraph 4 titled "Parcel 2": There is mention of two storage tanks, one aboveground and one below. Are the aboveground storage tanks mentioned on this page and other pages throughout the section required to be removed? Is the underground emergency spill containment storage tank required to be removed? If not required to be removed, were these tanks required to be capped and abandoned in place?
- 10-7 6. Page 3.3-6, Paragraph titled "Parcel 4": This paragraph does not mention the higher concentrations of PCE and TCE that were found on the northern portion of Parcel 4 (as mentioned on Page 3.3-7, first bulleted item).
- 10-8 7. Page 3.3-6, Paragraph titled "Parcel 5": What is being done with the contaminated soils and groundwater on Parcel 5 (contaminations mentioned under the second and third bulleted items on Page 3.3-7)?
- 10-9 8. Page 3.3-7, Paragraph titled "Parcel 6": Is there more information on the contamination source for the TCE in the southeast and northwest portions of Parcel 6 (as mentioned under the fourth bulleted item)?
- 10-10 9. Page 3.3-7, First bulleted item: Should "TCA" be "TCE"?
- 10-11 10. Page 3.3-9, Paragraph titled "Current and Ongoing Remediation Activities": Suggest that the first sentence be re-written to reflect that, according to the CRWQCB, further monitoring of the TCE levels and investigation as to its source has been required by the CRWQCB. It is unknown at this time if remediation of the groundwater contamination on Parcel 2 will be required by the CRWQCB to reach the level of acceptable use.
- 10-12 11. Page 3.3-12, Paragraph under "Impact 3.3-1", second sentence: Sentence should read: **However the conveyance agreements currently being formulated by the City, NASA, State Lands Commission, and the Federal (not State) General Services Administration will include measures . . .**
- 10-13 12. Page 3.5-2, Second Paragraph, Sentence #6: Sentence should be changed to accurately reflect the transfer of the property to the City. **"Through the General Services Administration (GSA), the City of Downey arranged and purchased Parcels 3, 4, 5, and 6 from NASA. Conveyance of Parcels 1 and 2 to the City from the State Lands Commission is anticipated to occur in Spring or Summer 2002 "**

Mr. Mark R. Seilheim
AD 325
September 19, 2001
Page 3

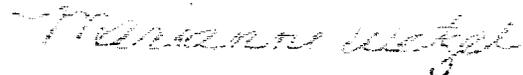
10-14 13. On Page 15 of Appendix A, First Initial Study, Section 4.0: Under No. 1, "No impact" is defined as "... will not have any measurable environmental impact ... and no additional analysis is required." Under No. 2, the City defines "Less Than Significant Impact" as "... impacts, however, will be less than the levels or thresholds that are considered significant and no additional analysis is required." The statement that "no additional analysis is required" is not true for the following listed environmental issues. How can the determination that these environmental issues have a "No Impact" or "Less Than Significant Impact" be made at this time?

10-15 a. Appendix A, pages 8 and 9, Geology and Soils: under 6(a)(3) "Seismic-related ground failure, including liquefaction", and under 6(c) "Be located on a geologic unit or soil that is unstable... as a result of liquefaction..." The site is located within a recognized and published Liquefaction Hazard Zone—as published and distributed by the State Geologist. On page 23, 4.6(a)(3), regarding liquefaction, the City recognizes the California Division of Mines and Geology report of February 1999 and cites State law that requires the developer to submit a geotechnical report (an additional analysis) to the City's Building and Safety Department. The same comment applies to comments on Appendix A, page 24, 4.6(c), in regards to liquefaction and lateral spreading. Therefore, since an additional analysis is required, how can a determination of "Less Than Significant Impact" be made?

10-16 b. Appendix A, page 11, Mineral Resources: under 10(a) "Result in a loss of availability of a known mineral resource that would be of value to the region..." The City of Downey's response is "No Impact"—also so stated on Appendix A, page 29, 4.10(a). The Bureau of Land Management (BLM) Mineral Report, dated June 19, 2001, concludes with the statement, "Therefore, it is my opinion that the rocks beneath the subject site meet the criteria for being classified prospectively valuable for oil and gas". Although oil and gas resources are not known to exist, a body of geologic information has been recognized by the BLM and by the State Lands Commission which supports at least the potential for oil and gas resources on or near the site. Additional analysis would be required to confirm or at least add further definition to the potential of oil and gas resources; therefore, how can a determination of "No Impact" be made.

10-17 Thank you for the opportunity to respond to the DEIR. Should you have any questions, please feel free to call me at 916-574-1817.

Sincerely,



Marianna Wetzel
Public Land Management Specialist

Mr. Mark R. Sellheim
AD 385
September 19, 2001
Page 4

cc: Robert Lynch, LMD
Hap Anderson, LMD
Jim Frey, Legal
Jim Martin, LMD
Bruce Crandall, LMD
Betty Silva, DEPM
Marina Voskantan, MRMD
Greg Peika, MRMD
Richard Greenwood, MRMD



Gray Davis
GOVERNOR

STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse



Steve Nissen
DIRECTOR

September 17, 2001

RECEIVED

SEP 20 2001

PLANNING

Mark Sellheim
City of Downey Economic and Community Development Department
11111 Brookshire Avenue
Downey, CA 90241-7016

Subject: Downey Landings Specific Plan
SCH#: 2001031096

Dear Mark Sellheim:

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 September 14, 2001, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

11-1

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,

Terry Roberts
Director, State Clearinghouse

Enclosures

cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2001031096
Project Title Downey Landings Specific Plan
Lead Agency Downey, City of

Type EIR Draft EIR
Description Specific Plan for a multiple-use development on the 160-acre former Rockwell/Boeing site in Downey. Proposed land uses include a shopping center, offices, plus buildings designed to accommodate research and development activities, and a Kaiser Permanente hospital and medical office facility, with supporting uses. Together, the project's buildings will total a maximum of approximately 3.7 million square feet of floor area in four distinct land use areas.

Lead Agency Contact

Name Mark Sellheim
Agency City of Downey Economic and Community Development Department
Phone 562/904-7154 **Fax**
email
Address 11111 Brookshire Avenue
City Downey **State** CA **Zip** 90241-7018

Project Location

County Los Angeles
City Downey
Region
Cross Streets Lakewood Boulevard/SR-19/Stewart and Gray Road
Parcel No. 6256-004,800
Township 3S **Range** 12W **Section** **Base** S. Gate

Proximity to:

Highways
Airports
Railways UPRR
Waterways San Gabriel River
Schools Downey/Warren/Bellflower/Norwalk/Paramount/Santa Fe/Plus X
Land Use Mixed Use (includes commercial and industrial uses)

Project Issues Aesthetic/Visual; Air Quality; Flood Plain/Flooding; Drainage/Absorption; Job Generation; Housing; Noise; Public Services; Schools/Universities; Sewer Capacity; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Department of Parks and Recreation; Reclamation Board; Caltrans, District 7; Department of Housing and Community Development; Air Resources Board, Major Industrial Projects; Integrated Waste Management Board; State Water Resources Control Board, Division of Water Quality; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission; State Lands Commission; Regional Water Quality Control Board, Region 4

Date Received 08/01/2001 **Start of Review** 08/01/2001 **End of Review** 09/14/2001



RECEIVED

DEC 12 2001

PLANNING

December 9, 2001

THOMAS G. MERRELL AICP
principal

Mark Sellheim, Principal Planner
City of Downey Economic and Community Development Department
1111 Brookshire Avenue
Downey, CA 90241-7016

RE: COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE DOWNEY LANDING SPECIFIC PLAN PROJECT.

Dear Mr. Sellheim:

Civic Solutions, Inc. would like to offer the following comments on the Draft Environmental Impact Report (EIR) for the proposed Downey Landing Specific Plan project on behalf of our client, Ms. Maria Hill et al., who resides at 12929 Sandy Lane, Downey.

Civic Solutions is a community development consulting firm providing comprehensive urban planning services to municipalities, special districts and homeowners associations. The firm is headed by Thomas G. Merrell, AICP, Principal, with over 35 years in municipal planning, and is guided by the company philosophy that community planning and development ultimately serve the public interest. Experienced urban planning professionals with extensive background in public and private sector service staff our firm. We sincerely thank you for considering our comments.

PROJECT SETTING

The Downey Landing Specific Plan project site is designated on the City of Downey General Plan Map as Mixed-Use, which allows commercial and manufacturing uses, or a combination of them. The site is zoned General Manufacturing (M2). The area is bounded by Stuart and Gray Road (north), Imperial Highway (south), Bellflower Boulevard (east), and Lakewood Boulevard and Clark Avenue (west).

PROJECT DESCRIPTION

The Specific Plan would accommodate a total building area of about 3.7 million square feet in four planning phases. Three phases would be developed by Ezralow retail properties and Kaiser Foundation Hospitals will develop the fourth. The Ezralow portion of the development would encompass approximately 141 acres consisting of retail shopping center (Area 1), motion picture studio or technology park (75 acres) and office park (32 acres). Proposed land uses include commercial retail (410,000 square feet), technology and business park and motion picture production (1.625 million square feet). The Kaiser portion would comprise of a 20-acre portion consisting of 1.6 million square feet of buildings (hospital and medical office uses), and structured parking.

Upon review of the Draft Environmental Impact Report prepared for this project, we have identified deficiencies in the areas of aesthetics, transportation and traffic, and socio-economic impacts. In the area of aesthetics, the lack of identifiable design features that could mitigate any light and glare impacts are worrisome, and we are concerned about the compatibility of this proposed project with surrounding land uses as certain impacts remain significant and unavoidable even after mitigation in some cases.

AESTHETICS

The Draft EIR identified project impacts related to lighting as significant and unavoidable. Impacts 3.1.1 and 3.1.2 of the Draft EIR state that the proposed EzraLow and Kaiser projects would introduce substantial sources of nighttime light and glare and would contribute to the exposure of residential areas in the City to increased nighttime light and glare intensities. The residential land uses located on Stuart and Gray Road, Lakewood Boulevard and Bellflower Boulevard are potentially subject to this impact. Mitigation Measure 3.1.7 states that no feasible mitigation measures would reduce the light and glare impacts to less than significant levels. The City of Downey proposes to issue a statement of overriding consideration for this impact since the impacts would remain significant and unavoidable at project implementation.

- 2

The lack of any identified specific mitigation measures in the EIR to serve as a guide is worrisome. This creates an environment where the nighttime light and glare impacts could be left unregulated even at the project implementation stage. It is recommended that the EIR at least identify "typical" code requirements designed to regulate light intensities or the spillage of light from one property to another. This would provide a point of reference and a targeted attainment level. On the other hand, one could question whether a project whose nighttime light and glare impacts are unavoidable and significant is desirable for the location and compatible with surrounding residential land uses. We believe that measurable impacts such as light and glare should be reduced to a less than significant level because they create quality of life problems for the City's residents upon project implementation. Our fear is that at that stage, enough would have been invested in the project that it may be infeasible to retrofit any identified negative impacts that cannot be mitigated to a less than significant level.

The EIR or project conditions of approval need to identify potential mitigation measures that would be used to measure project compliance. We believe that project conditions of approval may be ineffective when the environmental document approving the project does not recognize feasible mitigation measures that would reduce the impact of nighttime light and glare to a less than significant level.

TRANSPORTATION AND TRAFFIC

The City of Downey General Plan indicates that a project would have a significant roadway impact if the project causes a decrease from LOS "A", "B", "C", or "D" to LOS "E" or "F" at an affected intersection. The Downey General Plan also indicates that a project would have a significant roadway impact if the project causes an increase in Intersection Capacity Utilization (ICU) value by 0.02 or more at an intersection operating at LOS "E" or "F".

2-3

With project implementation the EIR identified five intersections that would operate at a Level of Service "E" or worse with an ICU value of 0.90 to more than 1.2. The intersections are: Lakewood Boulevard and Firestone Boulevard; Lakewood Boulevard and Bellflower Boulevard; Lakewood Boulevard and Stuart & Gary; Bellflower Boulevard and Imperial Highway, and Lakewood Boulevard and Imperial Highway. Additionally, The Los Angeles County Congestion Management Plan (CMP) indicates that a project would have a significant freeway impact if the demand/capacity (D/C) ratio increases by 0.02 or more for a facility operating at LOS "F". The proposed project would cause Interstate 105 at the CMP monitoring station intersection to operate at LOS "F".

We do not concur with the assertion that the project meets the City of Downey General Plan Circulation Element Policy 2.1.1, Program 2.1.1.1. Program 2.1.1.1 states that the City shall maintain intersection service levels of major streets at "E" or better, excepting those intersections currently operating at Level of Service "F". The Consistency finding under Program 2.1.1.1 states that "the project is consistent with this program because mitigation measures have been proposed that would improve the level of service at any intersection projected to operate at LOS E or F that would be significantly impacted by the project". The General Plan threshold is LOS "E" or better.

For example, table 3.9-6 of the EIR indicates that the Ezralow development (AM peak hour) would cause the Lakewood/Bellflower intersection to operate from the existing LOS "D" to LOS "E" with project implementation. The Lakewood/Stuart & Gray intersection would operate from the existing LOS "D" to LOS "F", and the Bellflower/Imperial intersection would operate from the existing LOS "E" to LOS "F". These trends are inconsistent with the City's General Plan Circulation Element Policy 2.1.1, Program 2.1.1.1. Table 3.9-7 of the EIR identifies three intersections that, during PM peak hour, would operate at LOS "F" with project implementation. The existing conditions for these intersections are LOS "D" and "E". These findings are not consistent with the City's General Plan policy and if extrapolated, inconsistent with Southern California Area of Governments' (SCAG) Regional Transportation Plan Policy 4.01. The Kaiser Development does not fair any better as identified in tables 3.9-8 and 3.9-9.

More importantly, the Mitigation Measures in Section 3.9.7 of the EIR fail to relate any mitigation measure to an identified negative impact such as an intersection operating at an acceptable LOS level or ICU ratio with project implementation. The EIR should link each mitigation measure to an identified impact and demonstrate how each proposed mitigation measure reduces the identified impact to a less than significant level.

Parking for Retail Component

The Institute of Transportation Engineers (ITE) has a land use category identified as Free-Standing Discount Stores (FSDS). The ITE manual classifies a FSDS as a freestanding store with off-street parking that offer a variety of customer services, centralized cashiering and a wide range of products. These stores typically maintain long store hours seven days a week. The stores could be the only ones on the site, but they also can be found in mutual operation with a related or unrelated garden center or service center. The ITE manual further illustrates that FSDS are sometimes found as separate parcels within a retail complex with their own dedicated parking.

The ITE Sixth Edition Free Standing Discount Store trip generation rate is 56.63 trips per day per 1,000 square feet of building area. However, from the analysis provided in the EIR, it is unclear what trip generation rate or parking ratio was used for the big box portion of the Ezralow Development. Based on published studies, using the Free-Standing Discount Store trip rate typically results in a 32 percent increase in trip rate and parking requirement compared to a shopping center parking requirement. It also results in a substantial increase in the transportation/circulation impacts and an increase in the associated emissions (Air Quality) and aesthetics (light and glare) impacts assumed for the development.

The EIR should clarify the methodology used to arrive at the required parking for this development and defend why the FSDS trip generation rate and parking standard was not used in this instance.

BLIGHTING IMPACTS

The California Environmental Quality Act (CEQA) Section 15131(b) indicates that economic or social effects of a project may be used to determine the significance of physical changes caused by the project.

The question becomes more critical in light of the documented blighting effects of big box retail outlets on local communities. A report titled "The Impact of Big Box Grocers on Southern California: Jobs, Wages, and Municipal Finances" prepared for the Orange County Business Council by professor Marion Boardet of the University of California at Irvine, and professor Randall Crane of the University of California at Los Angeles, made the following key findings:

- a. The fiscal benefits of superstores, and of discount retail more generally, are often much more complex, and lower, than they first appear. This is particularly true when big box retailers close existing stores to move into larger quarters elsewhere, when they expand an existing store to include food service, and when retailers reconfigure an existing store to

sell food without expansion. In each case, additional tax revenues generated will in part come from existing businesses elsewhere in the city in the form of lost market share.

- b. The aggressive entry of superstores into the regional grocery business is expected to depress industry wages and benefits. This impact is estimated at ranging from a low of \$500,000 to a high of almost \$1.4 billion per year, potentially affecting 250,000 grocery industry employees.
- c. The full economic impact of those lost wages and benefits throughout southern California could approach \$2.8 billion per year.
- d. Discount retail chains that operate superstores typically offer much less comprehensive health care coverage than major California grocery chains. One major economic impact of Superstores could be a dramatic reduction in health coverage for most of the 250,000 grocery employees in California. This can lead to lower quality care for grocery employees whose health insurance benefits are reduced.
- e. Superstores are often conversions of existing discount retail stores. Local officials should consider the possibility of a future conversion to a superstore, and any attendant negative economic, fiscal, or land use impacts, when approving big box discount retail projects.

Another report, titled "The Shils Report: Measuring The Economic and Sociological Impacts of The Mega-Retail Discount Chains on Small Enterprise in Urban, Suburban and Rural Communities" concluded that in exchange for one new part-time job in a mega-discount chain store, about one and one-half full time jobs were eliminated in smaller stores. This report was prepared by Professor Edward B. Shils and Emeritus Professor of entrepreneurial studies, George W. Taylor of the Wharton School, University of Pennsylvania. The cumulative effects of closures of small businesses and loss of full time jobs have resulted in significant blighting effects in communities where these studies have taken place. Under CEQA, these documented blighting effects constitute physical changes to the environment. Therefore, the blighting effect of big box retail outlets on local economies should be analyzed and included in the EIR.

ALTERNATIVES

L- 6 Although declared infeasible for economic reasons, the Reduced Scale Alternative would eliminate some or most of the significant and unavoidable environmental impacts. However, the EIR did not analyze the specifics of the Reduced Scale Alternative and did not provide any details. It would have been interesting to see amount of reduction in the project intensity would have made the development more environmentally friendly and eliminate the proposed findings of a statement of overriding consideration. The "No project/No development" alternative is not an adequate comparison to a development whose impacts on the environment could be reduced with reduced building intensities or alternative land uses.

An alternative land use analysis or a reduced intensity analysis should be included in the EIR to clearly show how a different mix of development or reallocation of land uses or both would produce a more environmentally friendly project.

COMPATIBILITY

L- 7 Civic Solutions Inc. supports the City of Downey in its efforts to redevelop the project site and applauds the goals that have been established for developing the site. However, we are not convinced that this site is most suited for commercial uses since the land use history of the site to date does not include the types of commercial uses proposed. The proximity of the site to residential development makes the proposed high-volume development incompatible with the surrounding residential land uses. Portions of the site may be more suitable for uses that generate lower trip rates, less traffic volumes, and reduced noise, light, glare, trash and shopping carts. The EIR should strongly consider, adequately analyze, and sufficiently mitigate

construction traffic noise and air quality impacts and the development on surrounding residential land uses. These impacts are long term impacts based on project phasing and the construction schedule.

8 Because of the number of parking spaces proposed and the need for parking lot lighting, the developer and the City should ensure that parking lot lights do not spill over to surrounding residential developments. At the same time, use of alternative site planning principles would insure that vehicular loading and unloading areas are oriented away and buffered from residential land uses. The buffering may consist of landscape berming, walls, or a combination of both elements.

CONCLUSION

9 The EIR has identified some issues that have been mitigated with identified mitigation measures but some issues such as light and glare, transportation and traffic, and socio-economic impacts have not been adequately addressed or mitigated. We support the development of this site and the efforts of the City of Downey to bring economic vitality back to the project site. It is our hope that our comments lead to an improved project and a well-informed decision by the City of Downey.

Sincerely,
CIVIC SOLUTIONS INC.



Gabriel Elliott
Senior Project Manager

Letter from Harlan R. Jeche, Department of Toxic Substances Control,
August 20, 2001

- Response to Comment 1-1:** Comment noted.
- Response to Comment 1-2:** Comment noted. See Response to Comment 10-1 through 10-13.
- Response to Comment 1-3:** Comment noted. See Response to Comment 10-1 through 10-13.
- Response to Comment 1-4:** Mitigation Measure 3.3-2 on page 3.3-18 of the Draft EIR requires the formulation a plan to be implemented in the event of the exposure of potentially contaminated soils during grading or excavation activities. The mitigation measure identifies the Los Angeles RWQCB as the government agency that would provide appropriate regulatory oversight. Further, Draft EIR Mitigation Measure 3.3-2 provides a basic mechanism for the implementation of appropriate procedures in the event of such a discovery. At a minimum, the following must occur:
- All work in the vicinity of the affected area shall cease.
 - The Los Angeles RWQCB shall be contacted.
 - The appropriate California Health and Safety Code procedures shall be followed.
- In response to this comment, the mitigation measure shall be modified as follows:
- "At a minimum, the plan shall identify the RWQCB as a responsible agency, and shall include the following specific points:
- A qualified construction monitor shall be designated and shall be present on-site during grading and excavation activity.
 - The construction monitor shall be responsible for identifying pockets of potentially contaminated soils, and, upon identification of potential contaminants, for implementing the procedures outlined in the plan.
 - All work in the vicinity of the affected area shall cease.
 - The Los Angeles RWQCB shall be contacted.

- The appropriate California Health and Safety Code procedures shall be followed."

Note that Draft EIR Impact 3.3-1 on page 3.3-12 discusses the potential for contaminants on site that have not been identified by soil and ground water surveys conducted to date. Because the presence and nature of such contaminants is hypothetical, no remediation method can be specified at this time. Consequently, Draft EIR Mitigation Measure 3.3-2 requires the formulation of appropriate remediation procedures in consultation with the RWQCB.

Response to Comment 1-5: Refer to response to comment 1 -4 for a discussion of the procedures to be followed if suspected soil contamination is encountered on the project site during grading and excavation activities.

Response to Comment 1-6: Comment noted.

State Clearinghouse Stamped Notice of Completion and Environmental Transmittal Form, August 1, 2001

Response to Comment 2-1: Comment noted.

Letter from Douglas Gray, Ezralow Retail Properties, (now called Downey Landing, LLC), August 30, 2001

Response to Comment 3-1: In response to this comment, the text on page 3.1 -5 of the Draft EIR shall be modified as follows:

"Landscaping along the northern boundary is proposed to help diffuse this light, as well as an approximately three-foot earthen berm wall along the northern perimeter of Area I, a six-foot wall on the eastern perimeter, and landscaping along the western perimeter."

Response to Comment 3-2: In response to this comment, Mitigation Measure 3.2 -4 on page 3.2-17 of the Draft EIR shall remain as follows:

"All new structures on the site shall have wall and attic insulation that exceeds current Title 24 requirements by at least five (5) percent."

All new projects within the state are required to comply with the provisions of Title 24 that are in effect at the time of development. These are minimum provisions necessary to meet current energy standards. However, in their CEQA Air Quality Handbook, the South Coast Air Quality Management District recommends that new development projects that result in significant daily air pollution emissions mitigate this impact by, amongst other things, exceeding Title 24 requirements. Although no specific target is recommended by the SCAQMD, they have reviewed EIRs for other projects that recommended exceeding Title 24 requirements by at least ten percent. Many projects have been constructed with this specification; it is feasible to implement such a mitigation measure. Because the current provisions of Title 24 are successful at minimizing energy demand, the City of Downey is recommending a five percent improvement for the proposed project.

Response to Comment 3-3:

In response to this comment, Mitigation Measures 3.9 -1 through 3.9-7 on pages 3.9-24 through 3.9-25 of the Draft EIR shall be modified as follows:

"Provide a Second Northbound -to-Westbound Left-Turn Lane on Lakewood Boulevard at the Lakewood/Firestone Intersection, -OR- Provide Right-Turn Lanes in the Northbound, Southbound, and Eastbound Directions and Double Left-Turn Lanes in the Eastbound and Westbound Directions, as feasible within existing right-of-way. If this mitigation measure is deemed infeasible (i.e., it could not be completed within existing right-of-way), project applicant shall contribute to a fair-share funding program administered by the City of Downey to be applied as a partial payment of the roadway improvement or traffic signal coordination system that the City may ultimately install at this location.

"Provide an Additional Northbound Through Lane on Lakewood Boulevard at the Lakewood/Bellflower Intersection, as feasible within existing right-of-way. If this mitigation measure is deemed infeasible (i.e., it could not be completed within existing right-of-way), project applicant shall contribute to a fair-share funding program administered by the City of Downey to be applied

as a partial payment of the roadway improvement or traffic signal coordination system that the City may ultimately install at this location.

"Provide an Additional Northbound and Southbound Through Lane on Lakewood Boulevard at the Lakewood/Stewart & Gray Intersection, as feasible within existing right-of-way. If this mitigation measure is deemed infeasible (i.e., it could not be completed within existing right-of-way), project applicant shall contribute to a fair-share funding program administered by the City of Downey to be applied as a partial payment of the roadway improvement or traffic signal coordination system that the City may ultimately install at this location.

"Provide an Additional Westbound-to-Southbound Left-Turn Lane on Imperial Highway at the Lakewood/Imperial Intersection, as feasible within existing right-of-way. If this mitigation measure is deemed infeasible (i.e., it could not be completed within existing right-of-way), project applicant shall contribute to a fair-share funding program administered by the City of Downey to be applied as a partial payment of the roadway improvement or traffic signal coordination system that the City may ultimately install at this location.

"Provide an Eastbound-to-Southbound Right-Turn Lane on Imperial Highway at the Imperial/Bellflower Intersection, as feasible within existing right-of-way. If this mitigation measure is deemed infeasible (i.e., it could not be completed within existing right-of-way), project applicant shall contribute to a fair-share funding program administered by the City of Downey to be applied as a partial payment of the roadway improvement or traffic signal coordination system that the City may ultimately install at this location.

"Provide a Southbound-to-westbound Right-Turn Lane on Bellflower Boulevard at the Bellflower/Stewart & Gray Intersection, as feasible within existing right-of-way. If this mitigation measure is deemed infeasible (i.e., it could not be completed within existing right-of-way), project applicant shall contribute to a fair-share funding program administered by the City of Downey to be applied as a partial payment of the roadway improvement or traffic signal coordination system that the City may ultimately install at this location.

"Prepare a Phased Mitigation Plan to link the specific mitigation measures (Measures 3.9-1 through 3.9-6) with the various levels and/or combinations of

development that are anticipated for the development, as feasible within existing right-of-way. If this mitigation measure is deemed infeasible (i.e., it could not be completed within existing right-of-way), project applicant shall contribute to a fair-share funding program administered by the City of Downey to be applied as a partial payment of the roadway improvement or traffic signal coordination system that the City may ultimately install at these locations.

Response to Comment 3-4: Comment noted.

Letter from James A. Noyes, Department of Public Works, August 27, 2001

Response to Comment 4-1: Comment noted.

Response to Comment 4-2: Mitigation Measures 3.9-1 through 3.9-7 of the Draft EIR are proposed to mitigate the project's traffic impacts. The State of California Department of Transportation has had the opportunity to comment, and a comment letter has been provided for their response. In addition, Lakewood Blvd., formerly State Route 19, was recently relinquished to the City of Downey.

Response to Comment 4-3: The Initial Study addressed conforming to requirements of the State of California Division of Mines and Geology Special Publication 117. The City of Downey requires that liquefaction analysis be submitted as part of the plancheck process. The liquefaction report must be submitted to the City Building and Safety Division along with construction drawings.

Response to Comment 4-4: Comment noted.

Response to Comment 4-5: Notices of Completion of the Draft EIR have been sent to adjoining cities as well as the State of California Department of Transportation. These agencies all have the opportunity to review the Draft EIR.

Response to Comment 4-6:

The City of Downey has participated in the review of the Los Angeles/San Gabriel River Watershed Plan. They are aware of the water sheets and connecting open green spaces for the area.

The Specific Plan landscape design maximizes green space (or greenbelts) on the entire site in order to maintain water on -site.

The Department of Public Works has reviewed the proposed project in light of maximizing capture of local rainfall on the project site, minimizing or eliminating incremental flows to the storm drain system, and providing filtering of flows to capture contaminants originating from the project site.

Letter from Laura J. Simonek, Metropolitan Water District of Southern California, August 2, 2001

Response to Comment 5-1:

Comment noted.

Response to Comment 5-2:

Comment noted. Comment noted. In order to avoid potential conflicts with Metropolitan's rights -of-way, the applicant shall submit any preliminary engineering design drawings or improvement plans for any activity in the area of Metropolitan's pipelines and rights -of-ways to the Metropolitan Water District of Southern California for review and written approval.

Response to Comment 5-3:

See comment 5-2 for response.

Response to Comment 5-4:

The Draft EIR analyzed the consistency of the proposed project with the growth management plan adopted by the Southern California Association of Governments in Sections 3.5 (Land Use and Planning), page 3.5-6, 3.7 (Population and Housing), page 3.7-8, and 3.9 (Transportation and Traffic), page 3.9-5. The Draft EIR analyzed policies provided by SCAG and to the satisfaction of SCAG in terms of project consistency with these policies.

Policy 3.01 states, "The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review." Refer to letter attached here within from SCAG. The

consistency discussion with Policy 3.01 on page 3.7 -8 of the Draft EIR particularly addresses growth management concerns. This discussion is summarized as follows:

SCAG's projections show that capacity exists for additional employment opportunities, while still maintaining a balance with existing housing. In addition to SCAG's projections for the City, the proposed project is consistent with the projected growth in jobs in the Gateway Cities Subregion. Further, SCAG's population forecasts for the City of Downey are significantly lower than the actual Census 2000 counts, which exceed SCAG's projected population for the City at 2010, and closely approach SCAG's 2015 projection for the City.

Response to Comment 5-5:

Comment noted. The Draft EIR includes several mitigation measures intended to reduce water consumption on the project site. These include Mitigation Measure 3.8-1, which requires the installation of ultra low-flush toilets, water conserving washing machines, faucets, and dishwashers, and other appropriate water conserving appliances or devices as appropriate. In addition, Mitigation Measure 3.4-3 requires preparation of a Stormwater Pollution Prevention Plan and a Standard Urban Stormwater Mitigation Plan that incorporate Best Management Practices such as efficient irrigation practices.

Response to Comment 5-6:

These closing comments are noted.

*Letter from Stephen Buswell, The State of California Department of Transportation,
August 29, 2001*

Response to Comment 6-1:

Comment noted.

Response to Comment 6-2:

The DEIR traffic analysis indicates that the traffic generated by the proposed development would have a significant impact on the I-105 Freeway according to the CMP significance criteria because the freeway operates at level of service F and the project would result in an increase of greater than 0.02 in the demand/capacity ratio. There are no current plans, however, for increasing the capacity of the I-105 Freeway and there are no feasible mitigation measures for alleviating

the project's impacts. The DEIR indicates, therefore, that the project's impacts on the mainline freeway would be unavoidable and that a statement of overriding considerations would be recommended for adoption by the City of Downey

Response to Comment 6-3: It has been recommended that the City of Downey implement a fair-share funding program to allocate the costs of the required roadway improvements to the various components of the project. Such a program would not, however, be applicable to the mainline I-105 Freeway because no feasible mitigation measures or improvements are identified in the DEIR. If any work is conducted within the State right-of-way, an encroachment permit would be obtained, and it is acknowledged that Lakewood Boulevard is no longer a State highway.

Response to Comment 6-4: See response to comment 6-3.

Response to Comment 6-5: The recommendation by Caltrans to limit construction related truck trips to off-peak periods on State highways has been noted and contractors will be encouraged to adopt this policy. It will not, however, be a required EIR mitigation measure.

Letter from Jeffrey M. Smith, Southern California Association of Governments, September 7, 2001

Response to Comment 7-1: Comment noted.

Response to Comment 7-2: Comment noted.

Response to Comment 7-3: Comment noted.

Response to Comment 7-4: Comment noted.

Letter from Nancy Burke, Kaiser Permanente, September 13, 2001

- Response to Comment 8-1:** Comment noted.
- Response to Comment 8-2:** Comment noted.
- Response to Comment 8-3:** The Final EIR confirms that the development of the Kaiser project at the alternate location (the approximately 30 acre Downey Landing L.L.C. Area III site fronting Imperial Highway) would not result in any additional impacts and is consistent with the policy objectives of the Specific Plan.
- Response to Comment 8-4:** Comment noted.
- Response to Comment 8-5:** In response to this comment, the text on page 1-2, specifically the Kaiser portion, of the Draft EIR shall be modified to include the following:
- "Impact analysis for the Kaiser portion of the proposed project was based on a development envelope of 1.6 million square feet of development (1,000,000 square feet of hospital and medical office facilities and 600,000 square feet of parking structure) in structures up to 8 stories tall."
- Response to Comment 8-6:** In response to this comment, the text on page 1-5 of the Draft EIR shall be modified to include the following:
- "A Program EIR can also provide project level review for a portion of the project. The Kaiser project has been analyzed at a project level."
- Response to Comment 8-7:** The description of the Kaiser project in Section 2.5.1 (Project Characteristics) is consistent with the Kaiser portion of Section 1.1 (Overview of the Proposed Project). In addition, any changes that might be made to Section 1.1 will be included in the corresponding Kaiser portion of Section 2.5.1.
- Response to Comment 8-8:** In response to this comment, the text on page 2-8 of the Draft EIR shall be modified as follows:
- "Note that the current phasing scheme is tentative; however, the combination and progression of uses developed would not exceed 1.6

million square feet, and phasing variations would not materially affect the analysis of the Kaiser project in this EIR.”

Response to Comment 8-9:

In response to this comment, an additional bullet under Section 2.5.3 City of Downey Requested Approvals on page 2 -8 of the Draft EIR shall be added to include the following:

- “Rezoning of the Specific Plan area”

Response to Comment 8-10:

The General Plan does not contain any height restrictions, yet the applicable Specific Plan for the site does. The proposed building heights, as specified in the Downey Landing Draft Specific Plan Guidelines, are within the range of building heights currently on the site. Both market conditions and the character of the surrounding built environment preclude high -rise structures.

Within the Kaiser Medical Center will be several mid -rise structures including an eight-story hospital, a six-story medical office building and a six-story parking structure.

Building height guidelines for the Kaiser medical center include:

New buildings - Maximum of 160' in height.

Parking Structures - Maximum of 60' in height

Auxiliary Buildings - Maximum of 50' in height

Architectural features and landscape structures - Maximum of 40' in height

Even if height restrictions did not exist for the project site, this would have no bearing on whether it has an aesthetic impact. It was determined that the Kaiser medical center's eight story hospital would not result in significant adverse aesthetic impacts due to building height.

Response to Comment 8-11:

Mitigation Measures 3.2-1 and 3.2-2 would reduce the impacts of construction-related emissions of PM10 to a less than significant level but not those of NOx (oxides of nitrogen). Therefore, oxides of nitrogen would indeed remain significant and unavoidable. In response to this comment the last paragraph of Impact 3.2 -1, page 3.2-12 of the Draft EIR, shall be modified as follows:

"Implementation of the identified mitigation (Mitigation Measures 3.2 -1 and 3.2-2) would reduce the impacts of construction -related emissions of NOx and PM₁₀. ~~but not~~ However, these measures would

not be capable of reducing the impacts of NOx. to levels that would be considered less than significant, and impacts resulting from construction-related emissions would remain significant and unavoidable."

Response to Comment 8-12:

Impact 3.3-1 does not speculate about language that conveyance documents may include. Rather, a general discussion of the types of requirements that would be included in the documents is intended to provide the context under which the impact was evaluated and the mitigation measures formulated.

Response to Comment 8-13:

The FAR for the proposed project would be 0.43. This was evaluated as a general floor area ratio across projects, the project envelope, within the Draft EIR. Therefore, there is not a need to discuss the individual FAR for the Kaiser portion of the project within the consistency discussion. Furthermore, the Draft EIR states that the City determined that this reduced FAR of .43 is acceptable for the proposed uses and would not be inconsistent with the General Plan.

Response to Comment 8-14:

Refer to Response to Comment 8-13.

Response to Comment 8-15:

In response to this comment, the discussion of project consistency with Policy 3.12 on page 3.5-7 of the Draft EIR will be modified to include the following:

"In addition, Kaiser's Kaiserider program will assist in reducing the number of auto trips and vehicle miles traveled."

Response to Comment 8-16:

The school fee rate is determined by State Law; however, the exact amount to be paid is not specified. Written agreement allows the project to proceed prior to payment being made.

In response to this comment, Mitigation Measure 3.8 -12 on page 3.8-26 of the Draft EIR shall be modified as follows:

"Prior to issuance of building permits, the applicants shall ~~have entered into a written mitigation agreement with~~ pay the School District ~~which shall require payment of school fees~~ all required school fees."

Response to Comment 8-17:

Kaiser would create a need for additional police services through its daily increase of daytime population in the City of Downey as a result of added employees, patients, and visitors. Attached here within is a

report of conversation with Downey Police Department to refer to in regarding this matter.

Response to Comment 8-18: Please refer to response to comments regarding the letter from Linscott Law & Greenspan, Kaiser's traffic consultants.

Response to Comment 8-19: Comment noted.

*Letter from Jack M. Greenspan, Linscott, Law & Greenspan, Engineers,
September 11, 2001*

Response to Comment 9-1: The Trip Generation manual (Institute of Transportation Engineers, 6th Addition, 1997) was the source of the data used for estimating the volumes of traffic that would be generated by the proposed development components, and there are two categories of equations in this manual that can be used to calculate the traffic volumes. One is the average rate (e.g., number of trips per 1,000 square feet of floor area) and the other is a formula that replicates a fitted curve of the representative data points for each particular land use. The average rate was used in the DEIR traffic analysis for estimating the traffic volumes for the proposed Kaiser hospital and medical buildings, which resulted in slightly higher traffic volume estimates as compared to the fitted curve equation. The differences between the two methodologies are shown in the table below. The larger numbers were used for the DEIR traffic analysis to ensure that the impacts of this project were not understated. If the smaller numbers from the fitted curve equation were to be used for the analysis, the conclusions in the DEIR would be the same; i.e. that the Kaiser development would have a significant impact at four intersections during the morning peak hour and two intersections during the afternoon peak hour.

**COMPARISON OF TRIP GENERATION ESTIMATES
AVERAGE RATE VS. FITTED CURVE EQUATION**

Trip Generation Methodology	AM Peak Hour	PM Peak Hour	Daily
DEIR – Average Rate	1,397	1,722	22,450
Fitted Curve Equation	1,329	1,440	21,030
Difference	-68	-282	-1,420
Percent Difference	4.9 %	16.4 %	6.3 %

The differences between the DEIR -estimated traffic volumes and the volumes cited in the comment letter by LL&G also reflect the assumption that there would be a 10 percent reduction in traffic during the morning peak hour, a 20 percent reduction in traffic during the afternoon peak hour, and a 20 percent reduction in daily traffic volumes associated with internal linkages between the office buildings and the medical center. While these assumed percentages appear to be relatively high and cannot be verified with empirical data, the intersection analysis was re-addressed to identify the locations that would be significantly impacted using the reduced traffic volumes cited in the comment. The re-analysis using the reduced volumes results in the same conclusions as shown in the DEIR; i.e. that the Kaiser development would have a significant impact at four intersections during the morning peak hour and two intersections during the afternoon peak hour.

Response to Comment 9-2:

The comment correctly points out that there is a typographical error in the DEIR on page 3.9-9. The equation for average daily traffic for the retail use should be: $\text{Ln}(T) = 0.643 \text{Ln}(X) + 5.866$.

Response to Comment 9-3:

This comment states that the DEIR traffic analysis addresses two options for the Downey Landing L.L.C. component of the project, that a passby reduction was applied to the retail use, and that an internal capture trip reduction was applied to the project as a whole. Comment noted, no further response required.

Response to Comment 9-4:

See response to comment 1 above

Response to Comment 9-5:

Tables 3.9-8 and 3.9-9 of the DEIR indicate that the Kaiser development alone would have a significant impact at four

intersections during the morning peak hour (Lakewood/Firestone, Lakewood/Bellflower, Lakewood/Stewart & Gray, and Bellflower/Imperial) and two intersections during the afternoon peak hour (Lakewood/Imperial and Bellflower/Imperial). The impacts cited in the comment for six intersections during the morning peak hour and four intersections during the afternoon peak hour actually represent the combined impacts of the Downey Landing L.L.C. and Kaiser developments. A re-analysis of the intersections that would be significantly impacted by the Kaiser development using the reduced traffic volumes stated in the comment indicates that the conclusions of the intersection analysis would be the same as that which was presented in the DEIR; i.e., that four intersections would be significantly impacted during the morning peak hour and that two intersections would be significantly impacted during the afternoon peak hour. The ICU values and levels of service for the reduced traffic volume scenario are shown in the table below for the significantly impacted intersections. Similarly, the conclusions of the intersection analysis for the combined Downey Landing L.L.C. and Kaiser developments are unchanged from what was presented in the DEIR.

KAISER DEVELOPMENT IMPACTS – REDUCED TRAFFIC VOLUMES

Intersection	ICU Value – Level of Service				
	Future w/o Project	With Project (from DEIR)	With Project (Reduced Volumes)	Project Impact (Reduced Volumes)	Significant Impact (Reduced Volumes)
AM PEAK HOUR					
Lakewood/Firestone	1.145 – F	1.171 - F	1.167 – F	0.022	Yes
Lakewood/Bellflower	0.891 – D	0.958 - E	0.948 – E	0.057	Yes
Lakewood/Stewart & Gray	0.949 – E	0.982 – E	0.977 – E	0.028	Yes
Bellflower/Imperial	0.990 – E	1.117 - F	1.099 – F	0.109	Yes
PM PEAK HOUR					
Lakewood/Imperial	1.021 – F	1.110 – F	1.080 – F	0.059	Yes
Bellflower/Imperial	0.901 – E	1.016 – F	0.978 – E	0.077	Yes

Response to Comment 9-6:

The comment correctly points out that there is a typographical error in the DEIR text in the discussion of the Kaiser project’s impacts on the I-105 Freeway according to the CMP criteria. The second sentence of the paragraph on page 3.9-20 shall be changed to:

The analysis indicates that the Kaiser project would not have a significant impact at this freeway location according to the CMP guidelines as the locations that operate at LOS F have a project impact ~~greater~~ less than 0.02 during the morning peak hour in the

westbound direction and during the afternoon peak hour in the eastbound direction.

- Response to Comment 9-7:** It is acknowledged that the Kaiser development would most likely implement the Kaiserider ride-share program, which should successfully reduce the volumes of traffic that would be generated by the proposed facility. No further reductions have been incorporated into the traffic volume estimates used for the traffic analysis, however, because it is assumed that ride-share programs were also in use at the facilities that were surveyed while assembling the trip generation data for the Trip Generation manual.
- Response to Comment 9-8:** Comment 8 is a summary of Comments 1 through 7. No additional response is needed because these comments are all addressed above in Responses 1 through 7.
- Response to Comment 9-9:** Comment noted.
- Response to Comment 9-10:** Comment noted.
- Response to Comment 9-11:** Comment noted.
- Response to Comment 9-12:** Comment noted.
- Response to Comment 9-13:** Comment noted.
- Response to Comment 9-14:** Comment noted.
- Response to Comment 9-15:** Comment noted.
- Response to Comment 9-16:** Comment noted.

Letter from Marianne Wetzel, California State Lands Commission,
September 19, 2001

Response to Comment 10-1:

Comment noted.

Response to Comment 10-2:

In response to this comment, the text beginning on page 2 -5, line 13, of the Draft EIR, shall be modified as follows:

"Through the General Services Administration (GSA), The City of Downey has arranged to purchase Parcels 1 and 2 of the NASA plant from the State of California, State Lands Commission who is acquiring the excessed property from the General Services Administration (GSA). Parcels 3, 4, 5, and 6 of the plant have already been purchased by the City, and conveyance of Parcels 1 and 2 to the City is anticipated to occur in Fall 2001-Spring/Summer 2002."

Response to Comment 10-3:

In response to this comment, the last sentence of section 2 -4, page 2-5 of the Draft EIR, shall be modified as follows:

"As further described below, the Specific Plan is the project that this EIR ~~analysis~~ analyzes, pursuant to CEQA."

Response to Comment 10-4:

In response to this comment, the last sentence of the first paragraph, page 3.3-4 of the Draft EIR, shall be modified as follows:

"However, another, unidentified contaminant source may remain. The California Regional Water Quality Control Board (CRWQCB) has identified an isolated contaminated plume of TCE in the groundwater on Parcel 2; however, the source of this contaminant has not been identified (Stewart 2001, pers. comm.)."

Response to Comment 10-5:

In response to this comment, the second sentence of the fourth paragraph, page 3.3-5 of the Draft EIR, shall be modified as follows:

As of August 2001, TEC and tetrachloroethene (PCE) were detected in groundwater beneath Parcel 2. During this sampling episode, TCE ranged in concentration from 26 µg/l to 170 µg/l. PCE ranged in concentration from 8.4 µg/l to 16 µg/l. The concentrations of both PCE and TCE exceeded the State of California Department of Health Services Maximum Contaminant Levels (MCLs) of 5 µg/l for these compounds; however, the groundwater monitoring wells located upgradient from Parcel 1 (which is also upgradient from Parcel 2)

indicate PCE concentrations ranging from <7.5 µg/l to 14 µg/l. TCE concentrations in the upgradient monitoring wells ranged from 120 µg/l to 1,200 µg/l.

- Response to Comment 10-6:** Aboveground and underground storage tanks, if no longer in use, are required by most agencies to be removed and properly closed.
- Response to Comment 10-7:** In response to this comment, the second sentence of the fourth paragraph, page 3.3-6 of the Draft EIR, shall be modified as follows :
- Soils samples collected in the northwestern portion of Parcel 4, near the UST, yielded only low concentrations of fuel hydrocarbons. PCE was detected at concentrations ranging from 6 g/kg to 402 g/kg, and TCE was detected at concentrations ranging from 7 to 113 g/kg. Although other areas that were not sampled may have had greater impacts, SCS's 1998 investigation and previous investigations by Earthtech (1996)...
- Response to Comment 10-8:** Currently, some investigation is being undertaken to define the extent of VOCs in groundwater beneath Parcel 2. This investigation may also further assess VOCs in groundwater beneath Parcel 5. Currently, soil on Parcel 5 is not included in this investigation.
- Response to Comment 10-9:** No additional information regarding the source of TCE in the southwest and northwest portion of Parcel 6 is currently available.
- Response to Comment 10-10:** PCE and 1,1,1, TCA were found in soil samples collected from borings completed to 20 feet below ground surface (bgs). Additionally, TCE, PCE, toluene, trimethylbenzene, and xylenes were found in the same boring at a depth of 40 feet bgs. The concentrations of PCE ranged from 11 to 402 µg/kg, the concentrations of 1,1,1, TCA ranged from , 5 to 48 µg/kg, and xylenes ranged in concentrations from, 5 to 906 µg/kg
- Response to Comment 10-11:** In response to this comment, sentence #1 of the second paragraph, page 3.3-9 of the Draft EIR, shall be modified by adding the following sentence:
- The RWOCB-LA has required additional characterization of groundwater beneath Parcel 2 to more fully assess the extent of the VOCs.

- Response to Comment 10-12:** In response to this comment, sentence #2 of the second paragraph, page 3.3-12 of the Draft EIR, shall be modified as follows
- However, the conveyance agreements currently being formulated by the City, NASA, State Lands Commission, and the Federal General Services Administration will include measures for the...
- Response to Comment 10-13:** In response to this comment, sentence #6 of the second paragraph, page 3.5-2 of the Draft EIR, shall be modified as follows:
- Through the General Services Administration (GSA), the City of Downey arranged ~~to purchase and purchased~~ the property from ~~NASA. Parcels 3, 4, 5, and 6 have already been conveyed to the City, and~~ from NASA. Conveyance of Parcels 1 and 2 to the City from the State Lands Commission is anticipated to occur in ~~Summer or Fall 2001~~ Spring or Summer 2002.
- Response to Comment 10-14:** The initial study, in this case, is a tool used to help determine the scope of environmental impact requiring additional analysis within the EIR. Explanations for each determination are provided within the initial study.
- Response to Comment 10-15:** The city is following standard practice in requiring that a geotechnical report be prepared during project construction plan check.
- Response to Comment 10-16:** As noted on page 29 (section 4.10b) of the Initial Study, the project site has not been delineated as a mineral resource recovery site in the City's General Plan or any other kind of Land Use plan. Therefore a determination of "No Impact" can be made.
- Response to Comment 10-17:** Comment noted.

Letter from Terry Roberts, Governor's Office of Planning and Research,
September 17, 2001

Response to Comment 11-1: Comment noted.

Letter from Gabriel Elliot, Civic Solutions, Inc., December 9, 2001

Response to Comment 12-1: Comment noted.

Response to Comment 12-2: Code requirements (i.e. City of Downey Municipal Code) for regulating light intensities or the spillage of light from one property to another were identified on pages 3.1-2 and 3.1-3 of the Downey Landing Draft EIR and state the following:

"Section 9144.06

Subsection (g) specifies that no operations, activity, or lighting fixture shall create illumination which exceeds five -tenths (.5) foot-candles at any point on the lot lines of the use.

Section 9152.18

Subsection (b) specifies that outdoor lighting shall be arranged so as not to direct light on a ny street or abutting property, and that exposed bulbs are not permitted. Subsection (d) requires approval of lighting intensities by the City Traffic Engineer and City Planner. Subsection (f) forbids, in commercial and manufacturing zones, lighting stru ctures over five feet in height within 20 feet of a public right -of-way (except for car dealerships)."

In addition to these code requirements, compliance with these code requirements was addressed on page 3.1 -3 of the Draft EIR and states the following:

"The project will prevent to the fullest extent possible the direction of light off-site and light spillage onto nearby residential properties. The project will further utilize non -exposed bulbs and obtain approval of all lighting intensities as require d in the Municipal Code. The Downey Landing Specific Plan incorporates the requirements of the Downey Municipal Code as to outdoor lighting. Therefore, the project will therefore comply with the provisions of Sections 9152.18 and 9144.06 of the Downey Municipal Code and their specified subsections."

The proposed project is subject to code compliance; however, not all aesthetic/light and glare impacts can be mitigated to a less than

significant level due to reasons stated under impacts 3.1 -1 and 3.1-2 on pages 3.1-4 through 3.1-7 of the Draft EIR.

Response to Comment 12-3:

The comment cites five intersections that would operate at level of service E or F after project implementation. This observation is valid for the Downey Landing L.L.C. component of the project. For the combined project (Downey Landing L.L.C. and Kaiser), seven intersections are projected to operate at LOS E or F, including the five listed in the comment plus the intersections of Lakewood at the I -105 Ramps and Bellflower at Stewart & Gray. All of these intersections would be significantly impacted by the project except for Lakewood at the I-105 ramps based on the significance criteria outlined in the DEIR. The comment correctly states that the project would have a significant impact on the I-105 Freeway according the CMP criteria cited in the DEIR. The comment also states that the project is not consistent with the General Plan Circulation Element because it changes the level of service to LOS F at several intersections. The levels of service shown in Tables 3.9-6 through 3.9-11 indicate the unmitigated levels of service. The impacts that were identified in the DEIR and the mitigated levels of service are shown in the table below for the combined project. The ICU levels with mitigation are based on the intersection improvements described in Section 3.9.7 for Mitigation Measures 3.9-1 through 3.9-6.

EFFECTS OF PROPOSED MITIGATION MEASURES ON INTERSECTION LEVELS OF SERVICE

Intersection	ICU Value – Level of Service				
	Future Without Project	Future With Project	With Project and Mitigation	Project Impact With Mitigation	Significant Impact After Mitigation
AM PEAK HOUR					
Lakewood/Firestone	1.145 F	1.209 F	1.088 F	- 0.046	No
Lakewood/Bellflower	0.891 D	1.014 F	0.863 D	- 0.028	No
Lakewood/Stewart & Gray	0.949 E	1.077 F	0.960 E	0.011	No
Lakewood/Imperial	0.843 D	0.990 E	0.895 D	0.052	No
Bellflower/Stewart & Gray	0.729 C	0.974 E	0.854 D	0.125	No
Bellflower/Imperial	0.990 E	1.145 F	0.984 E	- 0.006	No
PM PEAK HOUR					
Lakewood/Firestone	1.244 F	1.293 F	1.166 F	- 0.078	No
Lakewood/Stewart & Gray	0.922 E	1.056 F	0.935 E	0.013	No
Lakewood/Imperial	1.021 F	1.072 F	1.018 F	- 0.003	No
Bellflower/Imperial	0.901 E	1.139 F	0.916 E	0.015	No

Response to Comment 12-4:

The land use category of free standing discount store was not used for calculating the volumes of traffic that would be generated by the retail component of the project because the buildings are not free standing and are expected to operate as an integral group of buildings rather than an isolated building, primarily because many customers would patronize multiple uses within the development. With regard to the parking demand for the retail center, the fact that a free standing discount store generates a higher volume of traffic on a daily basis than a typical retail facility does not necessarily indicate that it would have a higher parking demand at any given time. The free standing discount store has a higher trip generation rate because it is typically open for more hours of the day. The peak parking demand does not necessarily correlate with the daily trip generation rate. The retail center, as proposed, would have more parking spaces than what is required by the City of Downey's Municipal Code. The site would not, therefore, be deficient relative to the number of parking spaces provided.

Response to Comment 12-5:

The project would create new opportunity for employment and not cause blighting. The Draft EIR project description makes no reference to the inclusion of big box retail outlets as part of project development. Project objectives stated on pages 2 -3 and 2-4 are the following:

- "Create employment opportunities that will replace the jobs that were lost with the closing of the NA SA facility, with respect to both quantity and quality.
- Increase and diversify the number of retail merchandise opportunities in the community for the purpose of capturing those Downey residents who are shopping elsewhere so as to reduce the City's leakage of sales tax revenue.
- Provide for the development of additional retail businesses so as to enlarge the City's retail trade area and in turn strengthen its economic base.
- Enhance the visual character of the project site, which in turn will help to strengthen the image of the community."

Therefore, economic and social effect of the project will be positive with creation of employment opportunity, diversifying retail opportunities, strengthening the City's economic base, and enhancing the area's visual character. All these project attributes actually combat the effects of blight. In addition, retail uses will be in conformance with the guidelines specified in the Specific Plan and the General Plan, and no blighting would result from these uses.

Response to Comment 12-6:

The project provides a building envelope of maximum scale development. Many alternative land use mixes were considered including a reduced scale alternative addressed on page 4 -5 of the Draft EIR. This alternative was found to be infeasible, though, because it would not meet the basic project objectives. Project applicant Downey Landing L.L.C. Retail Properties has indicated that due to purchase and lease prices, it is economically infeasible to reduce the project size and still support the project by potential revenues. A reduced alternative would be economically infeasible for project applicant Kaiser to construct hospital facility of sufficient capacity to accommodate the needs of its membership. In addition, alternative sites were also considered and found to be infeasible, while the no project/no development alternative would not meet basic project objectives, nor would it constitute the highest and best use of the site.

Response to Comment 12-7:

The Draft EIR addresses the issue of compatibility with surrounding land uses. Low to medium residential, neighborhood commercial, commercial manufacturing, medical office, county office, and educational uses surround the project site and are compatible with the commercial retail, hospital, and medical office uses that are proposed. As stated on page 2-3 of the project description, the entire project site is designated in the General Plan Land Use Diagram as Mixed -use, which allows commercial and manufacturing uses, or a combination of them. Hospitals and medical facilities are commercial uses, or are otherwise consistent with "combination of commercial/manufacturing uses." The zoning designation for the project site is General Manufacturing (M2), with Parking Buffer (P -B) on the perimeter of the site along Clark Avenue, Imperial Highway, and Stewart & Gray Road. In addition, the Draft EIR adequately analyzed and sufficiently mitigated construction traffic noise and air quality impacts of the proposed development in terms of surrounding residential land uses.

In addition, the Draft Specific Plan provides specific guidelines for development of the site. The Specific Plan allows for flexibility in land use development, including, but not limited to commercial uses. These land uses will be influenced by market condition, as in most new development.

Response to Comment 12-8:

As discussed on pages 3.1-4 through 3.1-7, the lighting provisions in Section 9152 of the Downey Municipal Code would prevent the direction of light off-site, particularly with respect to the lighting fixtures that would be used in the parking areas of Area I and the lighting fixtures that would be used in the parking areas of the Kaiser facility and would reduce glare impacts and corresponding light spillage onto nearby residential uses. Downey Landing LLC plans full -intensity lighting of Area I for security reasons, therefore, no feasible measures

would significantly reduce the increase in ambient lighting on the project site. The Draft EIR states that light and glare buffering from residential land uses will consist of walls and landscaped earthen berm along the perimeters, preventing significant amounts of spillage of light onto adjacent properties. However, no mitigation measures are available that would significantly reduce the potential for the direction of vehicle headlights onto residential uses along Stewart & Gray Road, Lakewood Boulevard, and Bellflower Boulevard.

Response to Comment 12-9:

Issues associated with light and glare, transportation and traffic, and socio-economic impacts have been adequately addressed in the Draft EIR. Refer to the responses to comments above.