
IV. RESPONSES TO COMMENTS ON THE DRAFT EIR

COMMENTERS

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2. State of California Department of Toxic Substances Control
School Property Evaluation and Cleanup Division
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3. State of California Native American Heritage Commission
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4. State of California Department of Transportation
District 7, Office of Public Transportation and Regional Planning
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5. City of Santa Monica
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RESPONSES TO DRAFT EIR COMMENT LETTERS

COMMENT LETTER No.1

State of California, Governor's Office of Planning and Research
State Clearinghouse and Planning Unit
Terry Roberts, Director
1400 Tenth Street, P.O. Box 3044
Sacramento, CA 95812
November 14, 2006

Comment No. 1.1

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 November 13, 2006, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Response No. 1.1

This comment acknowledges the Lead Agency has satisfied the CEQA requirements with respect to distributing the EIR to state agencies for the 45-day public review period. No response is required.

COMMENT LETTER No. 2

State of California, Department of Toxic Substances Control
Maureen F. Gorsen, Director
1011 North Grandview Avenue
Glendale, CA 91201
October 10, 2006

Comment No. 2.1

The Department of Toxic Substances Control (DTSC) has reviewed the Notice of Preparation (NOP), dated September 26, 2005, for the subject project. Although the due date to submit comments was October 25, 2005, DTSC would like to provide the following comment:

1. If demolitions of old structures will occur, lead based paint and organochlorine pesticides from termiticides may be potential environmental concerns at the site. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with DTSC's *"Interim Guidance, Evaluation of School Sites with Potential Soil Contamination as a Result of Lead From Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers, dated June 9, 2006."*

If you would like to discuss this matter further, please contact Ms. Andrea Juarez at (714) 484-5340 or me at (818) 551-2860.

Response No. 2.1

The Draft EIR included a thorough evaluation of the existing East Building including asbestos and lead based paint investigations and includes mitigation measures to ensure potential impacts related to demolition activities are abated in accordance with all applicable laws and regulations. While no evidence of soil contamination as a result of lead from lead based paint, organochlorine pesticides from termiticides, or polychlorinated biphenyls from electrical transformers was discovered, Section IV.D (Hazards and Hazardous Materials) of the Draft EIR includes mitigation to ensure the removal of any asbestos and lead-based paint in the East Building prior to demolition. In addition, Section III (Corrections and Additions to the Draft EIR) of the Final EIR includes the following new mitigation measure to further ensure that potential impacts related to exposure of organochlorine pesticides from termiticides during demolition of the East Building are mitigated to less than significant levels:

(D-4) Prior to demolition of the existing East Building, environmental concerns related to organochlorine pesticides from termiticides shall be investigated and, if necessary, mitigated, in accordance with Department of Toxic Substances Control's (DTSC) Interim Guidance, Evaluation of School Sites with Potential Soil Contamination as a Result of Lead From Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers, dated June 9, 2006.

This addition does not change any findings or conclusions contained within the Draft EIR.

COMMENT LETTER No. 3

State of California, Native American Heritage Commission
Dave Singleton, Program Analyst
915 Capitol Mall, Room 364
Sacramento, CA 95814
E-mail: ds_nahc@pacbell.net
November 3, 2006

Comment No. 3.1

Thank you for the opportunity to comment on the above-referenced document. The Native American Heritage Commission is the state's Trustee Agency for Native American Cultural Resources. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR per CEQA guidelines § 15064.5(b)(c)). In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

✓ Contact the appropriate California Historic Resources Information Center (CHRIS). The record search will determine:

- If a part or the entire APE has been previously surveyed for cultural resources.
- If any known cultural resources have already been recorded in or adjacent to the APE.
- If the probability is low, moderate, or high that cultural resources are located in the APE.
- If a survey is required to determine whether previously unrecorded cultural resources are present.

✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.

- The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.

- The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.

✓ Contact the Native American Heritage Commission (NAHC) for:

- * A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity who may have additional cultural resource information. Please provide this office with the following citation format to assist with the Sacred Lands File search request: USGS 7.5-minute quadrangle citation with name, township, range and section.

- The NAHC advises the use of Native American Monitors to ensure proper identification and care given cultural resources that may be discovered. The NAHC recommends that contact be made with Native American Contacts on the attached list to get their input on potential project impact, particularly the contacts of the on the list.

✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.

- Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.

- Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

✓ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.

- * CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the Initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

✓ Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the CEQA Guidelines mandate procedures to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

✓ Lead agencies should consider avoidance, as defined in §15370 of the CEQA Guidelines, when significant cultural resources are discovered during the course of project planning.

Response No. 3.1

The above letter provides general guidance on evaluating and mitigating potential impacts upon Native American burial sites and cultural resources pursuant to CEQA regulations. The Proposed Site is a developed campus and has been subject to extensive earthwork activities in the past. There is no evidence that any Native American or other significant or sensitive cultural resources are present on the Project Site. Nevertheless, guidance and preventative measures similar to those recommended above and as required by law, will be incorporated in to the construction work orders to ensure the proper procedures are followed in the unlikely event cultural, paleontological or archaeological remains are uncovered during the construction process.

COMMENT LETTER No. 4

State of California, Department of Transportation
District 7, Office of Public Transportation and Regional Planning
IGR/CEQA Branch
Cheryl J. Powell, IGR/CEQA Program Manager
100 South Main Street
Los Angeles, CA 90012
November 30, 2006

Comment No. 4.1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed program-level document. Based on the information received, we have the following comments:

The net increase in average daily trips (ADT) to the Bundy Campus is anticipated to be approximately 2877 ADT, with 121 trips occurring during the AM peak hour and 203 trips occurring during the PM peak hour. On Page 17 and Figure 4, Page 44, the trip distribution assigns 32 PM peak hour project trips to northbound 1-405 Freeway and 53 PM peak hour project trips to eastbound 1-10 Freeway. We would like to mention that both of these freeway facilities currently operate at poor level-of-service (LOS) conditions, LOS F for northbound 1-405 and eastbound 1-10 during the PM peak period. LOS is a measurement of operating conditions with LOS F conditions indicating that traffic is flowing at less than 35 MPH and LOS F-1 indicates that congestion lasts for 1 hour, LOS F-2 indicates that congestion lasts for 2 hours and LOS F-3 indicates that congestion lasts for 3 hours. Furthermore, the cumulative project plus related project trips will add more traffic on these already congested freeway facilities.

There are No 1-10 Freeway improvements projects scheduled for the near term. 1-405 Freeway improvements project is currently being studied.

If you have any questions, you may reach me at (213) 897-3747 and please refer to our record number 061002/CS.

Response No. 4.1

The comment provides the definitions of freeway levels of service based on travel speeds and duration of congestion, noting that northbound I-405 and eastbound I-10 are at LOS F. While the comment correctly states the estimated trip generation of the Proposed Project, as a point of clarification, it misstates the amount of p.m. peak hour project traffic assigned to northbound I-405 and to eastbound I-10 as 32 and 53 trips, respectively. Table 47 of Appendix G to the Draft EIR shows that the directional traffic assigned to these two facilities is 41 and 35 trips, respectively.

The comment notes that no improvements to these freeways are currently planned but that improvements to I-405 are being studied. No specific improvements or mitigation measures are identified to mitigate the project impact that was identified at the study intersection of Bundy Drive and the I-10 eastbound on-ramp.

This comment also acknowledges Caltrans' receipt of the Draft EIR.

COMMENT LETTER No. 5

City of Santa Monica
Office of the City Manager
Lamont Ewell, City Manager
1685 Main Street, PO Box 2200
Santa Monica, CA 90407-2200
November 9, 2006

Comment No. 5.1

Thank you for the opportunity to review the draft Environmental Impact Report (EIR) for the Santa Monica College Bundy Campus Master Plan. As you know, we have been working together with SMC and the City of Los Angeles to find ways to ensure the successful integration of the Bundy Campus with its neighbors, including the Santa Monica Airport, Airport Park, Sunset Park and Mar Vista. While this has been a complex matter, it is made possible when all participants are committed to doing what is best for our residents, our students and the diverse users of the Santa Monica Airport. The following comments are offered in the spirit of cooperation, identifying potential challenges and issues early so that thorough analysis can be completed to ensure appropriate design and operation of the proposed project. In this way, the City of Santa Monica hopes that responses to our comments will ensure a harmonious, long-term integration of the Bundy Campus with the airport and surrounding neighborhoods.

Response No. 5.1

Santa Monica College is appreciative of the efforts made by the City of Santa Monica and the City of Los Angeles to preserve the educational benefits available from the successful operation of the Bundy Campus. The Bundy Campus has now been in operation for the past year and a half. Current operational practices reflect a commitment to neighborhood quality of life, cooperative relationships with adjacent airport users, and sensitivity to City of Santa Monica and City of Los Angeles planning responsibilities.

In responding to the following comments, the College is mindful that there is rarely any dispute about sharing in benefits from College programs. About one-third of area residents or members of their families have used the College in the past five years, and overall, residents overwhelming (90%) oppose reducing SMC enrollment as a solution to traffic and parking problems.

The College has prepared this Draft EIR and the Bundy Campus Master Plan document in a good faith effort to provide the analysis and planning needed to ensure appropriate design and operation, and offers its responses to these following comments in a spirit consistent with that expressed by the City Manager, as part of a process to “ensure a harmonious, long-term integration of the Bundy Campus with the airport and surrounding neighborhoods.”

Comment No. 5.2

The City of Santa Monica has the following comments regarding the Draft EIR:

Project Description

Our first group of comments relate to the Project Description, which contains several factual errors that must be corrected in order to facilitate proper analysis and review of the project. These comments include:

1. Figure II-2 should be changed to accurately portray the location of Santa Monica Boulevard and the Emeritus College.

Response No. 5.2

Section III (Corrections and Additions) of the Final EIR includes a revised Figure II-2, which reflects the correct location of Santa Monica Boulevard and the Emeritus College. This correction does not materially change any findings or conclusions contained within the Draft EIR.

Comment No. 5.3

2. In the second paragraph of page II-4, it should be noted that the Santa Monica City Council cooperated with the College to approve the current right-turn-only egress driveway through an interim license agreement that will expire in early 2007. Permanent access has not been granted. The Council is scheduled to review continued use of this access point in the coming months. The limited access way is not Donald Douglas Loop South (DDLs), but a driveway that leads from the Bundy Campus through the

parking lot behind 3200 Airport Avenue out to DDLS and then to the “T” intersection of Airport Avenue and DDLS coming from the north. It is not a full intersection. The driveway connects to Airport Avenue, a private street that allows drivers to connect to the public roadway system at Bundy Drive to the east. This distinction and related impacts should be addressed.

Response No. 5.3

The interim license agreement referenced above describes the access route as “an access route from the Satellite Campus via a right-of-way extending south from the intersection of Donald Douglas Loop South and Airport Avenue.”

While new in practice, the idea of using this particular access route as a replacement for the historical access routes from the Bundy Campus site to Airport Avenue has figured extensively into past airport land use studies. It was included in 1984 as a component of circulation changes planned in connection with the approval of an Airport Office Park, and again in the early 1990s in studies related to proposed uses of non-airport serving residual land.

The current interim license agreement is a cooperative resolution by the Santa Monica Community College District Board of Trustees and the Santa Monica City Council to address the status of available access routes to Airport Avenue that existed at the time the site was acquired by the College in December 2001.

The College believes that the existing characterization of Donald Douglas Loop South in the second paragraph on page II-4 in Section II (Project Description) of the Draft EIR is adequate (i.e., “...provided to Airport Avenue at Donald Douglas Loop South”). To correspond with this characterization, the references to Donald Douglas Loop South on pages II-8, II-9, II-10, III-13, IV.J-23, and IV.J-46 have been corrected to read “at Donald Douglas Loop South.” These corrections are reflected in Section III (Corrections and Additions to the Draft EIR) of this Final EIR and do not affect the findings or conclusions of the Draft EIR.

Comment No. 5.4

3. Figure II-3 includes the proposed site plan. Please show pedestrian, bicycle and transit access in addition to vehicular access. It is unclear how pedestrians will access the site. This should also be referenced in the “Pedestrian and Bicycle Circulation” section later in the EIR.

Response No. 5.4

Figure II-3 includes pedestrian and bicycle lanes along Bundy Drive and the Bundy Driveways, in addition to vehicular access. This is better illustrated in a color rendering in Appendix J-1 of the Bundy Campus Master Plan, dated September 2006. The pedestrian and bike circulation used to access the campus is also provided under the “Pedestrian and Bicycle Circulation” heading on page II-10 in Section II (Project Description) the Draft EIR. As discussed in that Section, the Master Plan would provide “a meandering landscaped walkway along the Bundy Campus’ Bundy Drive”... “providing direct pedestrian

access from the existing SMC Campus Shuttle Bus stop to the Bundy Campus” as well as “dedicated bike lanes at each ingress and egress driveway within the Bundy Campus.” Public transportation facilities and opportunities are further discussed under the “Public Transportation” heading on page II-11 of Section II.

Comment No. 5.5

4. The project baseline should take into account modifications to the roadway at Bundy and Airport Ave which are being done as part of the Airport Park project.

Response No. 5.5

As part of the Airport Park project, the City of Santa Monica is reconstructing (widening) the northwest corner of Airport Avenue and Bundy Drive to improve the ability of large vehicles to make the southbound right turn into Airport Avenue. This improvement will not affect the capacity of the intersection and was therefore not specifically cited in the Draft EIR traffic analysis.

Comment No. 5.6

5. On Page II-9, there are inaccurate descriptions of “historical access points” at the Spitfire Grill driveway and 3400 Airport Avenue Building. The SMC campus has never had access at these locations on either a regular or temporary basis. Reference to these access points should be removed and analysis of alternatives based on the premise of acquiring access at these locations should likewise be removed (see Transportation, below).

Response No. 5.6

The Draft EIR has been prepared over a span of time during which changes in policy regarding access to the Bundy Campus site have occurred. The Airport Commission, an advisory body to the Santa Monica City Council, initially recommended against providing any access to Airport Avenue from the campus site. An interim license agreement providing for vehicle egress from the site to Airport Avenue was provided only after the campus had been in operation six months. This interim license agreement puts aside a dispute regarding whether or not there is an easement to Airport Avenue acquired by the District when it purchased the Bundy Campus site in December 2001.

An extensive review of the historical uses of the Bundy Campus site and the access routes to and from the site is provided in Appendix L of the Santa Monica College Bundy Campus Master Plan, issued in September 2006. The review includes aerial photographs beginning in 1928 through 2005, complete with annotations and legends. The review provides evidence of an easement, defined by California law as an implied easement, from Airport Avenue to the Bundy Campus site dating from the 1952 sale of the property by the City of Santa Monica to William Lear.

Currently the City of Santa Monica and the Santa Monica Community College District are working cooperatively to ensure the integration of the Bundy Campus with the airport and surrounding neighborhoods. For example, the Bundy Campus Master Plan includes a new half-signal to the site from

Bundy Drive, requiring a new roadway. This represents a commitment of several million dollars of District capital funds. The Bundy Campus Master Plan also commits to a permanent use of the right-of-way from the intersection of Airport Avenue and Donald Douglas Loop South and would not use the historical access routes.

As the use of the access route from the campus to the intersection of Airport Avenue and Donald Douglas Loop South is controlled by an agreement that terminates February 28, 2007, the analysis of the historical access routes is warranted. The College stresses again that the proposed Master Plan does not recommend the use of the historical access routes.

Comment No. 5.7

6. Both a Bundy Driveway and a Northeast Bundy Drive are discussed on Page II-9. The Bundy Driveway is described as having two options. This, along with the multiple access options analyzed, is not clearly or consistently described. The project description should clearly describe the proposed access and then these options should be clearly identified in the transportation analysis of the multiple transportation alternatives.

Response No. 5.7

As described on page II-8 of Section II (Project Description) of the Draft EIR, “the Bundy Campus would provide up to six points of vehicular access under the Master Plan. Section IV.J (Transportation and Traffic) provides a discussion and analysis of various combinations of one or more of these six access points to provide ingress and egress for the Bundy Campus, resulting in a total of 16 different potential Access Alternatives, not including the No Project Access Alternative. These six access points are labeled 1 through 6 in the Proposed Site Plan in Figure II-2 on page II-6 and are described further below.”

The existing driveway is described as the “Bundy Driveway.” If the installation of a half-signal is permitted by the Los Angeles Department of Transportation and the City of Los Angeles, this driveway will operate as an exit-only, right-turn only driveway, and a new driveway, described as the “Northeast Bundy Drive” will provide an inbound driveway for both northbound and southbound traffic from Bundy Drive.

If a half-signal is not permitted by the Los Angeles Department of Transportation or by the City of Los Angeles, the existing driveway (“Bundy Driveway”) will continue to operate as it currently operates.

Comment No. 5.8

7. While Comment #2 above identifies that we do not agree with the characterization of the driveway connecting to Airport Avenue as Donald Douglas Loop South on Page II-9, it does accurately describe the right-turn egress-only at this location. Please clarify the operation of this driveway as assumed in the project description.

Response No. 5.8

As described on page II-9 of Section II (Project Description) of the Draft EIR, the Master Plan assumes that access will be available by an access route to the Bundy Campus from the intersection of Airport Avenue and Donald Douglas Loop South. The Draft EIR analyzes various circulation alternatives for this access route, ranging from no use to unrestricted ingress and egress, in combination with the use of other access points to the Bundy Campus. Refer to the response to Comment 5.3 for clarification with respect to the characterization of the access at Donald Douglas Loop South as it is referenced throughout the Draft EIR.

As described on page IV.J-49 of Section IV.J (Transportation and Traffic) of the Draft EIR, all of the studied Access Alternatives (with mitigation) result in an equivalent number of significant traffic impacts. None of the Access Alternatives causes any environmentally significant traffic impact to intersections in the City of Santa Monica (including at 23rd Street/Walgrove Avenue and Airport Avenue), and all the Access Alternatives result in the addition of more than one car trip per day to two street segments in Santa Monica (to Dewey Street and to 23rd Street north of Airport Avenue).

As stated on page VI-50 of Section VI (Alternatives to the Master Plan) of the Draft EIR, “[b]ased on the results of the Traffic Study, the preferred Access Alternative under the Master Plan would be Access Alternative B4. Access Alternative B4 would provide full inbound access with a half signal at the new Northeast Bundy Driveway, right-out only access at the existing Bundy Driveway, and right-out, left-out only access to Airport Avenue at Donald Douglas Loop South.”

Comment No. 5.9

8. The EIR should note under “Discretionary Actions” that approval of any connection to Airport Avenue, a private street running through the Santa Monica Airport, requires approval by the Santa Monica City Council.

Response No. 5.9

Access from the Bundy Campus to Donald Douglas Loop South is an existing condition that is referenced as such in the Bundy Campus Master Plan. Although the College values and prefers continued access to Donald Douglas Loop South, such access is not required by the Bundy Campus Master Plan. Accordingly, no City discretionary approvals of the Bundy Campus Master Plan are necessary and this comment does not require any additions or corrections to the Draft EIR.

Comment No. 5.10

9. As the EIR includes a baseline assumption of free parking, this project element cannot be reversed without further environmental analysis. It is noted that providing free parking reduces the pressure on Airport Park parking, which will also be provided free to the general public. However, as discussed below, parking management should be comprehensively designed to meet goals as opposed to stating specific measures.

Response No. 5.10

SMC has no plans to reverse the proposed parking policy for the SMC Bundy Campus. This comment is noted for the record.

Comment No. 5.11

10. The project description states that the Bundy Campus will be occupied by programs that function as primarily stand-alone programs (although it is noted that a Career Opportunity Center is not really a stand-alone program - see page II-7).

The EIR should describe how the campus will be self-contained. Currently students attending classes at satellite campuses have a need to go to the Main Campus for registration, financial aid assistance, library services, book purchases, etc.

Given the typical pattern of college operations, which are historically adjusted based upon enrollment, the EIR should disclose the maximum capacity on the site in terms of classroom and class size, account for student need to use main campus facilities, and analyze associated transportation impacts accordingly.

Response No. 5.11

Based on an evaluation of current comparable programs, such as SMC's Academy for Entertainment and Technology, SMC's Cosmetology Program, and SMC's Nursing Program, or in comparison to such past SMC programs as Construction Technology or Automotive Technology, a future Career Opportunity Center would function primarily as a stand-alone program.

All SMC satellite campuses operate with fully-staffed counseling, library service, computer study labs, and bookstore service. All enrollment and registration is conducted online. Application for financial aid is partly conducted online and partly through the U.S. mail. Students who wish to attend campus events, lectures, seminars, and club meetings during school hours or who wish to interact with College staff housed on the main campus may use a reliable, punctual, and free intercampus transit.

Table II-1 on page II-7 of Section II (Project Description) of the Draft EIR provides the existing number of classrooms on the Bundy Campus (i.e., 16) and proposed number of classrooms on the Bundy Campus under Master Plan buildout (i.e., 30). Page II-8 of Section II describes the proposed number of students, faculty and staff on the Bundy Campus at Master Plan buildout. As stated in that section, "approximately 876 students will attend classes and approximately 53 faculty and staff will be employed on the Bundy Campus at any given time. Therefore, the number of students, faculty, and staff on the Bundy Campus at any given time at Master Plan buildout is expected to be approximately 929 persons.

Santa Monica College is a community college, with enrollment patterns unique to community colleges and distinct from enrollment patterns found at public and private four-year colleges. One-third of SMC students take only a single class; one third take two or three classes; and one-third are full-time (four or more classes). The typical three-unit class meets only twice a week. Relatively small numbers of

students require the ability to travel from campus to campus within the school day; all of these students can be and are accommodated by the provision of an intercampus transit shuttle that provides frequent, free intercampus transit. Additionally, the pricing differential for parking at the Bundy Campus (free) and at the Main Campus (\$75 per semester) discourages the use of personal vehicles for intercampus transit. Lastly, parking is impacted at the Main Campus and the use of the intercampus transit literally saves time. This is the dominant reason provided by students in a recent survey when asked why they chose to use the SMC Shuttle at the Santa Monica Beach, a route that is neither intuitive nor particularly convenient.

Comment No. 5.12

11. The City of Santa Monica is pleased to see that SMC intends to apply for LEED certification for the Bundy Campus. As concern is expressed regarding the applicability of LEED to educational institutions, SMC should also consider guidelines being developed for High Performance Schools, including many universities and community colleges. Extensive and updated information is available at <http://www.ciwmb.ca.gov/GreenBuilding/Schools/>.

Response No. 5.12

This comment is noted and will be forwarded to the Decision-Makers for their consideration. As indicated on page II-8 of Section II (Project Description) of the Draft EIR, “[t]he LEED-NC Rating System is generally applicable to new commercial construction and major renovation projects and would likely be applied to the Master Plan certification process, unless a LEED rating system specific to educational institution projects is approved in the near future.”

Comment No. 5.13

12. The Land Use and Zoning description (page III-9) does not mention that the property is adjacent to the area governed by the Santa Monica Airport Master Plan, although it is acknowledged that the airport is outside of the Master Plan boundaries. However, due to the proximity to the Airport and proposed transportation connections, the project’s environmental setting should include the Master Plan, which might lead to additional analysis in the Land Use and Zoning Section (IV, F).

Response No. 5.13

Section II (Project Description) provides an overview of the primary components of the Master Plan. Potential environmental impacts related to the Santa Monica Airport are discussed in detail in Section IV.D (Hazards and Hazardous Materials), Section IV.F (Land Use and Planning), and Section IV.G (Noise) of the Draft EIR.

Comment No. 5.14

13. Inaccuracies in the project description may reflect that the EIR preparers do not appear to have consulted City of Santa Monica officials in preparation of this document (See Section VII: Preparers of

the EIR and Persons Consulted). In responding to these comments, please do not hesitate to seek clarifications on important matters from City staff.

Response No. 5.14

The College is confident that it has exhibited a “good faith effort at full disclosure” in both the preparation of the Project Description as well as the remainder of the Draft EIR. SMC included the City of Santa Monica in the Notice of Preparation (NOP) mailing for the Bundy Campus Master Plan on September 26, 2005. The City of Santa Monica provided a response letter dated October 25, 2005 which provided extensive written input into establishing the scope of the EIR analysis, including the street intersections and segments to be studied and a list of related projects for use in the Draft EIR. City of Santa Monica officials and council members attended the Draft EIR scoping meeting held on October 17, 2005. College staff has made four separate presentations to the Santa Monica Airport Commission, one presentation to the City of Santa Monica Planning Commission, and at least three appearances before the Santa Monica City Council regarding planning issues related to the operation of this satellite campus. Furthermore, City of Santa Monica officials participated in the development of the Bundy Campus Master Plan in both formal and informal settings on numerous occasions including before the campus opened in June 2005. It should be noted that because the Bundy Campus is located in the City of Los Angeles, several City of Los Angeles agencies with whom the campus consulted in the preparation of the Draft EIR are referenced in Section VII (Preparers of the EIR and Persons Consulted) of the Draft EIR. This comment does not require any additions or corrections to the Draft EIR.

Comment No. 5.15

Air Quality

1. The Air Quality (C) conditions did not relate to the project’s specific construction impacts, given that activity will take place so close to both residents and park users. Construction dust in the air would be particularly hazardous to children playing on the playing fields at Airport Park that are expected to be heavily utilized, especially on the weekends. All of the requirements in the SCAQMD Rule 43 handbook should be specified in the construction mitigation requirements, and a higher standard should be invoked in Mitigation Measure C-10 for stopping work on weekends during periods of peak park use.

Response No. 5.15

The Air Quality analysis in the Draft EIR properly identified the Airport Park as a related project currently under construction in the immediate project vicinity. As described on page IV.C-23 of Section IV.C (Air Quality) of the Draft EIR, and shown in Table IV.C-7 on page IV.C-24, on-site emissions generated at the Bundy Campus during the phases of construction would not exceed the established SCAQMD localized thresholds for NO_x, CO, and PM₁₀ at the nearest sensitive receptor, at a distance of 25 meters. Thus, the on-site construction emissions would also not exceed the SCAQMD localized thresholds at receptor distances beyond 25 meters (i.e., 50, 100, 200, and 500 meters). The southern boundary of the Airport Park Expansion Project is located approximately 80 meters from the northern boundary of the Bundy Campus.

The mitigation measures prescribed in the Draft EIR follow SCAQMD Rule 403 guidelines and would adequately mitigate the Master Plan's construction emission impacts to a less-than-significant level. It should be noted that Section IV.C requires the Proposed Project to implement both Code-Required and Project mitigation measures. As stated on page IV.C-31, "those mitigation measures that correspond to measures that were available for input into the URBEMIS 2002 computer model [for air quality] are denoted with an asterisk (*)."

Comment No. 5.16

Noise

1. The EIR has determined that construction noise impacts are significant and unavoidable. Considering this determination, it is not clear that sufficient mitigation measures have been identified. Mitigation Measure G-2 simply restates the City of Los Angeles' construction hours restrictions, and does not offer any further mitigation of the project's impacts. It is suggested that the following, which is a Code requirement in the City of Santa Monica, be added to mitigate the impacts on nearby residents and airport tenants: "Noise exceeding 90dBA** shall be limited to 10 am to 3 pm (**Such as jack hammering, pile driving, or pavement breaking)." The project consultants are also encouraged to investigate more mitigation measures that might reduce construction noise, even if such measures do not completely mitigate all project construction impacts.

Response No. 5.16

The Draft EIR contains five Construction-related mitigation measures intending to reduce noise impacts to the maximum extent feasible (page IV.G-24 of Section IV.G (Noise) of the Draft EIR). These include measure G-1, which requires compliance with City of Los Angeles Noise Ordinance Nos. 144,331 and 161,574. Ordinance No. 144,331 prohibits loud power operated equipment within 500 feet of a residential zone between 10:00 p.m. and 7:00 a.m.; Ordinance No. 161,574 prohibits loud construction activities in the vicinity of residences between the hours of 9:00 p.m. and 7:00 a.m. Nonetheless, the Draft EIR includes mitigation measure G-2 which prohibits construction activities between 6:00 p.m. and 7:00 a.m. Therefore, the Draft EIR recommends more stringent restrictions on the hours of construction activities related to the buildout of the Master Plan than are required by the City of Los Angeles Noise Ordinance. The recommendation to further restrict construction hours between 10:00 a.m. and 3:00 p.m. is not warranted and would unduly lengthen the construction process.

Comment No. 5.17

2. Mitigation Measure G-4, which requires two weeks notice prior to demolition and construction, should be extended to include notice to the Santa Monica Airport administration and to neighbors to the south on Rose Avenue and Stewart Street, as noise and other inconvenience will also impact those locations.

Response No. 5.17

Section III (Corrections and Additions to the Draft EIR) of the Final EIR includes the following revisions to Mitigation Measure G-4:

- (G-4) Two weeks prior to the commencement of demolition and construction at the Bundy Campus, notification shall be provided to the Santa Monica Airport administration, off-site residential uses located ~~along~~to the ~~southern boundary~~ of the Bundy Campus, the Mar Vista Community Council, as well as within the Bundy Campus, disclosing the construction schedule, including the various types of activities that would be occurring throughout the duration of the construction period.

This addition does not change any findings or conclusions contained within the Draft EIR.

Comment No. 5.18

Transportation/Circulation Analysis

1. Thank you for using the HCM methodology for the analysis of intersections within Santa Monica. However, the City of Santa Monica's full methodology was not followed, as we evaluate projects from a community-wide count of information so that projects can be compared to one another. In addition, the City of Santa Monica analyzes data over a ten year horizon, not five years as done in this analysis.

Response No. 5.18

Consistent with the practice of the Lead Agency, Santa Monica Community College District, baseline traffic volume data used in the Draft EIR traffic analysis was collected following the publication of the Notice of Preparation for the EIR in the Fall of 2005. The use of this data, which is more recent than the 2002 baseline traffic volume data currently used by the City, is appropriate as it reflects existing conditions in the area.

The Draft EIR analyzed potential traffic impacts in 2010 at full build-out and occupancy of the Proposed Project. This approach is consistent with that used by the City of Los Angeles when evaluating the potential traffic impact of projects proposed in that City. The comment is correct that the City of Santa Monica typically analyzes potential traffic impacts over a ten-year horizon and is currently using 2012 as the horizon year for ongoing traffic studies, based on the 2002 baseline data. The difference in horizon years between the Draft EIR and the City's current Traffix database is thus only two years (2010 compared with 2012), rather than five years as implied in the comment. It should further be noted that the use of a five-year horizon is standard in the preparation of traffic analyses in support of CEQA documents.

Comment No. 5.19

2. Airport Avenue is analyzed as a collector street. As described above, this characterization is inaccurate as it is not a public street. For purposes of analysis, it would be most appropriate to consider this street a local street.

Response No. 5.19

The characterization of Airport Avenue as a collector street is appropriate given that the daily volume of traffic it carries (over 8,000 ADT) exceeds the maximum desirable daily volume on both local and feeder streets. It is also noted that treating Airport Avenue as a collector street for the purpose of the analysis is consistent with other recent traffic studies, including the Santa Monica Airport Park Final EIR prepared for the City of Santa Monica's Community and Cultural Services Department in October 2003.

Comment No. 5.20

3. Big Blue Bus Line #8 does not serve this site well, at best it serves the site indirectly. The stop on Ocean Park Boulevard is nearly a half mile from the entrance to campus buildings. As such, this line should not be included on Page IV J-2.

Response No. 5.20

The inclusion of Big Blue Bus Line #8 in describing existing transit service is consistent with the description of existing transit service provided in the Santa Monica Airport Park Final EIR prepared for the City of Santa Monica's Community and Cultural Services Department in October 2003.

Comment No. 5.21

4. New data for study intersections was collected from 7:00 a.m. to 9:00 a.m. and then from 4:00 p.m. to 6:00 p.m. The City of Santa Monica analyzes data from a longer period of time. We find that the peak period of traffic for either a project or the adjacent street can be as heavy an hour before or after the times analyzed in this study.

Response No. 5.21

The hours of the baseline traffic data used in the Draft EIR traffic analysis are consistent with the peak periods specified in the *Los Angeles Department of Transportation Traffic Study Policies and Procedures* (revised March 2002). It is acknowledged that the City of Santa Monica collects data for three-hour peak periods (7:00 to 10:00 a.m. and 4:30 to 7:30 p.m.) but because the Project Site lies in the City of Los Angeles, that City's procedures were followed, except for the use of specific analytical requirements in the City of Santa Monica.

It should be noted that trip generation data was collected at the Project Site from 7:00 to 10:00 a.m. and from 4:00 to 7:00 p.m. While peak hours of college-related traffic were observed from 9:00 to 10:00 am and from 5:45 to 6:45 p.m., a review of daily traffic volume data on several nearby arterial streets indicated that background traffic volumes between 6:00 and 7:00 p.m. are similar to those occurring in the peak one hour between 4:00 and 6:00 p.m. but that the background traffic volumes between 9:00 and 10:00 a.m. are considerably lower than the peak one-hour volumes occurring between 7:00 and 9:00 a.m. For this reason, the highest average one-hour volumes observed at the existing campus between 7:00 and 9:00 a.m. and between 6:00 and 7:00 p.m. were used in the project traffic analysis. Because the baseline

traffic data collected for use in this study was collected between the hours of 7:00 and 9:00 a.m. and between 4:00 and 6:00 p.m., this represents a conservative approach to projecting future traffic conditions.

Comment No. 5.22

5. Please note that the level of service (LOS) calculated from the counts taken for this project for the Santa Monica intersections differs from the LOS calculated by the City of Santa Monica for similar time frames at these locations.

Response No. 5.22

The comment is noted that the existing LOS calculated for some intersections in Santa Monica differs from what the City has calculated. An explanation for this difference is that the baseline traffic volume data used in the Draft EIR traffic analysis was collected in September 2005, while the existing base of data used by the City was collected before then. The baseline traffic data used the Draft EIR traffic analysis was intentionally collected during the third week of the semester, when college-related traffic is at its stabilized peak.

Comment No. 5.23

6. Baseline street improvements include modifications to the traffic signal at 20th Street and Pico Boulevard. Please clarify what project, initiative or development this change is associated with.

Response No. 5.23

This baseline street improvement is identified as a mitigation measure for the Airport Park project, as approved by the Santa Monica City Council on October 14, 2003. It is identified as Mitigation Measure 3.1.3 (20th Street/Pico Boulevard - Provide an eastbound protected-permitted left-turn phase at this intersection) in the Mitigation Monitoring and Reporting Plan included as Attachment A to the Council Resolution Adopting a Statement of Overriding Considerations.

Comment No. 5.24

7. As mentioned above under Project Description, Alternatives A-5, A-10 and C-2 should be removed from consideration as they utilize access points that do not exist.

Response No. 5.24

As discussed above in the response to Comment 5.8, the Project Site has historically had access to Airport Avenue through Airport property east of Donald Douglas Loop South, though access to Airport Avenue at these locations is not proposed in the Master Plan for the site (see Figure II-3 of the Draft EIR). Alternatives A-5 and A-10 were developed as scenarios in which no access to Airport Avenue at Donald Douglas Loop South would be available. Alternative C-1 and C-2 envision the potential realignment of Airport Avenue southward to run along the northern edge of the campus near Bundy Drive, providing

college-related traffic with direct access to Airport Avenue. It is noted that either of these access alternatives described in the Draft EIR would entail the relocation of the existing traffic signal at Airport Avenue and Bundy Drive. This comment does not require any corrections or additions to the Draft EIR.

Comment No. 5.25

8. Table III-1 (Related Projects) does not list the SMC Madison Campus.

Response No. 5.25

The comment is noted. The letter submitted by the City of Santa Monica following the Notice of Preparation for the Draft EIR included a current list of cumulative projects in the City for use in the analysis. That list did not include the ongoing project at the Madison Campus of Santa Monica College because it was not subject to approval by the City. Nevertheless, Section III (Corrections and Additions to the Draft EIR) of this Final EIR has been amended to include the Madison Campus as Related Project No. 118 in Table III-1 and Figure III-9 of the Draft EIR, and in Table 8 of the Traffic Study.

It should be noted that because the traffic impact analysis for the Madison Campus estimated that it would generate only nominal traffic during the typical peak periods (six trips in the a.m. peak hour and 13 trips in the p.m. peak hour) and its location is approximately four miles from the site of the Bundy Campus, the inclusion of that project in the Draft EIR traffic analysis does not affect the conclusions of the study. Therefore, the addition of the Madison Campus to Table III-1 and Figure III-9 of the Draft EIR and Table 8 of the Traffic Study does not change any of the findings or conclusions of the Draft EIR.

Comment No. 5.26

9. The description of “Parking Management” describes a specific policy of providing free parking. As the way parking is managed and operated will affect the demand for parking and may change over time, a comprehensive Parking Management plan for the Bundy Campus must be prepared in order to ensure that parking and traffic impacts on adjacent neighbors are minimized. In order to analyze these impacts, the Project Description must identify goals for the Parking Management plan and must identify a requirement to reach agreement with the City of Santa Monica, and possibly other relevant agencies, on the components of that plan prior to beginning additional construction on the campus and in the event that the agreed-upon plan requires amending. In addition to the currently stated goals, such as preventing spillover, the goals should include providing parking for students participating in programs at the Bundy campus, and addressing the management of parking for students going primarily to the main campus. The Parking Management plan should relate to SMC’s plans for shuttling students to the main campus for administrative, library and other uses. It is noted that, as part of a comprehensive strategy to reduce SMC generated traffic and parking demand in the City, the College and the City’s Big Blue Bus are currently working together to explore providing an Eastside Community shuttle, which is conceptualized as a public transit shuttle service that would connect residents of the eastern half of the City with the SMC Bundy Campus and the nearby Airport Park currently under construction. Although it may be premature to describe this shuttle in the project description, it is suggested that it be identified in concept as part of an overall Parking Management plan.

Response No. 5.26

While the Draft EIR addresses the environmental impacts of the Bundy Campus Master Plan including those related to parking, the Bundy Campus Master Plan itself does not reference “parking management,” but addresses the broader issue of “enrollment management policy.” Over the last fifteen years, the College has been following an enrollment management policy that among other purposes, is designed to reduce vehicle trips to the Main Campus. This policy provides for largely self-contained satellite campuses in support of specific programs. The policy is a key component of the College’s overall transportation management policy that encourages and rewards the use of alternative transportation modes, provides for online instruction, supports weekly and annual class scheduling efforts to reduce trips to campus, and provides for a shuttle and intercampus transit system. The purchase of the Bundy Campus in December 2001 was designed to meet education needs and to support the SMC Facilities Master Plan recommendation to balance instructional and student population capacities among the Main Campus and satellite campuses. As described in the parking analysis provided in Section IV.J (Transportation and Traffic) of the Draft EIR, the provision of 780 on-site parking spaces exceeds the peak need of 765 spaces. Furthermore, as set forth in the Bundy Campus Master Plan, SMC programs will be scheduled to insure that adequate on-site parking will be provided at all times. It should be noted that the commenter’s request that the Project Description identify commitment to a Parking Management Plan agreement between the City of Santa Monica and the College is inconsistent with the past practices of both agencies.

Additionally, the Draft EIR provides a number of mitigation measures including: (J-4) the continued operation of an intercampus shuttle; (J-5) coordination with LACMTA and Santa Monica’s Big Blue Bus to continue and potentially expand service to the site; and (J-6) application for certification under the LEED rating system with the inclusion of a number of identified transportation-related credits, including the provision of bicycle racks and showers and provision for low-emitting or fuel-efficient vehicles.

Furthermore, as stated by the commenter, the College is currently working with the City of Santa Monica, including the Big Blue Bus, to identify potential transit improvements to provide for student and community benefits. Therefore, this comment does not require any corrections or additions to the Draft EIR.

Comment No. 5.27

10. Please indicate how traffic generation was calculated for BAE Systems, the time period it was calculated for, and the relevance to EIR analysis.

Response No. 5.27

The trip generation estimates for BAE Systems were based on standard trip generation rates found in *Trip Generation, 7th Edition* (Institute of Transportation Engineers [ITE], 2003) and information that that company utilized a total of 199,000 square feet of building space both on the site of the Bundy Campus and in the adjacent buildings until 2001, including 60,000 square feet of manufacturing space, 20,000 square feet of research and development space and 119,000 square feet of single-tenant office space.

For information purposes only, additional trip generation estimates were prepared to illustrate the magnitude of trips that were generated by the previous site occupant, BAE Systems, combined with the traffic generated by the former shuttle parking lot across Airport Avenue, when both these sites were in full operations.

Together, these two previously existing uses generated approximately 548 trips in the a.m. peak hour and 413 trips in p.m. peak hour. A comparison indicates that the Master Plan at buildout would generate approximately two-thirds as much traffic (360 trips) in the a.m. peak hour and slightly more traffic, 109 percent (452 trips) in the p.m. peak hour.

Comment No. 5.28

11. We understand that zip code data was used for the trip generation assumptions for the analysis. Please consider using a subset of this data, including parking permit holders by zip code. How will the distribution of full-time versus part-time students at the Bundy Campus compare to students at the Main Campus? Full-time and part-time students may have different trip generation rates. Additionally, it appears as though no trips were assigned as coming from other satellite campuses or the Main Campus. It seems likely that some trips of this sort will be made on a regular basis.

Response No. 5.28

The College does not use the characteristic of full-time or part-time in developing enrollment management policy. Nonetheless, it should be noted that the student population at the Bundy Campus mirrors the student population at the Main Campus, including the composition of full-time and part-time students. About one-third are students taking only one class. About one-third are students taking two or three classes. About one-third are full-time students. Because the Bundy Campus will be occupied by programs that function as primarily stand-alone programs, the need for students and staff to travel from there to another campus is expected to be minimal. As a service to the College community, an inter-campus shuttle service is provided that largely eliminates the need for individuals to drive their own vehicles from one campus to another when such trips are necessary. It is also noted that the demand for parking at the Main Campus is very high, which would also serve to discourage individual drivers from traveling there from the Bundy Campus by private vehicle.

The trip generation estimate for the Master Plan is based on actual counts. Assignment of new trips to circulation routes is based on several factors, including the geographic distribution of the population from which students and employees are drawn (based on their home zip code) and the location of the project in relation to the surrounding street system. The use of home address zip code data is a reasonable assumption based on the average behavior of the student population as a whole. Additionally, the assignment of traffic traveling to and from the Bundy Campus on Airport Avenue is consistent with past observations of student traffic on Airport Avenue during semesters when the Shuttle Parking lot operated on the north side of Airport Avenue and particularly during the Fall 2005 semester when parking for the Bundy Campus was provided on the former Shuttle Parking lot. During Fall 2005, the Shuttle operation had been moved to the Santa Monica Beach and there were no restrictions of movements to and from

Airport Avenue. In this case, the distribution of trips arriving and leaving to the east and to the west on Airport Avenue is evidence of actual circumstances, not modeling assumptions.

Therefore, this comment does not require any corrections or additions to the Draft EIR.

Comment No. 5.29

12. Any proposed access option between the Bundy Campus and Airport Avenue must fully analyze potential impacts on Airport Avenue businesses and on Airport Park operations including park-related traffic circulation, parking, drop-off and pick-up and the movements associated with park users.

Response No. 5.29

The Draft EIR analyzed the potential environmental impacts of the proposed Bundy Campus Master Plan on all surrounding areas. The Draft EIR traffic analysis analyzed the potential for traffic impacts related to the proposed Bundy Campus project at numerous intersection and street locations in the vicinity of the Project Site, including the intersections of Airport Avenue and Bundy Drive, Airport Avenue and Donald Douglas Loop South, Airport Avenue and 23rd Street/Walgrave Avenue, and on two segments of Airport Avenue itself, all of which are adjacent or proximate to Airport Avenue businesses and the Airport Park site. Several potential traffic impacts were identified at intersections and street segments in the surrounding areas and mitigation measures were proposed, where feasible. The Draft EIR parking analysis found that the Proposed Project would provide an adequate supply of parking to serve the proposed uses. Furthermore, as described in the Bundy Campus Master Plan, the College schedules programs to ensure that adequate on-site parking will be provided at all times. Therefore, this comment does not require any corrections or additions to the Draft EIR.

Comment No. 5.30

13. Before making any decisions on a more permanent access option between the Bundy Campus and Airport Avenue, a comprehensive study will be required to analyze potential impacts – including traffic, pedestrian and parking impacts – on Airport tenants, users and business especially for 3400, 3300, 3200, and 3100 Airport Avenue leaseholds. It should also be noted that the airport will need to retain the ability to close this access point in situations of emergency or high security.

Response No. 5.30

The traffic circulation issues and potential impacts related to the Bundy Campus have been addressed in traffic studies prepared in November 2004, June 2005, and in this Draft EIR prepared in September 2006. All these reports have been provided to the City Manager, to Airport staff, and to the wider community. Therefore, this comment does not require any corrections or additions to the Draft EIR.

Comment No. 5.31

14. Several of the circulation plans call for the proposed half-signal at a new driveway near the northeast corner of the Bundy Campus. The proposed Master Plan states that the new driveway could not be

installed until the existing building is demolished. This means that the proposed signal would not be realistically installed at this location until several years in the future at the earliest. The analysis using these configurations should address that fact and subsequent impacts that would occur prior to the availability of such a signal as well as the impact of its delay.

Response No. 5.31

The commenter's assumption is not correct. The Bundy Campus Master Plan includes an interim plan to construct a new Northeast Bundy Driveway without demolition of the existing two-story East Building. This could be constructed as early as Spring 2007 following the completion of the environmental review process. The College is also continuing to evaluate the cost effectiveness of building this interim roadway and may instead build the final Master Plan roadway immediately (requiring the demolition of the two-story building) in Spring 2007.

Comment No. 5.32

15. Analysis of the impacts of Airport access permitting westbound traffic to 23rd and Walgrove needs to address not only the number of projected vehicle trips, but also the safety of that intersection in terms of elevation, curvature/uneven alignment and sight line factors. Additionally, the mitigation measure (J-2) that prohibits left turns from the SMC driveway to Airport Avenue only in the a.m. peak period is inadequate from two perspectives: 1) It presumes that a left turn will be allowed from this driveway, although this has never been permitted; and, 2) between 7:00 and 9:00 a.m., students and faculty arrive at the campus and the number of cars exiting should be minimal. Campus users are more likely to be exiting in the p.m. peak hour, yet the impact from this activity is not considered significant and is not addressed by the mitigation measure (with an assumption that a left turn is allowed at all). The EIR must specifically address the volume of traffic at the Walgrove/Airport Avenue intersection in the evening time period when it is highly congested.

Response No. 5.32

The Draft EIR analyzed numerous access alternatives for the Bundy Campus, including some that presume the ability of SMC-related traffic to exit to Airport Avenue and travel west. Given the fact that the provision of access to the site is a key issue that has yet to be determined, it was appropriate that the EIR take this approach.

It is acknowledged that more traffic is projected to exit the Bundy Campus in the p.m. peak hour than in the a.m. peak hour but the methodology used by the City to assess the impact of those trips at the intersection of Airport Avenue and 23rd Street/Walgrove Avenue found that this location would be significantly impacted only in the a.m. peak hour. Consistent with the practices of the City of Santa Monica, that analysis applied the "Two-Way Stop-Controlled" methodology from the Highway Capacity Manual, which bases the intersection LOS on the average vehicle control delay experienced by the most constrained approach or movement (in this case, the westbound approach from Airport Avenue), rather than the delay experienced by all vehicles traveling through the intersection. In the a.m. peak hour, when the northbound traffic flow on Walgrove Avenue is particularly heavy, the westbound right-turn

movement operates at LOS F and the southbound left-turn movement operates at LOS C. In the p.m. peak hour, the heavier flow of traffic on Walgrove Avenue is southbound and at that time the westbound right-turn movement operates at LOS C and the southbound left-turn movement operates at LOS B. Thus, the impact assessment at this intersection is based on the change in delay to the westbound right-turn movement (the most constrained approach/movement). According to the thresholds of significance used by the City of Santa Monica, the project would result in an impact at the intersection of Airport Avenue and 23rd Street/Walgrove Avenue in the p.m. peak hour if the addition of project-related traffic were to increase delay on this movement by 15 seconds or more or if the projected future LOS were to decline from LOS C to LOS D or worse. Because neither of these conditions would result from the implementation of the proposed Bundy Campus project, no significant p.m. peak hour impact was identified at this location.

Because the mitigation measure identified in the Draft EIR would fully mitigate the identified impact at this intersection, no additional improvements are required. It is noted, however, that there is an existing peak period prohibition on westbound left-turns, which appears to have been implemented in response to the safety concerns cited in the comment. It is also noted that there is conflicting signage posted regarding whether or not this prohibition is in effect on Saturdays. One sign states that the left turn prohibition is in effect “7 – 9 AM and 3 – 6 PM Except Sunday” while another states that it is in effect “7 – 9 AM and 3 – 6 PM Except Sat-Sun.” This conflict is noted for the commenter’s information only and does not affect the analysis or the conclusions of the Draft EIR.

Comment No. 5.33

16. The analysis of the intersection of 23rd Street/Walgrove Avenue and Airport Avenue analyzes this as a two-way stop-controlled intersection. Although this is standard, this type of analysis may not accurately reflect conditions at different times of the day. Perhaps vehicles entering the intersection from Airport Avenue have a difficult time entering the flow of traffic because it is so fast in the a.m., perhaps in the p.m. vehicles can enter more easily since the vehicles traveling north-south are traveling so slowly.

Response No. 5.33

As described in the response to Comment No. 5.32, the methodology used to analyze impacts at the intersection of Airport Avenue and 23rd Street/Walgrove Avenue is standard for both the City of Santa Monica and the City of Los Angeles. The identified impact at the intersection of Airport Avenue and 23rd Street/Walgrove Avenue is related to the fact that the volume of northbound traffic on 23rd Street/Walgrove Avenue in the a.m. peak hour is much higher than in the p.m. peak hour. The speed of the northbound traffic on Walgrove Avenue does not factor into the impact analysis.

Comment No. 5.34

17. The EIR needs to provide more analysis of the impact of traffic generated by turning south on Bundy Drive from the Campus and then turning west onto Rose Avenue or Palms Boulevard.

Response No. 5.34

The Draft EIR traffic analysis fully evaluated potential project impacts at the intersections of Centinela Avenue and Walgrove Avenue at both Rose Avenue and Palms Boulevard, as well as on eight neighborhood street segments in that area, and found that no significant impacts would occur there. Information on home ZIP codes of students provided by the College was used to estimate the distribution of project-related traffic. On that basis, approximately 2% to 3% of total daily project-related traffic would use Rose Avenue and approximately 2% would use Palms Boulevard. The maximum incremental addition of project-related traffic to Rose Avenue is estimated at approximately 2% of future traffic, considerably less than the 8% increase that would constitute a significant impact under the applicable City of Los Angeles threshold of significance. It was assumed that some westbound drivers would utilize Venice Boulevard and it should also be noted that the assignment of project traffic took into account the ability of drivers under all access alternatives to make left turns onto northbound Bundy Drive, either at Airport Avenue or at the project driveway, and proceed west on Ocean Park Boulevard and Pico Boulevard.

Comment No. 5.35

18. Unless the EIR imposes mitigation measures that specifically limit the maximum occupancy potential of the campus including students, faculty, staff, analysis should be based on a highest use scenario (this concern is also noted above under “Project Description” Comment #10).

Response No. 5.35

The analysis provided throughout the Draft EIR is based on the highest use scenario. The project description limits building capacity on the site to 30 classrooms. As stated on page II-8 of Section II, with 30 classrooms in use, “approximately 876 students will attend classes and approximately 53 faculty and staff will be employed on the Bundy Campus at any given time. Therefore, the number of students, faculty, and staff on the Bundy Campus at any given time at Master Plan buildout is expected to be approximately 929 persons.

Comment No. 5.36

19. The closure of the Stewart Street gate except for emergency or maintenance uses, as stated in the description, should also be listed as a mitigation measure, because a change in operation would produce severe impacts that have not been analyzed.

Response No. 5.36

As stated in the Bundy Campus Master Plan project description as well as the Project Description of the Draft EIR, the Stewart Avenue Gate will be used by SMC for emergency access and occasional maintenance access.

Comment No. 5.37

20. The Transit analysis uses an estimate of 3.5 percent of trips to and from the campus that may use transit. Please explain your use of this estimate and indicate why this is reasonable as opposed to using real data from the Main Campus or from the existing Bundy Campus.

Response No. 5.37

As described on pages 31-32 of Appendix G to the Draft EIR, the assumption that 3.5% of person trips to and from the Bundy Campus would utilize public transit is consistent with the methodology and mode split factors described in the current *Congestion Management Program for Los Angeles County* (Los Angeles County Metropolitan Transportation Authority, July 2004). This is considered reasonable given the relative lack of existing transit routes that provide direct service to the Project Site (eight buses per hour on the two lines that directly or indirectly serve the site) and the fact that the Bundy Campus would provide an adequate supply of on-site parking. Both of these characteristics distinguish it from the Main Campus where the limited availability of parking is believed to be a factor in the high level of transit use. It should be noted that no reduction was made in the trip generation estimates to reflect a higher level of transit usage than is now occurring; that is, the existing level of transit usage at the site is included, though not quantified, in the trip generation rates that were used in the Draft EIR.

It should further be noted that Section III (Corrections and Additions to the Draft EIR) of this Final EIR includes the addition of Related Project No. 119, the Big Blue Bus – New Bus Line, to Table III-1 and Figure III-9. This City of Santa Monica project would provide expanded public transit service from the Palms and Mar Vista areas to the SMC Main Campus, passing by and stopping near the Bundy Campus. This service will begin February 5, 2007. From Pico Boulevard, the bus line extends south on Westwood Boulevard, east on National Place, south on Overland Avenue, west on Palms Boulevard, south on Glendon Avenue, west on Charnock Road, south on Sepulveda Boulevard, west on Venice Boulevard, north on Centinela Avenue, continues north on Bundy Drive, west on Ocean Park Boulevard, north on 17th Street to the SMC Main Campus, and continues further north to Olympic Boulevard. There is no cost to SMC students to use this commuter line as funding is being provided by Santa Monica College in support of this City of Santa Monica project. The addition of this related project would not change the findings or conclusions of the Draft EIR.

Comment No. 5.38

21. Mitigation Measure J-3 includes making changes to the lanes on Bundy Drive at Bundy Driveway. Please include information on the feasibility of how the southbound approach can be ‘widened.’ Please ensure that the feasibility of such a mitigation measure includes consideration of whether this will be widened within the public right-of-way or through the use of private property. Will alignment of striping on the street, including transitions, need to be changed? How will this affect pedestrian access and access to and location of transit stops?

Response No. 5.38

The extension of the deceleration lane that currently exists south of Airport Avenue on the west side of Bundy Drive requires the use of public property. Several feet of the extension requires the use of property owned by the City of Santa Monica and the balance of extension requires use of property owned by the Santa Monica Community College District. The extension of this deceleration lane has been discussed with representatives from the City of Los Angeles and representatives from the City Manager's Office from the City of Santa Monica. The relocation of the transit stop has also been discussed with representatives of the City of Santa Monica's Big Blue Bus.

Comment No. 5.39

22. The Parking Impacts discussion describes the parking for uses on site. If parking is free, what would deter people headed for the Main Campus from using this site as a de-facto park-and-ride lot? Please include this in the analysis.

Response No. 5.39

SMC has instituted a program that requires students using the intercampus transit from the Bundy Campus to the Main Campus to show their student registration program to a site officer and pick up a key ring ID tag that must be shown to the transit driver. This program is currently in place and has proven effective.

Comment No. 5.40

23. Mitigation Measure J-1 should indicate any possible secondary impacts of pedestrian access to the site and Airport Park. What equipment and what is the scope of work that would be necessary to implement this mitigation measure?

Response No. 5.40

The implementation of the proposed Mitigation Measure J-1 would not affect pedestrian access to the Project Site or to Airport Park. There are existing crosswalks at the intersection of Airport Avenue and Bundy Drive on the west leg of the intersection and on the south leg of the intersection. The ongoing improvements related to Airport Park will not alter this basic arrangement for pedestrian access, although the relocation of the northwest corner of the intersection will increase the north-south pedestrian crossing distance by approximately five to ten feet and will provide for the installation of new handicapped ramps on the southwest and northwest corners of the intersection.

Because there is and will be no crosswalk on the north leg of the intersection, the recommended restriping to provide one left-turn lane and one shared left-turn/right-turn lane on the eastbound approach under Access Alternatives A1 through B4 would not affect pedestrian safety. It could be implemented by restriping the existing roadway and installing appropriate complementary signage to indicate the lane assignments. This is also true of the proposed mitigation measure under Alternatives C1 and C2, which

assume that the existing intersection of Airport Avenue and Bundy Drive would be relocated southward and rebuilt with a three-lane eastbound approach.

It should also be noted that as of the date of issuance of this Final EIR, the City of Santa Monica has restriped the eastbound approach lanes of Airport Avenue at Bundy Drive to provide one left-turn lane and one shared left-turn/right-turn lane in connection with the Airport Park project currently under construction.

Comment No. 5.41

24. Mitigation Measure J-2 describes a condition that should be part of the project description, but it is unclear, as previously noted. Vehicles exiting the driveway at Airport Avenue are only allowed to turn right. Thus, this cannot be a mitigation measure. Please describe how effective this mitigation might be.

Response No. 5.41

The proposed Mitigation Measure J-2 would prohibit left-turns from the south leg of the intersection of Donald Douglas Loop South and Airport Avenue during the a.m. peak period to eliminate the identified impact at the intersection of Airport Avenue and 23rd Street/Walgrove Avenue. It is acknowledged that this prohibition is in place under existing conditions. The Draft EIR, however, analyzed numerous potential access alternatives for the Project Site, including some that would allow College-related traffic to travel west from the Bundy Campus onto Airport Avenue. Under those access alternatives, the proposed mitigation measure would fully mitigate the project-related impact that was identified at Airport Avenue and 23rd Street/Walgrove Avenue. This is further discussed in the response above to Comment 5.32.

Comment No. 5.42

25. Please explain why you have included an assumption that vehicles going to or from the Bundy Campus are using Dewey Street west of 23rd Street.

Response No. 5.42

Distribution of vehicle traffic is based on a number of factors, including the use of student zip codes for their home addresses. Annually, 2,317 students attend SMC who indicate that 90405 is their home zip code. In addition, it is recognized that Dewey Street west of 23rd Street is used by some through traffic, particularly drivers attempting to reach 23rd Street from the west.

Comment No. 5.43

26. Mitigation Measure J-4 is problematic from the perspective that it requires a shuttle that may not be necessary after introduction of the Eastside Shuttle. Furthermore, J-4 is a mitigation measure that requires its own environmental analysis, in that an expanded shuttle from the airport to other SMC campuses will impact the number of trips to the Bundy campus, in contradiction to the project description of the Bundy campus as a stand-alone operation, and may have a detrimental effect on Airport Park's

ability to provide available parking for its users. J-4 should be removed and the concept should instead be integrated as part of the Parking Management Plan suggested above.

Response No. 5.43

The intercampus transit connecting the Bundy Campus to the Main Campus provides students who are primarily attending classes at the Bundy Campus access to additional classes and programs at the Main Campus without generating additional vehicle trips. The intercampus transit also provides students who arrive at the Main Campus via public transportation, alternative transportation, or private vehicle the ability to attend classes at the Bundy Campus. The intercampus transit is an existing resource that does not require environmental analysis. The assumption that the intercampus transit will add vehicle trips to the Bundy Campus is not supported by fact or analysis.

SMC programs will be scheduled to insure that adequate on-site parking will be provided at all times. The intercampus transit decreases vehicle trips between the Main Campus and the Bundy Campus and does not add parking demand to the Bundy Campus. The Bundy Campus Master Plan will not result in spillover parking demand; as a consequence, the Bundy Campus Master Plan, including the component of an intercampus transit service, will not result in any adverse impacts on the operation of Airport Park.

Under any circumstances, Santa Monica College routinely explores additional trip reduction strategies as opportunities arise. Currently, discussions are underway with the Santa Monica Big Blue Bus regarding line extensions and headway improvements that could potentially lead to overall vehicle trip reductions.

The Big Blue Bus is also looking at a variety of neighborhood transit strategies that would incorporate the use of smaller buses similar to the size of buses that Santa Monica College uses for its intercampus transit system. Santa Monica College and the Big Blue Bus are exploring the coordination of the Big Blue Bus neighborhood transit strategy with the SMC intercampus transit. Mitigation Measure J-4 may be satisfied by either the continued operation of the SMC intercampus transit or by a substitute shuttle system developed in cooperation with the Big Blue Bus.

Comment No. 5.44

27. Mitigation Measure J-5 should be worded more strongly to require not only “coordination” with Big Blue Bus, but also to require that SMC contribute to funding of a shuttle system that is primarily being introduced in order to meet the needs of SMC students.

Response No. 5.44

The existing intercampus transit meets the needs of SMC students to connect from the Bundy Campus to activities at the Main Campus. The purpose of the proposed Big Blue Bus shuttle system is to improve bus service to residents along the shuttle bus route, including to residents who wish to attend programs at the Bundy Campus or the Main Campus. Obviously, these are complementary purposes, and the College and the Big Blue Bus are exploring the coordination of services.

Comment No. 5.45

28. Mitigation Measure J-6, the pursuit of transportation points for LEED certification is not a legitimate mitigation measure in that LEED certification is not an action that mitigates impacts identified in the project, but rather bestows an award for other actions that improve a project. Furthermore, Credit 4.1 simply recognizes the presence of bus lines that already exists (see also Transportation Comment #3, above) and Credits 4.2 and 4.3 are noncommittal and address the small number of project users who are employees as opposed to students.

Response No. 5.45

The College believes that LEED certification should be retained as a mitigation. Also, Credit 4.1 rightfully recognizes existing transportation services, as these services are in place and serve to mitigate demand for vehicle trips. As further described in the response to Comment No. 5.37, the Big Blue Bus is studying route modifications to further mitigate the demand for vehicle trips to the Bundy Campus.

Also, the assumption that Credits 4.2 and 4.3 address only employees is incorrect. These measures address all users, including students.

Comment No. 5.46

Public Utilities

1. The analysis of impact on public services focused on Los Angeles Police and Fire, but did not take into account impacts on City of Santa Monica's police services that will be needed to address the use of Airport Avenue by motor vehicles that are moving at excessive speeds; performing illegal traffic maneuvers, including illegal left turns onto Airport Avenue and improper "extra" turns into and out of Airport Avenue parking lots to circumvent the no left turn restriction. The City of Santa Monica believes that there will be an impact and a proper mitigation measure should be identified to compensate the City for anticipated expenses.

Response No. 5.46

An analysis of the Proposed Project's impacts upon police services is contained in Section IV.I.1 of the Draft EIR. As described in Section IV.I.1, the primary service provided to the campus is the Santa Monica Campus Police Department (SMCPD). Due to the Campus' location in the City of Los Angeles and adjacent to the City of Santa Monica, the Los Angeles Police Department (LAPD) and the Santa Monica Police Department (SMPD) provide service to the areas immediately surrounding the Project Site and would provide supplemental assistance to the campus, as needed. (See page IV.I-3 of the Draft EIR.) With respect to traffic-related impacts, the SMCPD would continue to patrol the SMC Bundy Campus, which includes providing a police presence that would serve to deter traffic violations on the roadway serving the campus.

Additionally, the Bundy Campus site contributes directly to the operating revenue of the Santa Monica Airport as the Bundy Campus site is regularly made available to tenants of the Santa Monica Airport for event parking on weekends and College holidays. In part, the revenue generated by these events serves to off-set the financial impacts to public services, including the SMCPD.

Comment No. 5.47

Comments from the City of Santa Monica Airport Commission

The Airport Commission reviewed and discussed the Draft EIR at its October 23, 2006 meeting and requested to forward the following comments and concerns:

1. The section on Air Quality does not adequately address air pollution from traffic generated by the project because it does not accurately describe the extent of the shuttle service, including students from other campuses parking at the Bundy campus and using the SMC shuttle, and therefore the expected number of trips that the project generates.

Response No. 5.47

The Draft EIR's air quality analysis was based on the project-related traffic volumes reported in the Traffic Study. The Bundy Campus is not proposed to be utilized as a shuttle parking lot and thus no trips or air quality emissions would be generated by such a use.

Comment No. 5.48

2. The EIR does not discuss airport security issues generated by having many more people going through the Santa Monica Airport.

Response No. 5.48

Operation of the Bundy Campus does not pose increased security issues to the Santa Monica Airport. Access to the Bundy Campus does not require access to or through the Santa Monica Airport.

Comment No. 5.49

3. It is not appropriate to use as a project base line the traffic generated by the previously existing College Shuttle Program because that shuttle has not been in place for two years. Thus the EIR analysis of traffic impacts is inaccurate because it has taken "credit" that masks the project's impacts.

Response No. 5.49

The Draft EIR traffic analysis does not take credits to "mask" the impacts of the proposed Master Plan. The traffic analysis provided in Draft EIR documents contains three steps: (1) estimating the trip generation of the Proposed Project; (2) determining the trip distribution; and (3) assigning the trips generated by the Proposed Project to the roadway system.

(1) Normally, existing environmental conditions in a CEQA document should be described as they exist at the time the Notice of Preparation (NOP) for a proposed project is published (State CEQA Guidelines Sec. 15125(a)). The NOP for the Bundy Campus Master Plan was published on September 26, 2005. However, because the SMC Shuttle Parking Lot formerly located across the street from the Bundy Campus ceased operations in August 2005 and was in the process of being moved to Santa Monica Beach Parking Lot 5 at the beginning of the Fall 2005 semester, the Draft EIR uses the actual count of vehicles entering and exiting the Bundy Campus site in February 2006. The trip generation study for the Bundy Campus took place during the beginning of the third week of the Spring 2006 semester when college-related traffic is at its stabilized peak, a measurement standard consistent with past practice. Fall 2006 enrollment is 3.5% lower than Spring 2006 enrollment, according to SMC's Office of Institutional Research (Spring 2006 total graded enrollment = 26,706; Fall 2006 total graded enrollment = 25,832). As a consequence, the trip generation study represents the worst-case conditions. The Draft EIR does not include the vehicle trips generated by the College Shuttle Program as that program ceased operating in August 2005.

(2) The trip distribution is based on student home zip codes. The percentages from each zip code do not change in any significant way from semester to semester, given the large numbers involved. The prior Shuttle Program has no bearing on the trip distribution process.

(3) The new trips estimated to be generated by the Proposed Project are assigned to the roadway system. In this case, new counts were taken at 27 study intersections and 22 street segment locations in Fall 2005. During the Fall semester, at the time of these counts, students attending the Bundy Campus parked on the site of the former Shuttle Program located on the north side of Airport Avenue and not on the Bundy Campus itself. These trips of students attending classes at the Bundy Campus but originating from the site of the former Shuttle Program were included in the roadway and intersection counts. As a technical adjustment, these trips originating from the site of the former Shuttle Program were "unassigned" (subtracted) from the roadway segments and intersections and then "reassigned" (added) to the roadway segments and intersections in a manner designed to match the conditions assumed in each of the project access alternatives that were analyzed, including A8 which is similar to the existing condition in its location of access points and restrictions on turning movements. This unassignment and reassignment is entirely of vehicles whose occupants are attending classes at the Bundy Campus and there is no "credit" provided for prior Shuttle Program generated trips.

Comment No. 5.50

4. There are concerns about potential use of Airport Park parking by students either attending the Bundy Campus or using the SMC shuttle. The EIR did not address these potential impacts on parking, drop off and general circulation at Airport Park and did not include appropriate mitigation measures.

Response No. 5.50

The SMC Shuttle Program ceased operating from the Santa Monica Airport in August 2005. The Shuttle Program has been relocated to another site that is not on the Santa Monica Airport. As a consequence, there are no parking impacts from the SMC Shuttle Program on Airport Park. As described in Section

IV.J (Transportation and Traffic) of the Draft EIR, there is sufficient parking onsite for students attending classes at the Bundy Campus. Additionally, as further described in the Bundy Campus Master Plan, SMC programs will be scheduled to insure that adequate on-site parking will be provided at all times. Details of the analysis of parking impacts can be found on page IV.J-43 of the Draft EIR.

SMC has instituted a program that requires students using the intercampus transit from the Bundy Campus to the Main Campus to show their student registration program to a site officer and pick up a key ring ID tag that must be shown to the transit driver. This program is currently in place and has proven effective.

Comment No. 5.51

5. The EIR has not sufficiently and adequately addressed existing parking shortages at other SMC campuses and how spillover might affect traffic and air quality at the Bundy campus through use of the shuttle system.

Response No. 5.51

As provided in the responses to Comment No. 5.50, above, SMC has instituted a program that requires students using the intercampus transit from the Bundy Campus to the Main Campus to show their student registration program to a site officer and pick up a key ring ID tag that must be shown to the transit driver. The Draft EIR adequately addresses traffic, air quality, and parking impacts related to the buildout of the Bundy Campus Master Plan. The Draft EIR does not and is not required to address existing, current, or future traffic, air quality, and parking impacts at SMC's other campuses.

Comment No. 5.52

6. The Commission would like to see the project description more specifically commit to stand alone programming at Bundy Campus.

Response No. 5.52

The Bundy Campus Master Plan provides for sufficient on-site parking to support the planned programs and facilities. Furthermore, as described in the Bundy Campus Master Plan, SMC programs are scheduled to insure that adequate on-site parking will be provided at all times.

Comment No. 5.53

7. The assumption that allowing a left turn through the airport to 23rd Street would not have a significant impact on that intersection is flawed. Further analysis based on more accurate assumptions is needed. Furthermore, more realistic assumptions might result in different results showing potentially significant impacts at other intersections such as Walgrove/Rose, 23rd St./Pico, 23rd St./Pearl, Ocean Park/28th St., Ocean Park/23rd St.

Response No. 5.53

The Draft EIR traffic analysis was conducted using the standard impact assessment methodologies used by the Cities of Santa Monica and Los Angeles, including intersection level of service methodologies and significance criteria. The assignment of traffic associated with the existing use and with the Proposed Project was based on observed traffic patterns at the site and on actual data regarding the residential locations of the student body of the College. The effectiveness of the proposed Mitigation Measure J-2 is further discussed in the responses above to Comments Nos. 5.32 and 5.41.

Comment No. 5.54

The Commission also generally conveyed its preference for Alternatives A-3, B-3 & A-4, based on the information presented to them.

Thank you for your careful consideration and response to the above comments. Should you have any questions or need additional information from the City of Santa Monica, please do not hesitate to contact Elizabeth Bar-El, AICP, Senior Planner, at (310) 458-8341.

Response No. 5.54

Comment noted. These comments will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 6

City of Los Angeles, Department of Transportation (LADOT)
Gloria Jeff, General Manager
100 S. Main St. 10th Floor
Los Angeles, Ca 90012
November 8, 2006

Comment No. 6.1

The City of Los Angeles Department of Transportation (LADOT) has reviewed the Draft Environmental Impact Report (DEIR) for the proposed Santa Monica College Bundy Campus Master Plan at 3171 S. Bundy Drive. The proposed development would demolish the existing 33,055 square-foot building on the east end of the campus, would construct a new two-story 38,205 square-foot building next to the existing 64,000 square-foot building, and would provide approximately 780 on-site parking spaces. Thirty total classrooms would be provided in the Santa Monica College (SMC) satellite campus on Bundy Drive with this proposed expansion.

Response No. 6.1

Comment noted.

Comment No. 6.2

LADOT has worked with SMC's staff and traffic consultants in reviewing and designing the project's access and circulation elements. However, during the preparation of the traffic impact analysis, LADOT involvement has been limited. After initial input regarding study intersections, future roadway network and related land use project assumptions, no further consultation with LADOT was sought during the preparation of the project's traffic impact study (Appendix G of the DEIR) nor in the identification of traffic mitigation measures - a customary step prior to public circulation of the environmental documents. The traffic impact study assumptions and results, as presented in Appendix G of the DEIR, were not concurred by LADOT prior to publication.

Response No. 6.2

While it is correct that consultation typically occurs with LADOT at several points during the preparation of a Traffic Study when the City of Los Angeles is the Lead Agency, the Lead Agency for the environmental review of the Bundy Campus Master Plan is the Santa Monica Community College District and continuing coordination with outside agencies during the preparation of the Traffic Study would not have been customary in this case.

Comment No. 6.3

LADOT offers the following comments on the SMC Bundy Campus Master Plan Project DEIR:

Comments on the Traffic Study (Appendix G)

1. Trip Generation

The proposed SMC Bundy Campus Master Plan project is expected to generate approximately 5,317 trips per weekday, 360 trips during the weekday a.m. peak hour, and 452 trips during the weekday p.m. peak hour. The report indicates that the existing 64,000 square-foot building was surveyed in late February and early March 2006 to determine the amount of vehicle trips generated by this satellite campus. Since this existing building houses sixteen classrooms, a trip generation rate was derived that estimates the total number of vehicle trips per classroom. Then, this rate was applied to the proposed new two-story 38,205 square-foot building expected to house an additional fourteen classrooms. Since the DEIR was released without LADOT review of the results of the traffic study, there was no independent review or verification conducted by LADOT of these trip generation estimates, so the results were never validated.

Response No. 6.3

Comment noted. This comment does not identify an inaccuracy in the methodology or findings of the Traffic Study or Draft EIR traffic analysis for the Bundy Campus Master Plan. While the comment correctly states that the total estimated trip generation of the proposed project is approximately 5,317 trips per weekday, 360 trips during the weekday a.m. peak hour, and 452 trips during the weekday p.m. peak hour, it should be noted that these volumes represent the total estimated traffic generated on the site at full

buildout of the proposed Master Plan. It is important to acknowledge that SMC currently operates a satellite campus at this location. When traffic related to the existing campus is taken into account, the net new trip generation of the Master Plan project is approximately 2,877 daily trips, including 121 trips in the a.m. peak hour and 203 trips in the p.m. peak hour, as shown on page IV.J-28 and IV.J-29 of the Draft EIR. These estimates were based on actual driveway count data collected at the existing campus over several days, an approach that is often used when evaluating proposed changes to an existing facility that has unique trip-generating characteristics.

As stated in the response to Comment No. 6.2, the Lead Agency for the environmental review of the Bundy Campus Master Plan is the Santa Monica Community College District not the City of Los Angeles. This comment does not require any corrections or additions to the Draft EIR.

Comment No. 6.4

Is enrollment and class attendance higher during the start of the school's Fall semester? If the answer is yes, then it is recommended that a new survey of the existing campus be conducted at the start of the Fall semester to derive the trip generation rates. Doing so would ensure that the rates reflect the true worst-case conditions in terms of project trip generation. The counts used to derive the trip generation rates were taken in February and March, which may reflect lower class attendance rates due to dropped classes, student transfers, Spring vacations, etc.

Response No. 6.4

Santa Monica College operates on a semester calendar, with two 16-week semesters (Fall and Spring) and two 6-week intersessions (Winter and Summer). The trip generation study for the Bundy Campus took place during the beginning of the third week of the Spring 2006 semester when college-related traffic is at its stabilized peak, a measurement standard consistent with past practice. Fall 2006 enrollment is 3.5% lower than Spring 2006 enrollment, according to SMC's Office of Institutional Research (Spring 2006 total graded enrollment = 26,706; Fall 2006 total graded enrollment = 25,832). As a consequence, the trip generation study represents the worst-case conditions.

Comment No. 6.5

2. Neighborhood Street Traffic Analysis

The traffic study includes an analysis of the potential for adverse project impacts on residential streets. However, the analysis only evaluates the impacts expected of the traffic associated with the new two-story building and not of the traffic generated by the entire SMC Bundy Campus. The traffic from the existing 64,000 square-foot building was never evaluated for potential neighborhood traffic impacts prior to its construction.

Response No. 6.5

The impacts associated with the current operation of the Bundy Campus were evaluated under an Initial Study/Mitigated Negative Declaration (IS/MND) adopted by the College Board of Trustees in February 2004, which included a traffic analysis. The analysis concluded that that project, the community college use of the existing four-story West Building, would not result in significant traffic impacts in the surrounding vicinity. The Draft EIR addresses those impacts that would result from buildout of the Bundy Campus Master Plan.

Comment No. 6.6

With many of the area's major arterials operating at gridlock conditions during peak commute hours, the potential for commuter cut-through traffic through neighborhood streets should be evaluated. Neighborhood residents surrounding the project site have notified City of Los Angeles officials of the problem of commuter cut-through traffic through their streets. The preparation of a residential street impact analysis would attempt to identify residential streets that may be impacted by the project's traffic or by the redistribution of existing traffic due to the presence of the project traffic. It is recommended that the residential street impact analysis be revised to measure the potential impacts resulting from the traffic generated by the overall SMC Bundy Campus. If it is expected that the project may lead to increased commuter cut-through traffic along residential streets, then SMC is encouraged to work with LADOT, with City of Los Angeles Council District 11, and with affected neighborhood groups to develop a neighborhood traffic management plan.

Response No. 6.6

The Traffic Study prepared for the Bundy Campus Master Plan evaluated the potential for the buildout of the Master Plan to result in significant impacts on 22 neighborhood streets, including 12 in the City of Los Angeles and 10 in the City of Santa Monica. For this analysis, existing traffic generated by the Bundy Campus at the time of the baseline data collection was identified and unassigned from the surrounding street system. The total estimated future trip generation, based on both the existing and proposed uses on the site, was then assigned to the surrounding street system in accordance with the particular access scenarios that were evaluated in the EIR. The appropriate thresholds of significance were used for each jurisdiction. In the City of Los Angeles, the threshold for identifying a significant impact on the analyzed street segments was either one trip, +8%, or +12% of the total projected volume; in the City of Santa Monica, the threshold for identifying a significant impact was either one trip, +12.5%, or +25%. The analysis found that the project could significantly impact two or three street segments in the City of Santa Monica, depending on the access scenario considered; however, no significant neighborhood street segment impacts were identified in the City of Los Angeles. For this reason, no mitigation was identified.

Comment No. 6.7**3. Traffic Mitigations**

Of the 27 intersections studied, the report indicates that the project will result in significant traffic impacts at the following six study intersections:

- Bundy Drive & 1-10 Freeway Eastbound On-ramp
- Bundy Drive & Ocean Park Boulevard
- Bundy Drive & National Boulevard
- 23rd Street/Walgrove Avenue & Airport Avenue
- Bundy Drive & Airport Avenue
- Bundy Drive & SMC Bundy Campus Driveway

Response No. 6.7

The comment incorrectly states that buildout of the proposed Master Plan project would result in significant traffic impacts at six study intersections. In fact, the number of significantly impacted study intersections would range from four to six, depending on the access scenario selected. With implementation of the proposed mitigation measures, four study intersections would be result in significant and unavoidable impacts. This comment does not identify an inaccuracy in the methodology or findings of the Traffic Study or Draft EIR traffic analysis for the Bundy Campus Master Plan and, as such, does not require any corrections or additions to the Draft EIR.

Comment No. 6.8

On page 23 of Appendix G, the report discusses potential traffic mitigations at two intersections but then immediately dismisses these mitigations as infeasible. Also, mitigations are proposed at two other intersections that would not fully mitigate the project's impacts. At no time was LADOT consulted with during the evaluation of potential mitigation measures. No mitigation drawings were presented to LADOT for review. Therefore, it recommended that SMC work with LADOT to develop a comprehensive and meaningful traffic mitigation plan that could potentially include intersection and roadway improvements, freeway access improvements (specifically at Bundy Drive and the 1-10 Freeway eastbound on-ramp), transit enhancements, trip reduction elements, and/or traffic signal upgrades.

Response No. 6.8

Staff of the City of Los Angeles Department of Transportation (LADOT) was consulted on December 18, 2006 during the preparation of this response. No additional input has been received from LADOT at this time. As discussed previously in the response to Comments Nos. 6.2 and 6.3, while the Santa Monica Community College District is the Lead Agency for the Bundy Campus Master Plan, SMC has consulted with, and is continuing to consult with and incorporate the recommendations of LADOT in the design of the proposed Northeast Bundy Driveway. SMC is committed to continuing its cooperative relationship with LADOT in addressing traffic in the areas impacted by the Bundy Campus.

Comment No. 6.9

The proposed mitigation at 23rd Street/Walgrove Avenue and Airport Avenue is to restrict left-turns from Donald Douglas Loop South onto westbound Airport Avenue from 7 a.m. to 9 a.m. Since the impact at this study intersection is estimated to occur only during the morning peak hours, this turn restriction would restrict project traffic from heading west on Airport Avenue to 23rd Street/ Walgrove Avenue. However, rerouting this traffic away from 23 Street/ Walgrove Avenue and toward Bundy Drive would result in increased delays along Bundy Drive. These potential increased delays should be evaluated and discussed in the project's environmental report. LADOT cannot support this proposed mitigation until the secondary impacts resulting from this turn restriction are evaluated.

Response No. 6.9

The proposed mitigation measure for the intersection of 23rd Street/Walgrove Avenue and Airport Avenue would result in very few outbound trips from the campus being forced to turn right onto Airport Avenue during the time the proposed operational mitigation measure is in effect (estimated at four trips in the a.m. peak hour). The Draft EIR fully evaluated several scenarios (access alternatives A2, A3, A4, A7, A8, B3 and C1) that assume no vehicular access from the site onto westbound Airport Avenue, thus providing the additional analysis requested by the commenter, and they show that the modest level of shifted traffic from this movement would not result in additional significant impacts that are not identified in the Draft EIR, either along Bundy Drive/Centinela Avenue or elsewhere.

Comment No. 6.10**4. Project Access and Circulation**

Although historically the primary project access to the site has been provided via the existing traffic signal at Airport Avenue and Bundy Drive, due to objections from the City of Santa Monica who has jurisdiction over the use of Airport Avenue, the City of Los Angeles and SMC have been required to investigate a new access to the SMC Bundy Campus via an ingress-only driveway on Bundy Drive south of Airport Avenue rather than using the Airport Avenue access. If this option, which is similar to the DEIR access option B-4, is pursued, it is recommended that the inbound-only driveway on Bundy Drive be located up to 100-feet north of the existing driveway. Relocating this driveway to the north would allow DOT to design a northbound left-turn lane into the driveway while preserving southbound left-turn access from Bundy Drive onto Stanwood Drive. To safely accommodate motorists destined for the campus from northbound Bundy Drive, a new half signal may be necessary and is currently being evaluated.

Response No. 6.10

SMC is working with LADOT on the proposed half signal, and has incorporated LADOT suggestions into the Interim and Final Phases of the proposed Master Plan. It should be noted that the location of the proposed northern driveway on Bundy Drive, as shown in the plans submitted to the City, is approximately 125 feet north of the existing Bundy Drive driveway.

Comment No. 6.11

LADOT has been working with SMC on the proposed half traffic signal. While a final traffic signal warrants analysis has not yet been completed by LADOT, SMC's traffic consultant (Kaku Associates, Inc.) has prepared a traffic signal microsimulation to evaluate how an additional signal would impact traffic flow along Bundy Drive. The results reveal that a new "half" traffic signal on Bundy Drive and the project driveway can be designed and timed in coordination with the existing signal at Airport Avenue and Bundy Drive with minimal impacts to traffic flow. The "half" traffic signal would provide a northbound left-turn arrow from Bundy Drive into the Campus driveway. Northbound through traffic would not be controlled by the signal at the driveway. With a left-turn arrow provided for northbound motorists destined for the campus, southbound through traffic would be stopped only when the northbound left-turn arrow is green. Sensors embedded in the roadway would trigger the need for the northbound left-turn green arrow. The exact placement of the driveway, the timing and coordination of the two traffic signals, and the configuration of the lane assignments for both intersections (Bundy Drive/SMC Driveway and Bundy Drive/Airport Avenue) are currently being evaluated.

Response No. 6.11

SMC is working with LADOT on the proposed half signal, and has incorporated LADOT suggestions into the Interim and Final Phases of the proposed Master Plan.

Comment No. 6.12**5. Level-of-Service Worksheets**

The report does not include the level-of-service (LOS) worksheets that should have been prepared and included in the DEIR for the "Future with Project with Mitigations" scenario. Therefore, the effectiveness of any proposed traffic mitigations could not be reviewed. It is recommended that these worksheets be submitted, along with any other revisions to the traffic study, to LADOT for review.

Response No. 6.12

The information referred to in the comment is included in the Draft EIR. Appendix G of the Draft EIR is the Traffic Study and the "Cumulative plus Project (Year 2010) City of Los Angeles Methodology with Mitigation" are located in Appendix D to the Traffic Study. See pages 1077 through 1133 of Appendix G to the Draft EIR, posted on SMC's website at http://www.smc.edu/facilities_airport/pdf_files/09-2006_masterplan/draft_eir_tech_appdx/Appendix_G.pdf. For reference, these worksheets have been included in Section III (Corrections and Additions to the Draft EIR) of this Final EIR.

Comment No. 6.13**6. Programmed Infrastructure Improvements**

The identified list of planned roadway improvements did not include the planned intersection improvement at Inglewood Boulevard and Venice Boulevard. This improvement will widen the south leg

of the intersection to provide one left-turn lane, one through lane, and one right-turn lane in the northbound direction. The assumed lane configuration at this intersection for all future scenarios should be revised. This revision is not expected to result in any significant changes to the project findings.

Response No. 6.13

Coordination with LADOT staff was conducted early in the study process to identify the streets and intersections for analysis in the Draft EIR traffic study, as well as any planned street improvement projects that would affect those locations. All intersections and street segments identified by LADOT were fully analyzed for each of the project Access Alternatives that were studied in the Draft EIR. Information was received on numerous future baseline street improvement projects, as described on pages 13 and 14 of Appendix G to the Draft EIR, and was included in the Draft EIR traffic analysis. No information was received at that time on the planned improvement described in the comment. In light of the new information provided by the commenter, however, projected future levels of service for the intersection of Inglewood Boulevard and Venice Boulevard have been recalculated with the planned improvement in place and the results are included in Section III (Corrections and Additions to the Draft EIR) of this Final EIR. As anticipated by the commenter, the inclusion of this improvement does not alter the findings of the traffic impact analysis conducted for Draft EIR; that is, that the Proposed Project would not result in a significant traffic impact at the intersection of Inglewood Boulevard and Venice Boulevard under any of the access scenarios that were evaluated.

Comment No. 6.14

Conclusion

With much of the area's infrastructure already fully built and with the high level of congestion experienced daily by commuters in this area, it is not expected that the project can fully mitigate all of its negative traffic impacts. Nonetheless, it is recommended that SMC work with LADOT and with the City of Santa Monica to develop a comprehensive and meaningful traffic mitigation plan that can reduce the overall traffic impacts and delays resulting from the project. Also, it is recommended that SMC work with LADOT to revise the residential street impact analysis.

Response No. 6.14

See response to Comment Nos. 5.14, 6.2, 6.5, 6.6, and 6.8 above. As discussed therein, SMC has consulted with both the City of Santa Monica and LADOT in the preparation of the traffic analysis for the Draft EIR, including the residential street analysis. SMC is also engaged in ongoing consultation with LADOT in the design of the proposed Northeast Bundy Driveway. LADOT was also consulted in the preparation of the response to Comment No. 6.8 but no additional input has been received from LADOT at this time. This comment does not require any corrections or additions to the Draft EIR.

Comment No. 6.15

Since the report identifies a significant traffic impact at the intersection of Bundy Drive and the 1-10 Freeway eastbound on-ramp but does not propose a mitigation, it is recommended that SMC meet with Caltrans to discuss and evaluate improvement options at this key freeway access point.

If you have any questions, please contact me or Tomas Carranza of my staff at 213-972-8476 and 310-642-1624, respectively.

Response No. 6.15

SMC included Caltrans in the Notice of Preparation (NOP) mailing for the Bundy Campus Master Plan on September 26, 2005. Caltrans provided a response letter dated October 12, 2005 which provided recommendations for the assumptions and methodology used in the Traffic Study for the Bundy Campus Master Plan. These recommendations were generally incorporated in the Traffic Study, which was used to prepare the Transportation and Circulation section of the Draft EIR. Caltrans also submitted a written comment on the Draft EIR (Comment Letter No. 4) but did not identify any planned or potential improvements to the intersection of Bundy Drive and the 1-10 Freeway eastbound on-ramp. As described on page IV.J-45 of the Draft EIR, due to physical constraints at this location, no feasible mitigation measures were identified.

COMMENT LETTER No. 7

Friends of Sunset Park
Board of Directors
P.O. Box 5823,
Santa Monica, CA 90409-5823
November 10, 2006
[E-mail date: November 13, 2006]

Signed By:
Zina Josephs, FOSP Board President
Tom Cleys, FOSP Vice President
Charlie Donaldson, FOSP Secretary
John Reynolds, FOSP Treasurer
Eric Gabster, FOSP Board Member
Susan Hartley, FOSP Board Member
Emmalie Hodgkin, FOSP Board Member
Gail Myers, FOSP Board Member
Lorraine Sanchez, FOSP Board Member

Comment No. 7.1

The Board of Friends of Sunset Park, a city-recognized neighborhood organization which represents residents in the area of Santa Monica bordered by Pico Blvd. on the north, Lincoln Blvd. on the west, the south city limits, and the east city limits (Centinela Ave.), has the following comments regarding the Bundy Campus Master Plan and EIR.

In spring 2005, the FOSP Board took a position to oppose all large developments unless traffic impacts on our residential neighborhoods could be mitigated. While supporting the educational mission of Santa Monica College, the FOSP Board took the position in October 2005 that

1. parking on the Bundy Campus should be limited to the then-current 609 parking spaces, and that
2. any access to Airport Avenue be “egress only,” with permanent “right-turn-only” restrictions to prevent cars from turning west toward 23rd St.

Response No. 7.1

This comment does not raise any issues regarding CEQA or the adequacy of the EIR. Nonetheless, as described in detail in Section IV.J (Transportation and Traffic) of the Draft EIR, limiting Bundy Campus parking to 609 parking spaces would not provide sufficient parking for the Bundy Campus and could result in adverse parking impacts in the surrounding neighborhood. The access scenario identified by the commenter is one of many Access Alternatives analyzed in the Draft EIR traffic analysis. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

Comment No. 7.2

The new Bundy Campus Master Plan and draft EIR document shows an additional 2-story classroom, 780 parking spaces, 5,317 daily car trips in 2010, and recommends “full access” (“in-an-out” and “right-and-left-turns-allowed”) for the Bundy Campus at Donald Douglas Loop South and Airport Ave.

Response No. 7.2

Although this comment does not address the adequacy of the Draft EIR, it should be noted that the Draft EIR does not identify an “additional” 780 parking spaces or 5,317 daily car trips associated with the Bundy Campus Master Plan. The Draft EIR correctly describes the Master Plan as resulting in the introduction of 171 additional parking spaces (see page II-10 of the Draft EIR) and approximately 2,877 additional daily trips (see page IV.J-28 of the Draft EIR). While the commenter has correctly identified one of the 16 access alternatives studied in the Traffic Study (i.e., Access Alternative B4) which would involve full access to Airport Avenue at Donald Douglas Loop South, it should also be noted that Mitigation Measure J-2 recommends a left turn prohibition out from the driveway at Donald Douglas Loop South onto Airport Avenue during between 7:00 and 9:00 a.m. (see page I-25 and page IV.J-46 of the Draft EIR). This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR.

Comment No. 7.3

The college’s summary, presented at the Nov. 2nd meeting, shows the following:

1. The draft EIR analysis concludes that there would be no air quality or public safety impacts from completing the Master Plan.

Comment: How can the college double daily car trips (from 2,768 in the Kaku June 2005 memorandum to 5,317 in the new draft EIR) and not impact air quality in the surrounding residential neighborhoods? Residents who already need to keep windows closed due to the fumes from cars idling in front of their homes can attest to the impact that increasing traffic has on air quality in Sunset Park.

Response No. 7.3

This comment references a document prepared by Kaku Associates titled “June 2005 Memorandum re: Site Access Analysis of Santa Monica College Santa Monica Airport Campus.” This document was prepared prior to the first class offerings at the Bundy Campus. The document estimated the daily trip generation of the Bundy Campus as it currently operates (with 16 classrooms). The estimate was 2,989 daily trips. (The number 2,768 referenced in the comment refers to the number of vehicle trips generated by a proposed future campus with 27 classrooms and with a credit provided for the removal of the Shuttle Program. This number has no current reference as the Proposed Project studied in the Draft EIR is to expand the existing facility from 16 classrooms to 30 classrooms and there is no credit provided for the removal of the Shuttle Program.) It is worth noting that the June 2005 estimated number of trips (2,989)

matches very closely the actual count of trips generated in February 2006 (2,836). The Proposed Project (providing an additional 14 classrooms) is estimated to generate an additional 2,877 daily trips.

The Draft EIR provides an environmental analysis of potential air pollution from two perspectives: daily emissions and pollutant concentrations. As described in more detail in Section IV.C (Air Quality) of the Draft EIR, the proposed Bundy Campus Master Plan's impacts on regional and local air quality resulting from operational emissions would be less than significant without mitigation, and the impact on air quality resulting from localized levels of CO (Carbon Monoxide) at the study intersections would be less than significant without mitigation.

Comment No. 7.4

How can the college recommend increasing the volume of traffic into the Airport/Walgrove/Dewey/23rd intersection and claim that it will not impact public safety? This is a dangerous intersection located at the bottom of a steep grade on 23rd St., with two sharp, blind S-curves. That is why Traffic Management departments have already installed at least 6 guard rails, both along the curbs and along the center median, to keep cars from crashing into homes and into each other. Increasing the number of cars on southbound 23rd making left-turns onto Airport Ave. would be especially dangerous, as the center median guard rails prevent the southbound drivers from seeing on-coming northbound cars on Walgrove.

Response No. 7.4

The traffic analysis presented in the Draft EIR assesses the potential for the increased traffic generated by the project to result in significant traffic impacts at intersections and on street segments surrounding the Bundy Campus. The analysis, conducted according to the traffic study guidelines used by both adjoining cities, determined that with the proposed mitigation measure, no significant traffic impact would occur at the intersection of Airport Avenue & 23rd Street/Walgrove Avenue. The existing configuration of that intersection was assumed to remain unchanged in the study horizon year (2010) as no changes are currently planned by either the City of Santa Monica or the City of Los Angeles.

Comment No. 7.5

An FOSP member, Bill Follett, who has worked as a licensed professional driving instructor and has lived in New York City and San Francisco, as well as Santa Monica, describes this as "one of the most dangerous intersections I have ever encountered anywhere."

Response No. 7.5

This comment does not raise any issues regarding CEQA or the adequacy of the EIR. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

Comment No. 7.6

2. The analysis of the 16 alternative traffic access plans shows that the number of significant environmental impacts for vehicle circulation after mitigations are identical.

Comment: The traffic access alternatives which allow “in-and-out” and/or “left-and-turns-allowed” at Donald Douglas Loop South and Airport Ave. have environmental impacts that are significant for Sunset Park residents, in terms of both air quality and public safety. The impacts of all the alternatives are certainly not identical.

Alternatives that allow full access onto Airport Ave. from either Donald Douglas Loop South, the Spitfire Grill Driveway, or the 3400 Building Driveway, would bring more traffic through Sunset Park.

Isn't it true that alternatives A4, A7, A8, and B3 would have less impact on Sunset Park residents than the other alternatives?

Response No. 7.6

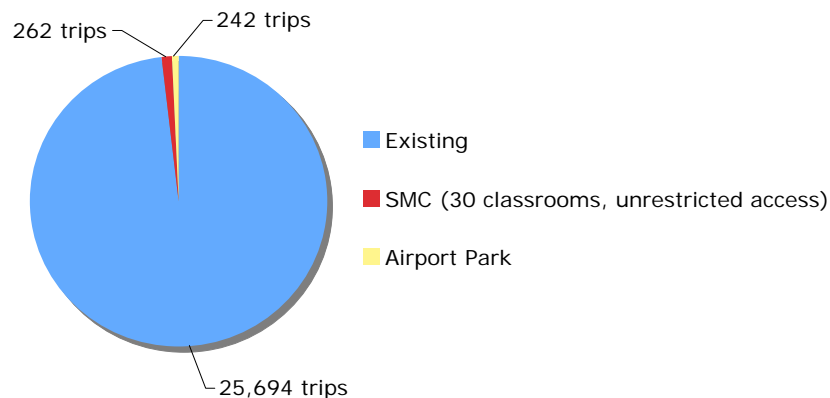
A number of Access Alternatives were evaluated, ranging from one that is most restrictive (a single entry and exit to Bundy Drive, Alternative A4) to one that is least restrictive (unrestricted entry and exit at two points, one leading to Airport Avenue and the other to Bundy Drive, Alternative B1). The Access Alternatives analysis was conducted entirely for the purpose of determining the most efficient access to and from the Bundy Campus that would result in the least traffic impacts.

As shown in Table IV.J-16 in Section IV.J (Transportation and Traffic) of the Draft EIR, after mitigation, all 16 of the Access Alternatives would result in significant traffic impacts on two or three street segments. All of these alternatives result in the addition of at least one car trip per day to the street segment of 23rd Street north of Airport Avenue. Under City of Santa Monica thresholds, this is considered a significant impact.

Furthermore, as shown in Table IV.J-15 in Section IV.J of the Draft EIR, after mitigation, all 16 of the Access Alternatives would result in significant traffic impacts at four intersections, all of which are located in the City of Los Angeles. None of the alternatives with mitigations result in any significant environmental impact to the intersection of 23rd Street/Walgrove Avenue and Airport Avenue.

Provided below is a visual diagram of existing and projected vehicle trips on 23rd Street north of Airport Avenue:

Daily Vehicle Trips on 23rd Street North of Airport Avenue



While the Draft EIR concluded that traffic impacts would be identical for all Access Alternatives (except for Access Alternatives C1 and C2 which would result in one additional street segment impacted), the Draft EIR did not conclude that all environmental impacts would be identical for all of the Project Alternatives studies. As is described in Section V (Alternatives to the Master Plan), the Draft EIR concluded that the Renovated East Building Alternative would have the fewest environmental impacts of all the Project Alternatives analyzed, although it would not satisfy the project objectives as fully as the Master Plan.

Comment No. 7.7

3. Two streets in Sunset Park (Dewey between 21st and 23rd, and 23rd between Airport and Ocean Park Blvd.) will be significantly impacted by increased traffic.

Comment: Doesn't this conclusion ignore that fact that any increased traffic on 23rd also impacts traffic on east-west residential streets such as Navy, Marine, Pier, Ashland, Hill, and Oak Streets, as well as Dewey.

When traffic is congested on 23rd, drivers try to find alternative routes and zoom along the east-west side streets trying to find another north-south route, such as 25th, 21st, 20th, 18th, 17th, 16th, etc.

Response No. 7.7

Tables 28 through 43 in Appendix G of Volume II, Technical Appendices to the Draft EIR, provide the analysis of trip generation on Navy, Marine, Pier, Ashland, Hill, Oak, and Dewey Streets.

The analysis shows that the Bundy Campus at buildout (30 classrooms) does not generate vehicle trips that reach the significance threshold for any of these streets other than Dewey. The significance threshold for Dewey Street is plus one car. The Bundy Campus at buildout is analyzed to add 25 project trips per

day to Dewey Street under the least restricted scenario and to add 12 car trips per day under the most restricted scenario.

Comment No. 7.8

4. Alternative B-4 will add only 165 car trips per day to 23rd St. and 18 car trips per day to Dewey.

Comment: Figure 7 in the Kaku November 2004 Site Access and Circulation Plan shows 12% of students traveling to and from the northwest via surface streets, and 7% of students traveling to and from the southwest via surface streets. That adds up to 19% traveling to and from the west. 19% of 5,317 daily car trips (the Kaku estimate for 2010 for the Bundy Campus) is 1010 daily car trips. It is difficult to understand how the college could recommend full access to Airport Ave., and then come up with a resulting increase of 165 plus 18, rather than 1010 daily car trips.

23rd St. north of Airport had 23,948 daily car trips in May 2004, according to the Kaku November 2004 Site Access and Circulation Report.

This is 9,000 more than the maximum of 15,000 daily car trips on collector streets, such as 23rd, recommended by City of Santa Monica guidelines.

The S.M. City Council voted that the “significance criteria” for collector streets with average daily car trips greater than 13,500 is one or more car trips per day. Therefore, the college adding even 1 car trip per day, let alone 165, or 1010 would have, by definition, a “significant impact.”

Response No. 7.8

Under Alternative B4, the Bundy Campus at buildout (30 classrooms) will add 262 vehicle trips per day to the 23rd Street segment north of Airport Avenue and 25 vehicle trips per day to the Dewey Street segment between 21st Street and 23rd Street.

Of these trips, the project (the addition of 14 classrooms) generates 122 trips and 12 trips respectively.

Parking for the existing 16 classrooms was provided at a lot north of Airport Avenue in the Fall of 2005 (the baseline semester in which vehicle counts for intersections and street segments were conducted). The unassignment and reassignment of vehicle trips from the lot north of Airport Avenue to the Bundy Campus resulted in a net change for the Bundy Campus at buildout (30 classrooms) of 165 car trips per day on 23rd Street and 18 car trips per day on Dewey Street.

Under no study scenario does the Proposed Project (the addition of 14 classrooms) or even the entire Bundy Campus project at buildout (30 classrooms), generate 1,010 daily car trips traveling to and from the west along Airport Avenue. Following is an explanation:

During the Fall 2005 semester, students attending classes at the Bundy Campus parked on the site of the former Shuttle Lot north of Airport Avenue. These students were free to arrive and depart to the east or

to the west. 7.5% of these students arrived and departed to the west along Airport Avenue and 92.5% of these students arrived and departed to the east along Airport Avenue.

Applied to the Bundy Campus at full buildout (30 classrooms), this implies a theoretical maximum trip generation along Airport Avenue of 399 trips per day two-way (arrival and departure) or a theoretical minimum trip generation of 200 trips per day one-way (arrival only).

The traffic analysis examines a number of scenarios, ranging from unrestricted (ingress and egress from Bundy Drive and from Airport Avenue, Scenario A1) to very restricted (access only from Bundy Drive, Scenario A4). These two scenarios can be considered to correspond to the theoretical maximum and theoretical minimum.

Under Scenario A1, which provides unrestricted access, the Draft EIR traffic analysis estimates a maximum trip generation for the Bundy Campus at buildout (30 classrooms) along Airport Avenue to the west of 495 trips per day. Under Scenario A4, the most restricted, the Draft EIR traffic analysis estimates a maximum trip generation for the Bundy Campus at buildout (30 classrooms) along Airport Avenue to the west of 239 trips per day.

Some of the student traffic heading west on Airport Avenue turns south to Venice and Mar Vista; some proceeds straight (west) to Santa Monica residences in the southern portion of the 90405 zip code; and the balance turns north up 23rd Street. The determination of where traffic heads is based on Figure IV.J-6, the distribution of student addresses by zip codes (which updates Figure 7 referenced in the comment above, but contains identical conclusions).

Under Scenario A1, unrestricted access, the trip generation along the street segment of 23rd Street north of Airport Avenue for the Bundy Campus at buildout (30 classrooms) is 262 trips per day and under Scenario A4, the most restricted, is 127 trips per day. The comparable numbers for Dewey Street between 21st Street and 23rd Street are 25 trips per day and 12 trips per day.

In comparison, Airport Park will generate 628 trips per day, according to an analysis prepared in June 2002. Forty percent of these trips are estimated to be from the west from Santa Monica and 10% from the north. The trip generation for Airport Park along the street segment of 23rd Street north of Airport Avenue is 242 trips per day. (The trip generation for Dewey Street was not analyzed.)

Table IV-1, below, summarizes the trip generation on 23rd Street north of Airport Avenue for the Bundy Campus as compared to existing conditions (Fall 2005) and Airport Park trips, under the each of the following scenarios: as presented in the Draft EIR, as recommended by the Friends of Sunset Park, and as recommended by the Santa Monica Airport Commission.

**Table IV-1
Traffic on 23rd Street North of Airport Avenue**

Conditions	Trips Per Day
<i>Summary of Trip Generation on 23rd Street north of Airport Avenue (Reflecting Recommendations of Santa Monica College)</i>	
Existing (Fall 2005)	25,694
Bundy Campus (30 classrooms), unrestricted access	262
Airport Park	242
<i>Summary of Trip Generation on 23rd Street north of Airport Avenue (Reflecting Recommendations of Friends of Sunset Park)</i>	
Existing (Fall 2005)	25,694
Bundy Campus (16 classrooms), restricted access	68
Airport Park	242
<i>Summary of Trip Generation on 23rd Street north of Airport Avenue (Reflecting Recommendations of Airport Commission)</i>	
Existing (Fall 2005)	25,694
Bundy Campus (30 classrooms), restricted access	127
Airport Park	242
<i>Source: Santa Monica College, January 2007.</i>	

Comment No. 7.9

Kaku also has failed to rate all the intersections that would be affected by campus traffic including 23rd and Pico, and Ocean Park Blvd. and 28th. The ones it has rated seem to change in a way that defies logic.

For example, the November 2004 report, in Table 5, showed the LOS (“level of service”) at Airport and 23rd to be “F” in the AM, with “oversaturated conditions” so that the actual “delay cannot be calculated, and “D” in the PM. The footnote [a] stated that the “intersection is two-way stop controlled,” which implies that Kaku only considered east-west traffic on Airport, not north-south traffic on 23rd/Walgrove, which is the real problem for residents.

The Kaku June 2005 memorandum changed that rating to “A” in the AM and “B” in the PM. (No explanation was given for that dramatic improvement, and it certainly didn’t correspond to the real-world experience of residents.)

In the Draft EIR, 23rd/Walgrove and Airport is variously described as “E” and “F” in the AM and “B” and “C” in the PM.

Walgrove and Rose, one block south, is always described as “F” in the AM, and “F” in the PM.

23rd and Ocean Park Blvd. is described as “D” in the AM, and “F” in the PM.

If 23rd/Walgrove and Airport were studied from the north-south 23rd/Walgrove aspect, we think the rating would be “F,” just like Walgrove and Rose.

[See Tables IV.J-5, J-7, and J-8]

Response No. 7.9

The scope of the traffic analysis prepared for the Draft EIR was discussed with staff of both the Cities of Santa Monica and Los Angeles at the outset of the study. Extensive input was received and incorporated regarding the locations that should be evaluated for potential project impacts. Analysis of the two intersections cited in the comment was not requested. Based on the fact that no significant project-related impacts were identified at intersections near those two locations that were evaluated (20th Street and Pico Boulevard, Cloverfield Boulevard and Pico Boulevard, 23rd Street and Ocean Park Boulevard, and Cloverfield Boulevard and Ocean Park Boulevard), it is reasonable to conclude that no significant impacts would result from the proposed project at either location.

Comparing the existing levels of service calculated in the Draft EIR with what is shown in a prior planning study for the Project Site (*Santa Monica College Bundy Campus Site Access and Circulation Plan*, Kaku Associates, Inc. November, 2004), which reported existing levels of service for several of the intersections analyzed in the Draft EIR, reveals that the majority of intersections had the same or worse levels of service. It is not uncommon for traffic to vary slightly from day to day at a given location. Because the baseline traffic data used in the Draft EIR traffic analysis was collected during normal conditions in September 2005, they can be said to accurately reflect current conditions in the study area.

The methodology used to analyze the intersection of Airport Avenue and 23rd Street/Walgrave Avenue is discussed above in the response to Comment No. 5.32. As discussed there, the intersection level of service is based on the delay experienced by the most constrained approach to the intersection (the westbound approach), rather than by the northbound and southbound through traffic, which is uncontrolled.

The levels of service cited in the comment for this intersection (LOS A in the a.m. peak hour and LOS B in the p.m. peak hour) were reported in a technical memorandum prepared during the planning process for the site (Table 2 in "Site Access Analysis of SMC Bundy Campus," Kaku Associates, Inc. June 28, 2005) and represent the levels of service there using the HCM methodology if the intersection were signalized. The actual levels of service experienced by motorists at that intersection are shown in that table to be LOS F in the a.m. peak hour and LOS B in the p.m. peak hour. These existing levels of service are very similar to what is shown in the Draft EIR (LOS E in the a.m. peak hour and LOS B in the p.m. peak hour) and, as noted above, it is not uncommon for traffic to vary slightly from day to day at a given location.

The Draft EIR (page IV-J.47) acknowledges that 23rd Street/Walgrave Avenue is heavily-utilized by both local and through traffic, as it is "part of a travel corridor that provides the only channel for north-south through traffic between Centinela Avenue and Lincoln Boulevard." The intersection analysis provided in the Draft EIR calculates operating conditions at each analyzed intersection separately, as is typical, rather than simulating traffic flow along a series of corridors.

Comment No. 7.10

Peak college-related traffic is estimated by Kaku to occur from 9 to 10am, and from 5:45 to 6:45 PM (this is when southbound traffic on 23rd/Walgrave tends to back up from Washington Blvd. to Pico Blvd.).

Response No. 7.10

It is acknowledged that existing traffic on 23rd Street is heavy during much of the p.m. peak period. As stated on pages 15-16 of Appendix G to the Draft EIR, the traffic impact analysis projected p.m. peak hour traffic generated by the Proposed Project between 5:45 p.m. and 6:45 p.m. on the peak hour of background traffic between 4:00 and 6:00 p.m. A review of daily traffic volume data on streets in the area indicated that background traffic volumes between 6:00 and 7:00 p.m. are similar to those occurring in the peak one hour between 4:00 and 6:00 p.m. This represents a conservative approach to projecting future traffic conditions.

Comment No. 7.11

In the “Mitigation” section, the impact on 23rd St. and Dewey St. is considered significant and unavoidable under all Access Alternatives. We disagree. We think that Access Alternatives A4, A7, A8, and B3 would mitigate traffic impacts on 23rd and Dewey. [See page IV. J-23]

Response No. 7.11

It is unclear on what basis the commenter believes that Access Alternatives A4, A7, A8, and B3 would mitigate the significant street segment impacts on 23rd Street north of Airport Avenue and Dewey Street between 21st Street and 23rd Street. As is clearly outlined in Table IV.J-12 in Section IV.J (Transportation and Traffic) of the Draft EIR, the City of Santa Monica’s threshold of significance for these two street segments is one car trip per day. None of the four Access Alternatives identified by the commenter would ensure that less than one car trip per day traveled to or from the Bundy Campus along either of the two impacted street segments. Therefore, a significant and unavoidable impact would remain at these two street segments under all Access Alternatives.

Comment No. 7.12

5. Traffic comparison to “previous uses” showing 33% less traffic in the AM and 9% more traffic in the PM.

Comment: Whatever the number of Bundy Campus daily car trips turns out to be, it will be on top of traffic from:

- The SMC Airport Arts Campus (239 parking spaces generating about 1142 daily car trips on Airport Ave.),
- An estimated 1,000 daily car trips on Airport Ave. from the new Airport Park,
- Airport staff, pilot, and maintenance crew traffic on Airport Ave.
- Leased properties on the non-aviation land at the Airport. (Since the non-aviation land is not zoned, since all current leases expire in 2015, and since S.M. Planning staff has not included

Airport property in the General Plan update, we may see some tremendous increases in traffic from possible future development of that land.)

- Playa Vista Phases I and II, increasing traffic congestion on Lincoln, 23rd/Walgrove, and Centinela/Bundy
- Increased development in Marina del Rey (in addition to Costco), especially on Redwood and Glencoe just south of Washington Blvd., which is increasing traffic congestion on Washington Blvd., Walgrove Ave., and 23rd St.

Response No. 7.12

The Draft EIR includes the current trip generation and intersection turn movements for existing uses based on new counts. The Draft EIR also includes the trip generation estimate for related projects as identified by the City of Los Angeles and the City of Santa Monica in Tables 7 and 8 of Appendix G of Volume II. As a point of clarification, the fifth page of Table III-1 in the Draft EIR and Table 8 of Appendix G to the Draft EIR inadvertently indicate a reduction for the removal of the former SMC shuttle lot on the site of the park. In fact, no such adjustment was made in the traffic analysis for the removal of that use, as it was no longer in place when the baseline traffic data used in the Draft EIR traffic analysis was conducted. As such, Section III (Corrections and Additions to the Draft EIR) includes corrections to Table III-1 of the Draft EIR and Table 8 to the Traffic Study.

Comment No. 7.13

The understanding of the FOSP Board is that the Santa Monica City Council granted the college “temporary access” to Airport Avenue at Donald Douglas Loop South in order for students to have a safe way to exit the Bundy Campus onto northbound Bundy/Centinela, but only until the City of Los Angeles installs a traffic signal at a college driveway on Bundy. Why is SMC now considering “full access” onto Airport Avenue at DDLS and additional access next to the Spitfire Grill and the 3400 Building on a permanent basis?

Response No. 7.13

The Draft EIR traffic analysis evaluated numerous access alternatives for the Project Site, including several which assume that the existing access to Airport Avenue will be maintained and/or modified. The range of alternatives was selected in order to provide the public and the Decision-Makers with information regarding the potential consequences of the means of accessing the site that have been discussed.

Comment No. 7.14

Lastly, we’ve been told by various SMC officials that they are not bound by any Master Plan:

- a. SMC official Don Girard during a summer 2005 meeting with FOSP Board members Tom Cleys, Eric Gabster, and Lorraine Sanchez;

b. Bundy Campus Provost Marvin Martinez in a conversation with Zina Josephs and Bob Fitzpatrick (Mar Vista Community Council member) on August 5, 2005;

c. SMC Board of Trustees Chair Carole Currey in a phone conversation with Zina Josephs on October 9, 2005.

So we really have no way of knowing what the future Bundy Campus traffic impacts on Sunset Park might be, if campus traffic is allowed to pass freely through our neighborhood.

Response No. 7.14

The Bundy Campus Master Plan is a blueprint for the development of the Bundy Campus that was developed following a College-wide review of educational needs. The Bundy Campus Master Plan meets the long-term educational needs of Santa Monica College. The Draft EIR for the Bundy Campus Master Plan provides a detailed analysis of the traffic impacts of the Bundy Campus Master Plan at buildout, under scenarios in which traffic flow is restricted and under scenarios in which traffic flow is not restricted. While the College fully intends to follow the Bundy Campus Master Plan, it should be noted that any substantial change to the Master Plan would require additional environmental analysis under CEQA.

Comment No. 7.15

Therefore, the Board of Friends of Sunset Park, while supporting the educational mission of Santa Monica College, but in order to mitigate traffic impacts from the Bundy Campus on our residential neighborhoods, strongly recommends that:

1. Parking on the Bundy Campus be limited to the current 609 parking spaces, and that
2. Any access to Airport Ave. be limited to “egress only” with permanent “right-turn-only” turn restrictions to prevent cars from turning west toward 23rd St.

Response No. 7.15

This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. Nonetheless, as described in detail in Section IV.J (Transportation and Traffic) of the Draft EIR, limiting Bundy Campus parking to 609 parking spaces would not provide sufficient parking for the Bundy Campus and could result in adverse parking impacts in the surrounding neighborhood. The access scenario identified by the commenter is one of many Access Alternatives analyzed in the Draft EIR traffic analysis. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 8

Keith Lambert, Zone 6 Director
Mar Vista Community Council
12618 Everglade St.
Mar Vista, CA 90066
December 1, 2006
[E-mail date: November 13, 2006]

Comment No. 8.1

I would like to respond to the Draft Environmental Impact report for the Bundy Campus Master Plan dated September 29th 2006. My response is for myself as a concerned and impacted neighbor as well as being an elected member of the Mar Vista Community Council as the Director for Zone 6. Zone 6 is the most heavily impacted residential area by this Bundy Campus Master Plan.

The previous Zone 6 Director Mr. George Chung has been working tirelessly to get the MVCC included in the formation of the understandings between the City of Los Angeles and the College and the City of Santa Monica. If the two cities issues were worked out in open dialogue with input from Mr. Chung and the MVCC ad hoc committee on the Bundy Campus many of the deficiencies of the Draft EIR would possibly have been avoided.

It is appreciated that the benefits to the community by the community college are great and that the investment in the site will be substantial, yet there are still more items that can be addressed and measures taken to protect the community and mitigate the definite adverse impacts that will be felt. Many of my stakeholders have expressed these issues to me. For two years prior they expressed the problems to Mr. George Chung while he was the Zone 6 Director.

Response No. 8.1

This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

Comment No. 8.2

The Draft EIR is not addressing the Mar Vista Community Council resolution on the SMC Bundy Campus. This resolution stipulates a series of items that the local community and this city government arm feels must be addressed. These Items are important. They need to be addressed and possibly need specific mitigating measures prior to the approval of the EIR. The failure to address the points in this Draft EIR is a definite problem that must not be overlooked in the final EIR.

Each of the issues and sections covered by that resolution by the Mar Vista Community Council needs to be specifically discussed in the EIR and responded to in a way that sets out to review where it will be met or where it will not be met. Each of the places where the items will not be met needs to have an offsetting

benefit and as many mitigation measures as possible to offset those extra impacts that the community surrounding the Santa Monica Bundy Campus will have to endure because of this new master plan.

Response No. 8.2

The specific reference to the Mar Vista Community Council Resolution is understood to be the resolution found in Appendix B of the Draft EIR (Responses to the NOP) as Attachment “A” to the Mar Vista Community Council’s letter dated October 22, 2005. The issues presented in the Resolution are primarily mandates towards the operating conditions and size of development. Other issues raised in the Resolution, such as site access, traffic impacts, compliance measures, project alternatives, the Bundy Campus’ relation to other SMC satellite campuses, zoning consistency, and identification of the lead agency, can all be found in the respective sections of the EIR. The Santa Monica Community College District is the Lead Agency for the Proposed Project.

Comment No. 8.3

In order to address the enlarging and changing of the use of the site the closing of the Stewart Street gate must be a specific mitigating measure as per this EIR. The City of Los Angeles residential streets are going to take an inordinate amount of new and repetitive traffic in order for this new use to be accommodated. The new use must mitigate the impact to the residential streets where possible and use major arteries wherever possible. Therefore the Stewart Street Gate must be specifically addressed by the EIR as an agreed to mitigating measure and not used henceforth.

Response No. 8.3

The use of the Stewart Avenue gate is part of the project description of the Bundy Campus Master Plan as well as the Project Description in the Draft EIR. Upon approval of the Bundy Campus Master Plan by the Santa Monica College Board of Trustees, page II-9 in Section II (Project Description) of the Draft EIR states, “...SMC will not use Stewart Avenue for faculty, staff, student, visitor, or vendor ingress or egress to the Bundy Campus. The Stewart Avenue access is controlled by a gate which shall only be opened in an emergency or when necessary to perform routine maintenance activities on the wall or parkway west of the wall. When the gate is opened for routine maintenance activities, SMC will have personnel present to ensure that faculty, staff, students, visitors, or vendors do not enter or exit the Bundy Campus through the Stewart Avenue gate.”

Comment No. 8.4

In section III B. related projects number 113 reviews the Airport Park. This is a significant change to the amount of activity in the local flow of people in and around the area. The finished park with its new traffic must be included in the EIR numbers. The City of Santa Monica may need to cooperate better with the City of Los Angeles and the College to enable the interaction of the two complimentary uses to work better together. The pedestrian vehicular transitions between these two sites are not sufficiently discussed in the Draft EIR. The City of Santa Monica had allowed more interaction with this site for the past users. Now the driveways are being closed off and the Draft EIR refers to them at length even though it is clear

that some of them will not be accessible unless the City of Santa Monica makes new access. This must be revisited in the Final EIR to state what access points on the north side are to be opened and what ones are going to remain closed. If these access points are to remain closed then additional mitigation measures will be needed to offset the amount of traffic that will be forced to only use the Bundy and Donald Douglas Loop exit points.

Response No. 8.4

Traffic projections for Airport Park are included in the traffic analysis in the Draft EIR. As correctly identified by the commenter, Airport Park is included as a related project in the Draft EIR (see Related Project No. 113 in Table III-1, Related Projects List, and Figure III-9, Related Projects Location Map, in the Draft EIR). Airport Park is also included in Table 8, Trip Generation Estimates for Related Projects in the City of Santa Monica, Appendix G, Traffic Study, Volume II, Technical Appendices to the Draft EIR. Therefore, traffic associated with the Airport Park has been included in the cumulative traffic analysis, as well as the other cumulative analyses in the Draft EIR, as appropriate. See prior response to Comment 7.12 for additional clarification. The Draft EIR provides the analysis needed to study circulation scenarios that use only the Bundy Drive roadways and an access route to the Bundy Campus from the intersection of Airport Avenue and Donald Douglas Loop South. As a point of clarification, as stated in the prior response to Comment 7.12, the fifth page of Table III-1 in the Draft EIR and Table 8 of Appendix G to the Draft EIR inadvertently indicate a reduction for the removal of the former SMC shuttle lot on the site of the park. In fact, no such adjustment was made in the traffic analysis for the removal of that use, as it was no longer in place when the baseline traffic data used in the Draft EIR traffic analysis was conducted. As such, corrections to Table III-1 of the Draft EIR and Table 8 to the Traffic Study have been included in Section III (Corrections and Additions to the Draft EIR) of this Final EIR. These corrections do not change the findings or conclusions in the Draft EIR.

Comment No.8.5

Noise during demolition and construction will not be an insignificant item to the homes immediately to the South of the property. If this property were in Santa Monica would not more sound protection be afforded the homes affected? As the Santa Monica College endeavors to be a good neighbor it would be better if it mitigated its' sound and nuisance with the same level of mitigation as if it were in the City of Santa Monica.

Response No. 8.5

The Draft EIR does not state that impacts related to construction noise would be insignificant. The Draft EIR states that, even with mitigation, which would require the reduction of noise in conformance with Section 112.05 of the Los Angeles Municipal Code, the Proposed Project would still result in a significant and unavoidable impact with respect to construction noise.

While the City of Santa Monica provides numerical thresholds for noise standards, the City of Los Angeles requires that construction noise be reduced to the extent "technically feasible," (LAMC Sec.

112.05), which may be more, equal to, or less stringent than as required under City of Santa Monica noise standards.

As described in the response to Comment No. 5.16, it should be noted that the Draft EIR recommends more stringent restrictions on the hours of construction activities related to the buildout of the Master Plan than are required by the City of Los Angeles Noise Ordinance.

Comment No. 8.6

Demolition dust and particulate fouling the air will likely be born down wind in significant amounts to be a health hazard to the residences east of the property. The mitigation measure of just watering to reduce dust is insufficient to protect the health of those who are sensitive to elevated particulate. Especially when that particulate could have lead paint and other potentially dangerous material in it. Therefore as an additional mitigation measure the residences down wind could be notified of the specific Day(s) and Times that the work will take place so that they can further protect themselves by closing windows and/or relocating for the day(s) of higher dust and debris in the air.

Response No. 8.6

The mitigation measures prescribed in Section IV.C (Air Quality) of the Draft EIR follow SCAQMD Rule 403 guidelines and would adequately mitigate the Master Plan's construction emission impacts to a less-than-significant level. Refer to Tables IV.C-6 and IV.C-7 on pages IV.C-25 and IV.C-26 of the Draft EIR, which show that on-site emissions generated at the Bundy Campus during the various phases of construction would not exceed the established regional or localized emissions thresholds recommended by the SCAQMD.

Furthermore, Section IV.G (Noise) of the Draft EIR includes mitigation requiring notification of surrounding residential uses disclosing the construction schedule two weeks prior to the commencement of demolition and construction at the Bundy Campus. See Mitigation Measure G-4, as amended per Section III (Corrections and Additions to the Draft EIR) of this Final EIR.

Overall, the College is confident that it has exhibited a "good faith effort at full disclosure" in the Draft EIR of all potential environmental impacts of the Bundy Campus Master Plan, including those associated with air quality. Therefore, this comment does not require any additions or corrections to the Draft EIR.

Comment No. 8.7

The New Driveway has a health impact not covered. The environmental impact of the long uphill driveway is not fully examining the heavy intensity of exhausts as the new light turns green and long lines of cars accelerate up a hill. The new and concentrated environmental impacts of the fumes will severely and adversely impact the homes and lives of those immediately to the East. Downwind residents of the airport are subject to severe impacts of the jet and airplane fumes. These impacts include severe health concerns for their eyes and lungs. Similarly the long line of cars chugging at the same time up the long steep driveway will send concentrated plumes of auto and bus exhaust into the back yards and windows

of those homes. This new driveway will be a new funnel point that they will have to accept with no Mitigation being offered. There must be more effort to reduce the environmental impact for the homes on the East side of the project.

Response No. 8.7

See response to Comment No. 8.6, above. The Bundy Campus Master Plan, as currently proposed, was designed based on the results of an approximate one-year long scoping process which included City of Santa Monica and City of Los Angeles neighbors as well as SMC faculty and staff, City of Los Angeles, City of Santa Monica, and other agency officials, and other community stakeholders. After two community outreach meetings held in March 2005, and several follow-up meetings with neighborhood organizations, SMC's architects redesigned the Master Plan such that the existing Bundy Driveway at the southeast corner of the campus would be moved to the northeast corner of the campus. This design scheme was pursued at the request of the neighbors to the south of the Bundy Campus. The College is confident that it has exhibited a "good faith effort at full disclosure" through the incorporation of substantial input from neighbors to the south of the Bundy Campus in the design of the Master Plan and the preparation of the Draft EIR.

Comment No. 8.8

Traffic lanes for Deceleration and Acceleration on Bundy have not been sufficiently described in the Draft EIR and may make a big difference in the safety and flow of traffic. The design for the entrance and exit from the Bundy campus onto Bundy/Centinela is insufficient and definitely needs more input from DOT before the final EIR can be created.

Response No. 8.8

The design and construction for the entrance and exit from the Bundy Campus onto Bundy Drive requires the approval of the Los Angeles Department of Transportation (LADOT). LADOT provided the following comment on the Draft EIR (see Comment No. 6.11):

"LADOT has been working with SMC on the proposed half traffic signal. While a final traffic signal warrants analysis has not yet been completed by LADOT, SMC's traffic consultant (Kaku Associates, Inc.) has prepared a traffic signal microsimulation to evaluate how an additional signal would impact traffic flow along Bundy Drive. The results reveal that a new "half" traffic signal on Bundy Drive and the project driveway can be designed and timed in coordination with the existing signal at Airport Avenue and Bundy Drive with minimal impacts to traffic flow. The "half" traffic signal would provide a northbound left-turn arrow from Bundy Drive into the Campus driveway. Northbound through traffic would not be controlled by the signal at the driveway. With a left-turn arrow provided for northbound motorists destined for the campus, southbound through traffic would be stopped only when the northbound left-turn arrow is green. Sensors embedded in the roadway would trigger the need for the northbound left-turn green arrow. The exact placement of the driveway, the timing and coordination of the two traffic signals, and the configuration of the lane assignments for both intersections (Bundy Drive/SMC Driveway and Bundy Drive/Airport Avenue) are currently being evaluated." Based on these

comments provided by LADOT, SMC has consulted with, and is continuing to consult with and incorporate the recommendations of LADOT in the design of the proposed Northeast Bundy Driveway.

Comment No. 8.9

The Los Angeles city DOT has a response to the Draft EIR with its concerns. These are very important and I am very interested in seeing them responded too. Where my responses and the DOT responses overlap I hope you take extra precaution to clearly mitigate and cooperate to reduce the adverse impacts.

Traffic from the Bundy Campus onto Airport at Donald Douglass Loop may need to allow freer turning options or else the drivers who want to go west will go to Rose and Woodbine and Dewey and Palms to reach Walgrove and 23rd Street anyway. Still eventually passing through the intersection at Airport and 23rd but first having to circumnavigate though the residential areas of Mar Vista. Such cut-though traffic is very troublesome for the residences in the area as it is. The Draft EIR does not cover the Palms and Centinela or Palms and Beethoven intersections sufficiently. No sufficient mitigation measure is being offered at this time. Therefore with Centinela at peak times already at close to a stand still, forcing most of the Bundy Campus traffic out onto Centinela is an insufficiently addressed problem.

Response No. 8.9

The a.m. peak hour and p.m. peak hour turning movements of vehicles heading to and leaving the Bundy Campus at the intersection of Centinela Avenue and Palms Boulevard and the intersection of Centinela Avenue and Venice Boulevards are thoroughly analyzed for all access scenarios in Tables 11 through 26 of Appendix G (Traffic Study) to the Draft EIR and in Tables C1 through C31 of Appendix C to Appendix G. Because there are no environmentally adverse impacts at these intersections under any of the access scenarios, nor on the segment of Beethoven Street north of Palms Boulevard, it is reasonable to conclude that no significant impact would occur at the intersection of Palms Boulevard and Beethoven Street.

Comment No. 8.10

The Traffic Paths and area studied are failing to study the impacts of the “loop back” traffic that the right turn only situation at present is causing. This is applicable to both the Airport and Centinela exits.

Response No. 8.10

As described in the response to Comment No. 6.5, the impacts associated with the current operation of the Bundy Campus were evaluated under an Initial Study/Mitigated Negative Declaration (IS/MND) adopted by the College Board of Trustees in February 2004, which included a traffic analysis. The Draft EIR addresses those impacts that would result from buildout of the Bundy Campus Master Plan. The traffic analysis includes 16 different Access Alternatives, including some which involve right-turn only restrictions at Airport Avenue and at Bundy Drive and others that do not. As is described in detail in the response to Comment 7.6, after mitigation, all 16 of the Access Alternatives would result in significant

traffic impacts on two or three street segments and four intersections. Therefore, this comment does not require any additions or corrections to the Draft EIR.

Comment No. 8.11

It is not likely that both Bundy driveways will be needed if the new main one (that is anticipated to have the new light) will be sufficient. The input from LA DOT is definitely needed on the design and placement of this crucial part of the traffic and pedestrian flow. This may require some redesigning of the parking and roads on the front of the site. Therefore the Draft EIR does not show the details that many in the community are looking for.

Response No. 8.11

As described in the response to Comment No. 6.11, the design of the new traffic signal on Bundy Drive is being reviewed by and is subject to the final approval of LADOT. The Proposed Site Plan, provided in Figure II-3 of the Draft EIR, provides a conceptual illustration of how the parking, circulation, and other physical characteristics of the Master Plan may appear at buildout. This comment does not require any additions or corrections to the Draft EIR.

Comment No. 8.12

There may be a way to alleviate the problems with other severely impacted points such as (intersection 5) Bundy and I-10. That may be the most important choke point. Why is no mitigation measure offered? (page IV.J-2) It is insufficient to offer no effort at all to alleviate the problem.

Response No. 8.12

As explained on page IV.J-45 of Section IV.J (Transportation and Traffic) of the Draft EIR, potential measures to mitigate the project-impact identified at the intersection of Bundy Drive and I-10 eastbound on-ramp were considered but were found to be infeasible due to physical constraints. The written comment letter submitted by Caltrans on the Draft EIR (see Comment Letter No. 3) did not identify any planned or potential improvements to the intersection of Bundy Drive and the I-10 Freeway eastbound on-ramp. See also response to Comment No. 6.15.

Comment No. 8.13

The EIR needs to address the above points. The level of impact to the community will be significant even after the currently offered mitigations. Therefore changes to the EIR are needed before it can be approved. I look forward to the project moving forward at that time.

If further clarification of the parts of the Draft EIR I am responding to is needed you may contact me for further information. Please use keith@MarVista.org as a good way to contact me.

Response No. 8.13

Comment noted. This comment will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 9

Eddie A. Arias
2388 Dewey Street
Santa Monica, CA 90405-6038
October 29, 2006

Comment No. 9.1

According to the Kaku Traffic Study, 19% of the 5317 car trips will come and go to the southwest and northwest, and the plan includes alternatives with full access to Airport Ave. That would bring about 1,000 additional daily car trips into the Airport/Walgrove/23rd intersection. That is unacceptable to me.

This intersection already has 24,000 cars per day (9,000 over the maximum of 15,000 for feeder streets such as 23rd).

I strongly urge that we maintain the current “exit only, right-turn only” Bundy Campus access to Airport Ave. (directing traffic to 4-lane Centinela/Bundy, rather than 2-lane 23rd).

Response No. 9.1

The commenter does not raise any specific issues regarding the adequacy of analyses contained in the Draft EIR. The access scenario identified by the commenter is one of many Access Alternatives analyzed in the Draft EIR traffic analysis. It should be noted that under no study scenario does the Proposed Project generate 1,000 daily car trips traveling through the intersection of Airport Avenue and 23rd Street/Walgrove Avenue (refer to Section IV.J (Transportation and Traffic) of the Draft EIR, and the response to Comment No. 7.8 previously provided). This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 10

From: "Eddie Arias" eddiearias@ca.rr.com.
Subject: Master Plan & EIR for the Bundy Campus
To: "LAWSON_RANDAL" <Lawson_Randal@smc.edu>
Reply-To: "Eddie Arias" 4someone@gmail.com
Date: Sun, 12 Nov 2006 11:01:12 -0800

Comment No. 10.1

I support the educational mission of Santa Monica College. However, in order to mitigate traffic impacts from the Bundy Campus on our residential neighborhoods, I strongly recommend that:

- 1) Parking on the Bundy Campus be limited to the current 609 parking spaces
- 2) Any access to Airport Ave. be limited to "egress only" with permanent "right-turn-only" turn restrictions to prevent cars from turning west toward 23rd St.

Response No. 10.1

This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. Nonetheless, as described in detail in Section IV.J (Transportation and Traffic) of the Draft EIR, limiting Bundy Campus parking to 609 parking spaces would not provide sufficient parking for the Bundy Campus and could result in adverse parking impacts in the surrounding neighborhood. The access scenario identified by the commenter is one of many Access Alternatives analyzed in the Draft EIR traffic analysis. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 11

From: [Elaine Becker] elainebecker@verizon.net [mailto: emailbecker@verizon.net]
To: LAWSON_RANDAL
Subject: Bundy Campus
Sent: Friday, November 03, 2006 2:46 PM

Comment No. 11.1

While I enjoy the advantages of Santa Monica College and am a graduate of the nursing program, I cannot support the Bundy Campus traffic access from Airport Avenue to Walgrove/23rd Street. That street is already severely and negatively impacted with traffic.

Please do not further contribute to the declining lifestyle of the Sunset Park community.

Response No. 11.1

This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. The access scenario identified by the commenter is one of many Access Alternatives analyzed in the Draft EIR traffic analysis. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 12

From: "Johnny S. Beyers" <johnnybeyers@hotmail.com>
Subject: RE: FOSP: Nov. 13th deadline to comment on Bundy Campus EIR
To: <ZinaJosephs@aol.com>
Cc: "LAWSON_RANDAL" <Lawson_Randal@smc.edu>
Date: Mon, 13 Nov 2006 05:04:45 -0800

Comment No. 12.1

What a horrendous mistake Mr. Lawson is making for this community. Thank-You for your Updates. As far as I know . . . ALL of Sunset Park is against this huge mistake of the Bundy Expansion and traffic demons it will unleash.

Response No. 12.1

This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 13

From: [Mitchell Block] MWBLOCK@aol.com [mailto: MWBLOCK@aol.com]
To: LAWSON_RANDAL; TSANG_CHUI; Council@smgov.net; Lamont.Ewell@smgov.net
Cc: ZinaJosephs@aol.com; Rod.Merl@smgov.net
Subject: Do Not Permit Access to SMC from Airport Avenue it Endangers Children
Sent: Sunday, November 12, 2006 10:50 AM

Comment No. 13.1

Summary: Because of the use of the Airport by both tenants, cut through traffic and the pending park for children's sports we are OPPOSED to ANY USE of AIRPORT AVENUE by Santa Monica College since this will increase traffic on the Airport Access Road (Airport Ave) which is already more than the service road can accommodate.

We believe that “any access to Airport Avenue be ‘egress only,’ with permanent ‘right-turn-only’ restrictions to prevent cars from turning west toward 23rd St.” does not address our concern about traffic, traffic flow and traffic speed, since this plan will increase traffic in the park area of the Airport and needlessly endangers children and their parents using our new park.

Response No. 13.1

Comment noted. The Draft EIR traffic analysis examines a number of scenarios, ranging from unrestricted to very restricted. The access scenario identified by the commenter is one of many Access Alternatives analyzed in the Draft EIR traffic analysis (i.e., Access Alternative A4). It should be noted that, as both the Bundy Campus and the Airport Park have their own respective parking lots, campus traffic (both vehicular and pedestrian) is not expected to enter the Airport Park area, or vice versa. This comment will be forwarded to the Decision-Makers for their consideration.

Comment No. 13.2

We believe that the SMC purchasing the site in LA City (next to the Airport) for a college facility was ill advised from the start because of the traffic the site would generate and the inability of the area to absorb MORE traffic in a safe manner. Had the college done their purchase in public, the public would have advised them that this use of the site was not acceptable in terms of traffic. (Housing would have been a preferred use.) A smaller “better” college would be preferred.

We urge the City to insist that the College access this parcel ONLY from Bundy Avenue (and Stuart Avenue) and insist that the City of LA provide a traffic light for safe access as far from the Airport Avenue/Bundy traffic light as possible.

Response No. 13.2

This comment does not raise any issues regarding CEQA or the adequacy of the EIR. It should be noted that the Draft EIR traffic analysis evaluated multiple Access Alternatives for ingress and egress to and from the Bundy Campus.

Refer to Section VI (Alternatives to the Master Plan) of the Draft EIR for an analysis of a project alternative in which the Master Plan would not be adopted and implemented and campus would be developed with 625 multi-family residences (i.e., No Project Alternative (3)). As shown in Table VI-1 on pages VI-53 through VI-54 of Section VI, some of the environmental impacts associated with the Master Plan would be reduced under No Project Alternative (3), while other environmental impacts (including intersection and street segment impacts) would be increased. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 14

From: Phyllis Chavez [mailto: phyllis@phyllischavez.com]

To: LAWSON_RANDAL

Subject: Public comment Re: Bundy Campus Master Plan and EIR

Sent: Sunday, November 12, 2006 6:09 PM

Comment No. 14.1

As a resident of Sunset Park I am very concerned about the growing traffic issues in our neighborhood. We already have a serious traffic problem at the Airport/Dewey/23rd intersection. It is not just a matter of additional cars on our streets but also the public safety issues and environmental issues this additional traffic contributes to.

I do support the educational mission of Santa Monica College. I also support the environment, public safety and our need to have less traffic in our neighborhood. With this in mind I must strongly recommend:

1. Parking on the Bundy Campus be limited to the current 609 parking spaces, and that
2. Any access to Airport Ave. be limited to “egress only” with permanent “right-turn-only” restrictions to prevent cars from turning west toward 23rd St.

Response No. 14.1

This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. Nonetheless, as described in detail in Section IV.J (Transportation and Traffic) of the Draft EIR, limiting Bundy Campus parking to 609 parking spaces would not provide sufficient parking for the Bundy Campus and could result in adverse parking impacts in the surrounding neighborhood. The access scenario identified by the commenter is one of many Access Alternatives analyzed in the Draft EIR traffic analysis. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 15

From: [Marion Clark] Mystreee5@aol.com
To: "LAWSON_RANDAL" Lawson_Randal@smc.edu
Subject: Bundy Campus
Date: Wed, 1 Nov 2006 18:19:26 -0800

Comment No. 15.1

The current restrictions seem to be working well, but increasing the number of cars as proposed in the master plan, and allowing free access to Airport Avenue will make an already badly congested Walgrove Avenue into a traffic nightmare. I hope this will be taken into consideration as your plan progresses.

Please keep the access to Airport Avenue as it is now.

Response No. 15.1

This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. The access scenario identified by the commenter is one of many Access Alternatives analyzed in the Draft EIR traffic analysis. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 16

Carlos Cuadra
13213 Warren Avenue
Los Angeles, California 90066
November 3, 2006

Comment No. 16.1

I would like to express my concern about the plan that would, according to the Kaku study, bring about 1,000 additional daily car trips into the already crowded Airport/Walgrove/23rd Street intersection. As you know, all of these, unlike Bundy, are two-lane streets.

We have lived about a block and a half from this intersection for 53 years and have used it almost daily during that time. We have been watching --with growing dismay-- the traffic on 23rd Street south of Pico and at this intersection grow to the point where, on some days, it slows almost to a standstill.

For the past year, my trip between home and office, which takes less than 10 minutes at about 8:30 a.m., now takes nearly 30 minutes for the return trip at anytime between 5:00 p.m. and 7:00 p.m. I have tried a number of different routes and a number of different going-home times to avoid the heavy traffic, all

without much success. I have become somewhat resigned to the current traffic level but I am appalled at the thought that it could get worse.

I hope that anyone who proposes adding traffic to the Airport/Walgrove/23rd Street intersection will be willing to spend some time there on an afternoon or two to see for themselves what it is really like.

Response No. 16.1

This comment does not raise any specific question or comment regarding the adequacy of the analyses contained in the Draft EIR. It should be noted that under no study scenario does the Proposed Project generate 1,000 daily car trips traveling through the intersection of Airport Avenue and 23rd Street/Walgrove Avenue (refer to Section IV.J (Transportation and Traffic) of the Draft EIR, and the response to Comment No. 7.8 previously provided). This comment is noted for the record and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 17

From: Jane Dempsey [mailto: janedempsey@earthlink.net]

To: LAWSON_RANDAL

Cc: 'Jane Dempsey'

Subject: RE: comment on Bundy Campus EIR

Sent: Sunday, November 12, 2006 2:04 PM

Comment No. 17.1

My comment on the EIR is that parking on the Bundy Campus should be limited to the then-current 609 parking spaces, and that any access to Airport Avenue be "egress only," with permanent "right-turn-only" restrictions to prevent cars from turning west toward 23rd St.

Response No. 17.1

This comment does not raise any issues regarding CEQA or the adequacy of the analyses contained in the Draft EIR. Nonetheless, as described in detail in Section IV.J (Transportation and Traffic) of the Draft EIR, limiting Bundy Campus parking to 609 parking spaces would not provide sufficient parking for the Bundy Campus and could result in adverse parking impacts in the surrounding neighborhood. The access scenario identified by the commenter is one of many Access Alternatives analyzed in the Draft EIR traffic analysis. This comment is noted for the record and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 18

From: [Marla Eby] MEby@aol.com [mailto: MEby@aol.com]
To: LAWSON_RANDAL
Subject: Bundy Campus Plan
Sent: Monday, November 13, 2006 9:22 PM

Comment No. 18.1

I would like to voice my concern about the Bundy Campus EIR / traffic plan. We live on Navy Street and have suffered the effects of the traffic from the Bundy campus. We find it difficult to believe the survey that said that neighbors were not concerned about traffic - we were not surveyed and traffic is a serious concern in our neighborhood.

I am concerned that not even a year after the agreement with the neighborhood, city and college, the college is already trying to change the terms of the agreement. Right turn only on Airport Ave. should be maintained and not changed. The half light agreed upon by the college and city of Los Angeles has not even been installed and you are already looking to make changes.

Please live up to your end of the agreement to be a good neighbor and respect the wishes of the residents in the neighborhood.

Thank you.

Response No. 18.1

This comment does not raise any specific question or comment regarding the adequacy of the analyses contained in the Draft EIR. Nonetheless, the access scenario identified by the commenter is one of many Access Alternatives analyzed in the Draft EIR traffic analysis. This comment is noted for the record and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 19

From: "Cheryl Finney" <Finneyfam@adelphia.net>
Subject: Traffic
To: "LAWSON_RANDAL" <Lawson_Randal@smc.edu>
Date: Thu, 2 Nov 2006 07:36:40 -0800

Comment No. 19.1

We would like to keep the campus access to Airport Ave. with its current "exit-only, right-turn-only" status.

Thank you for your consideration.

Response No. 19.1

This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. Nonetheless, the access scenario identified by the commenter is one of many Access Alternatives analyzed in the Draft EIR traffic analysis. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 20

From: [T. Robert Fitzpatrick] <trface@aol.com>
Subject: Bundy Campus Master Plan Environmental Impact Report
To: "LAWSON_RANDAL" <lawson_randal@smc.edu>
Date: Mon, 13 Nov 2006 15:17:34-0800
[Letter date: November 13, 2006]

Comment No. 20.1

This email is in response to your Notice of September 29, 2006 inviting comments on the Draft EIR for the Bundy Campus of Santa Monica College.

I first incorporate by reference as though fully set forth herein the comments of Otis L. Hubbard in his undated letter which was provided to you on November 13, 2006 and the comments of Glen Howell as set forth in his letter to you dated November 10, 2006 and his Comments on Bundy Campus which were emailed to you on November 13, 2006.

Response No. 20.1

Otis L. Hubbard's comment letter dated November 13, 2006 is included herein as Comment Letter No. 29. Glen Howell's comment letters dated November 10, 2006 and emailed to SMC on November 13, 2006 are included in Comment Letter Nos. 26 and 27.

Comment No. 20.2

Any use of the Stewart Avenue Gate for other than emergency vehicles in an emergency would cause significant and irreversible adverse impacts to the nearby neighborhoods which cannot be mitigated. Thus, the Stewart Avenue Gate must remain permanently closed except for use by emergency vehicles in an emergency. A deed restriction providing for such closure so long as Santa Monica College or an affiliate owns the Bundy, Campus Site must be provided to ensure such permanent closure. Such a deed restriction is in accord with what the representatives of SMC have on many occasions promised the community, but have recently used such promised closure as a hostage to force the installation of a new signal on Bundy Drive. SMC has failed to provide for the promised permanent closure of the Stewart

Avenue Gate. If SMC would live up to its promises to the community there would be less resistance to the implementation of the Bundy Campus.

Response No. 20.2

As provided in the Bundy Campus Master Plan as well as the Draft EIR, the Stewart Avenue Gate will be used by SMC for emergency access and occasional maintenance access. A deed restriction is not required to restrict access for these purposes. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 21

From: Bill Follett [mailto: billfollett@adelphia.net]
To: LAWSON_RANDAL
Cc: TSANG_CHUI
Subject: FW: Bundy Campus Traffic Issues
Sent: Saturday, November 11, 2006 12:27 PM

Comment No. 21.1

The attached letter was originally addressed and sent to Dr. Thomas Donner, then the Interim Superintendent/President at Santa Monica College, on October 24th of last year. I have readdressed it to you for your consideration now. Nothing has changed regarding the extreme hazards of the 23 St./Airport Ave. intersection in the past year. Thankfully, Santa Monica College decided a year ago to have a “right turn only” exit from the Bundy campus parking lot onto Airport Avenue. As you know, that remains the case now. This has helped and continues to help protect the safety of the students of SMC. It also helps protect the safety of the many travelers winding their way up and down and around 23 St. at that hilly, complex s-bend intersection with Airport and Dewey.

Please read the attached letter, and please continue to put safety first by keeping the Bundy campus traffic directed only towards Bundy, and away from the dangerous 23 St./Airport Ave. intersection. Thank you.

Response No. 21.1

This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. Nonetheless, the access scenario identified by the commenter is one of many Access Alternatives analyzed in the Draft EIR traffic analysis. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 22

William Follett

1808 Navy St.

Santa Monica, CA 90405

E-mail: billfollett@adelphia.net

November 11, 2006

[E-mail date: November 11, 2006]

Comment No. 22.1

I am a 20 year + resident of Santa Monica. I live between the main Santa Monica College campus and the Bundy campus. I have paid thousands of additional real estate tax dollars for Santa Monica College improvements, and continue to pay additional tax dollars every year in support of the college. Though many of the applicants to the college do not live in Santa Monica, and the school does not really specifically benefit us directly in that way, homeowners here continue to support the school. We would not like to see our financial support used in any way that is detrimental to our lives.

Response No. 22.1

Comment noted. This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR and will be forwarded to the Decision-Makers for their consideration.

Comment No. 22.2

Living near the intersection of Airport and 23 St, I have a great deal of experience with that particular intersection. I have read that it was recently reclassified from an F safety rating to a B rating. This is preposterous. I have lived in New York City (where I was a licensed professional driving instructor for five years), San Francisco, and here in the LA area. This is one of the most dangerous intersections I have ever encountered anywhere. If the accident incident statistic there has been low, it is only because few people dare to use Airport Ave at 23 St. With the cars coming down the steep hill and around the bend in one direction, and around the same S bend and up the hill in the other direction, the very existence of Airport intersecting 23 St. there is questionable. Adding a substantial number of additional users to Airport Ave. will result in catastrophe. Any proponent for increase use of this intersection will be responsible for the inevitable carnage and the death and injury that will ultimately result. It's manslaughter in the making. Please do all possible to prevent any traffic going to and from that intersection and the school. I know that your options may be somewhat limited, but this must not be considered one of them. It's just way too dangerous. It requires great vigilance and even more patience, and then still some risk taking. Even with my professional driving background and years of experience carefully using the 23 St./Airport Ave. intersection, it is still scary to me every time. The thought of many additional drivers, many relatively young and inexperienced drivers, negotiating the complexities of turning in and out of Airport Ave. at 23 St. is truly a nightmare. PLEASE DON'T LET THIS HAPPEN. Thank you.

Response No. 22.2

The comment states an opinion that no additional traffic should travel between Airport Avenue & 23rd Street/Walgrove Avenue and the Bundy Campus. In response to the comment, it should be noted that five of the Access Alternatives analyzed in the Draft EIR (A3, A4, A7, A8 and B3) would not allow eastbound ingress from Airport Avenue and would prohibit drivers exiting the Bundy Campus to turn west directly onto Airport Avenue. These Access Alternatives would result in the least traffic added to the intersection cited in the comment. See also the responses to Comments 7.4 and 7.9. This comment does not raise any issues regarding CEQA or the adequacy of the EIR. The access scenario identified by the commenter is one of many Access Alternatives analyzed in the Draft EIR traffic analysis. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 23

From: "Eric Gabster" <outridinghorses@verizon.net>
Subject: Bundy Campus EIR
To: "LAWSON_RANDAL" <lawson_randal@smc.edu>
Date: Mon, 13 Nov 2006 15:55:04-0800

Comment No. 23.1

This email will be followed by hard copy to arrive by US mail, but the data will be in your office by the 11/13/06 cut off.

The Master Plan and EIR for the Bundy Campus revisits issues that have been discussed and analyzed now for years in assorted public meetings before the Airport Commission, the Santa Monica City Council, neighborhood groups such as The Friends of Sunset Park and the EIR's first effort at gathering public comment.

It is regrettable that the current plan once again raises dead issues that have occupied hundreds of hours of public, recorded discourse and suggests them once again as alternatives. These matters have already been settled in votes by the City Council, and should remain in their current configuration. Growing the Bundy Campus adding parking, facilities, more people and traffic only underscores the need for certain conditions to remain as they are:

Response No. 23.1

CEQA requires the study of a reasonable range of alternatives in the EIR. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

Comment No. 23.2

THERE MUST BE NO EGRESS TO THE WEST ON AIRPORT AVENUE in any alternative selected for the final plans.

Response No. 23.2

This comment does not raise any issues regarding CEQA or the adequacy of the EIR. Nonetheless, the access restriction identified by the commenter is a component of many of the Access Alternatives analyzed in the Draft EIR traffic analysis (i.e., Access Alternatives A2, A3, A4, A7, A8 and B3). This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

Comment No. 23.3

Traffic study methodologies filling enormous space in the two- thousand page EIR are highly suspect and do not include traffic generated by the current addition of Airport Park.

Response No. 23.3

The comment is incorrect in stating that traffic from Airport Park is not included in the traffic analysis. Airport Park is included as a related project in the Draft EIR (see Related Project No. 113 in Table III-1, Related Projects List, and Figure III-9, Related Projects Location Map, in the Draft EIR). Airport Park is also included as a related project in the Traffic Study (see Table 8, Trip Generation Estimates for Related Projects in the City of Santa Monica, Appendix G, Traffic Study, Volume II, Technical Appendices to the Draft EIR). Therefore, traffic associated with the Airport Park has been included in the cumulative traffic analysis, as well as the other cumulative analyses in the Draft EIR, as appropriate. As a point of clarification, the fifth page of Table III-1 in the Draft EIR, and Table 8 of Appendix G to the Draft EIR inadvertently indicate a reduction for the removal of the former SMC shuttle lot on the site of the park. In fact, no such adjustment was made in the traffic analysis for the removal of that use, as it was no longer in place when the baseline traffic data used in the Draft EIR traffic analysis was conducted. As such, corrections to Table III-1 of the Draft EIR and Table 8 to the Traffic Study have been included in Section III (Corrections and Additions to the Draft EIR) of this Final EIR. These corrections do not change the findings or conclusions in the Draft EIR.

Comment No. 23.4

PLEASE ANSWER THE FOLLOWING QUESTIONS IN THE FINAL ENVIRONMENTAL IMPACT REPORT:

Explain how the 2004 KAKU traffic study (Table 5) can show the intersection at 23rd St. and Airport Avenue to have a Level of Service "F" rating in the AM, and a "D" rating in the PM while the current draft EIR shows the same intersection to HAVE IMPROVED to a rating of "E" in the AM, and "B" in the PM -- while just a few yards to the south on 23rd/Walgrove at Rose the same traffic creates "F" ratings

AM and PM peak? Any person who drives that street will say that stretch of road has gotten worse in the last two years.

Response No. 23.4

See prior response to Comment 7.9 for clarification on this issue. As discussed there, the intersection analysis provided in the Draft EIR calculates operating conditions at each analyzed intersection separately, as is typical, rather than simulating traffic flow along a series of corridors. The effectiveness of the proposed Mitigation Measure J-2 is discussed in the responses above to Comments 5.32 and 5.41.

Comment No. 23.5

Further, please explain how the 2010 projection for the 23rd/ Airport Avenue intersection WITH MITIGATION is rated “F” -- and yet continues to be considered as an alternative egress for some part of the estimated 5317 daily car trips? This analysis makes no sense at all.

How can a proposal be offered that clearly flies in the face of reason?

Response No. 23.5

The effectiveness of the proposed Mitigation Measure J-2 is discussed in the responses above to Comments 5.32 and 5.41. As discussed, although the proposed mitigation measure would not alleviate the projected LOS F condition at this location, it would reduce the project-related impact to a less-than-significant level.

Comment No. 23.6

We currently stand against any traffic being dumped to the west, regardless of which driveway it traverses, and will continue to support the City Council and Airport Commission’s rejection of any alternative that suggests doing so.

Response No. 23.6

This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 24

From: Christine Hardin [mailto: chardin@pickettdesigns.com]

To: LAWSON_RANDAL

Cc: ZinaJosephs@aol.com

Subject: Bundy Campus Building Project Comment

Sent: Monday, November 13, 2006 6:45 AM

Comment No. 24.1

I am writing to you regarding the further expansion and development of the Santa Monica College on the Bundy Campus. My only concern is the traffic problem in the area and even after attending the recent meeting held for the community, it isn't clear to me how the problem is going to be handled. I live on the other side of the airport on Pier Avenue which is a street running parallel to Airport Avenue. Several times during the day (without this additional development) I can not make a left turn onto 23 Street even after waiting for the traffic to subside for over 10 minutes. I have to back up and pull a U-turn and go the long way around to get to the same place. If the traffic is moving almost slower than I can walk then how will more cars in the area be possible? It will be absolute grid lock! If this happens, then what difference does it make that the buildings are beautiful and that they meet a LEED rating or that the landscaping is sustainable? The quality of life for the local residents is being compromised to a degree that without a traffic solution we would be foolish to support the project. No additional cars in our neighborhood is the goal. How can we achieve this goal? If you don't live in the immediate vicinity then you don't know the extent of the challenge. The EIR does not adequately address this issue and it is the one major issue that the community is concerned about. The neighborhood is PRO higher education but not without a solution to the immobilizing traffic on the surrounding streets. Please do what you can to address this problem and I am confident that the community will happily support your current and future plans for the school.

Response No. 24.1

Mitigation measures are proposed in Section IV.J (Transportation and Traffic) of the Draft EIR to mitigate identified significant traffic impact where feasible. Overall, the College is confident that it has exhibited a "good faith effort at full disclosure" in both the preparation of the traffic analysis as well as the remainder of the Draft EIR. See also the response to Comment 22.2. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 25

From: Becky Harshberger [mailto: BHarshberger@EntertainmentPartners.com]

To: LAWSON_RANDAL

Cc: ZinaJosephs@aol.com

Subject: keep the campus access to Airport Ave. to its current “exit-only, right-turn-only” status,

Sent: Thursday, November 09, 2006 12:02 PM

Comment No. 25.1

I live near Ocean Park and am frustrated by the increasing amount of traffic caused by spread of SMC. Opening Airport Ave is not appropriate given this would bring about 1,000 additional car trips into the Airport/Walgrove/23rd intersection, bringing that intersection up to 25,000 cars per day, 10,000 more than recommended by Santa Monica’s own Traffic Management department.

I took a class at SMC this summer (at the Pico campus), I walked. The instructor tried to let the class out early every night so they could beat the traffic out of the parking structure. I heard numerous complaints from students about it taking over 30 minutes to get out of the parking structure and another 30 to get to the freeway.

Cars sitting in long lines are adding to the air pollution. Pico, Ocean Park and Pearl air quality at certain times are thick with exhaust. Children live here, they walk to school. Opening Airport Ave is NOT the answer to these issues.

I am aware that there may be strong pressure from residents in Mar Vista to allow “full access” to Airport Ave., while keeping the Stewart St. gate to the SW corner of the Bundy Campus closed. The college has agreed to keep the Stewart gate closed, to protect that neighborhood, but is again advocating for more college traffic on Airport Ave.

Please keep the campus access to Airport Ave. to its current “exit-only, right-turn-only” status.

Response No. 25.1

This comment does not raise any issues regarding CEQA or the adequacy of the EIR. The preferred access scenario identified by the commenter is one of many Access Alternatives analyzed in the Draft EIR traffic analysis. It should be noted that under no study scenario does the Proposed Project generate 1,000 daily car trips traveling through the intersection of Airport Avenue and 23rd Street/Walgrove Avenue (refer to Section IV.J (Transportation and Traffic) of the Draft EIR, and the response to Comment No. 7.8 previously provided). This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 26

Glenn Howell
12607 Rose Ave.
Los Angeles, CA 90066
Subject: SMC Bundy Campus DEIR
November 10, 2006

Comment No. 26.1

The Transportation and Traffic portion of the environmental analysis is seriously flawed. The most significant environmental impact of the SMC Bundy Campus Master Plan is traffic. The traffic impact of this project is unacceptable without mitigation.

The most glaring error in the Kaku study is the failure to include traffic from Santa Monica Airport Park in the analysis. Kaku did the traffic study for Airport Park, so there is no excuse for their ignoring the traffic this park will generate. This is a known project that must be considered in the Bundy Campus EIR. The traffic estimate in the Airport Park EIR was:

city park --- 205 trips per day

dog park --- 225 trips per day

soccer fields --- 198 trips per day

The total traffic generated by Airport Park is therefore, 628 car trips per day.

Without considering the impact of either the Bundy Campus or Airport Park, Bundy Drive has a Level of Service rating of "F" based on measuring actual traffic flow for both intersections and street segments. The "F" rating for Bundy and Centinela intersections means that the backups on cross streets may restrict, or prevent movement of vehicles out of the intersection approaches, and tremendous delays with continuously increasing queue lengths. It means that the ratio of actual traffic volume to street capacity greater than 1.

Response No. 26.1

The comment is incorrect in stating that traffic from Airport Park is not included in the traffic analysis. Airport Park is included as a related project in the Draft EIR (see Related Project No. 113 in Table III-1, Related Projects List, and Figure III-9, Related Projects Location Map, in the Draft EIR). Airport Park is also included as a related project in the Traffic Study (see Table 8, Trip Generation Estimates for Related Projects in the City of Santa Monica, Appendix G, Traffic Study, Volume II, Technical Appendices to the Draft EIR). Therefore, traffic associated with the Airport Park has been included in the cumulative traffic analysis, as well as the other cumulative analyses in the Draft EIR, as appropriate. As a point of clarification, the fifth page of Table III-1 in the Draft EIR, and Table 8 of Appendix G to the Draft EIR inadvertently indicate a reduction for the removal of the former SMC shuttle lot on the site of the park. In

fact, no such adjustment was made in the traffic analysis for the removal of that use, as it was no longer in place when the baseline traffic data used in the Draft EIR traffic analysis was conducted. The relocation of the former SMC shuttle lot is part of the baseline traffic conditions. As such, corrections to Table III-1 of the Draft EIR and Table 8 to the Traffic Study have been included in Section III (Corrections and Additions to the Draft EIR) of this Final EIR. These corrections do not change the findings or conclusions in the Draft EIR.

Comment No. 26.2

The Bundy Campus EIR shows that 12 of 20 intersections in Los Angeles are currently operating at a LOS of “E” or “F” during one or both peak hours.

Although the EIR says that no mitigations are possible, a simple intersection mitigation would be to prevent right turns at Airport Ave and Bundy Drive., when the light at Airport is red. When traffic is stopped at Airport, the acceleration lane on Bundy becomes a deceleration lane for traffic entering the campus driveway. Without preventing right turns on a red light this lane becomes simultaneously an acceleration lane for traffic turning onto Bundy, and deceleration lane for cars entering the campus driveway, an unacceptable situation.

Response No. 26.2

The comment notes that there is a potential for conflict between eastbound right turns from Airport Avenue and southbound right turns into the Bundy Campus. The south leg of this intersection currently provides two southbound departure lanes and the curb lane narrows approximately 100 feet south of the intersection. The proposed Mitigation Measure J-3 would widen the curb lane to provide a separate right-turn lane approaching the entrance to the Bundy Campus, providing storage for decelerating vehicles as they approach that driveway. In the event that vehicles were present there, drivers turning right from Airport Avenue onto southbound Bundy Drive would enter the southbound through lanes immediately rather than accelerating in the right-turn lane. Because there will be no access control on the inbound driveway and it will provide a long throat from Bundy Drive, queues back onto Bundy Drive from within the campus are not anticipated.

Comment No. 26.3

There is no consideration in the study on the impact of queue lines on northbound Bundy traffic waiting to turn left into the driveway blocking Stanwood Drive. This is the primary reason for considering relocating the driveway to the north.

Response No. 26.3

The commenter’s concern has been addressed in the Bundy Campus Master Plan and Draft EIR. The Bundy Campus Master Plan includes the relocation of vehicular ingress to a new driveway to Bundy Drive to be constructed on the north side of the site (the Northeast Bundy Driveway), in response to

concerns expressed by LADOT regarding the potential for northbound left-turn queues to interfere with the operation of the adjacent intersection of Bundy Drive and Stanwood Drive.

Comment No. 26.4

The concept of exiting Bundy on a steep northern driveway with a sharp right turn at the bottom is ignoring safety issues. This internal driveway would drop 11 feet in a distance of 50 feet, with a sharp left turn at the bottom. This road into the campus is called the "Interim Phase" in the EIR. As this interim phase appears to be unacceptable, why not eliminate it?

Response 26.4

The Interim Phase is an option that will be determined by available funding and is intended to reduce air quality, noise, and other nuisances identified by neighbors to the south of the Bundy Campus associated with the current location of the Bundy Driveway. The Final Phase roadway requires the demolition of the existing two-story East Building. It should be noted that the Interim and Final Phase Master Plan drawings provided in the Bundy Campus Master Plan dated September 2006 are conceptual and are intended to provide an overall feel of the appearance of the Bundy Campus at interim and final Master Plan buildout. The plans prepared for the proposed traffic signal on Bundy Drive at the proposed northern driveway show that the new driveway would have a slope of approximately 4.5% on the outside of the curve (closer to the four-story West Building) and approximately 7% at the steepest point on the inside of the curve (closer to Bundy Drive). The change in grade from Bundy Drive to the area near the east entrance to the four-story West Building would be approximately seven feet over a distance of approximately 160 feet, for an average slope of less than 5%. These slopes are well within standard driveway design practice. This comment does not require any corrections or additions to the Draft EIR.

Comment No. 26.5

Wherever the driveway enters Bundy/Centinela, the problem of merging is the same.

During heavy traffic hours the exiting cars add to the existing gridlock. During light traffic hours cars must merge with traffic moving at up to 60 miles per hour. A mitigation possibility is to prevent U-turns for the cars leaving the campus going south out of a right turn only driveway that really want to go north. A No U-turn sign at Rose would mitigate this traffic hazard. Also there should be no U-turn allowed at Stanwood Drive, and an adequate barrier on Bundy is needed to prevent illegal left turns out of the driveway. The current traffic flow at the Bundy driveway is totally unsafe.

Response No. 26.5

The Draft EIR analyzed a range of Access Alternatives for the Bundy Campus. Under the options with a full signal on Bundy Drive (i.e., Access Alternatives A1 through A5, B1, C1, and C2), drivers exiting the site would be able to turn left directly onto Bundy Drive. Under the options that would allow right-turn out only onto Bundy Drive, vehicles seeking to travel north on Bundy Drive would be able to exit via Airport Avenue and then turn left onto Bundy Drive at the existing signal. Either of these options would

minimize the potential for U-turns on Bundy Drive, as more convenient access would be available. This comment does not require any corrections or additions to the Draft EIR.

Comment No. 26.6

Of the alternatives suggested for campus access, Alternative C1 should be given serious consideration. This would eliminate the safety concerns associated with traffic using the driveway to get to Bundy. Of course from a safety standpoint, the best alternative is C2. Alternatives C1 and C2 require no additional traffic signal on Bundy.

Response No. 26.6

The study of Alternatives C1 and C2 provide public policymakers the analysis upon which to base their decisions. The combined roadway is a project that is not within the jurisdiction of the Santa Monica College Community College District and is not a project currently being considered by the City of Santa Monica. Under future conditions, Alternatives C1 and C2 may be possible, and the Bundy Campus Master Plan provides for these future opportunities.

Comment No. 26.7

The traffic study ignores the fact that when BAE was in the facility there were two gates from the parking lot to Airport Ave., and there was no driveway from the parking lot to Bundy.

Response No. 26.7

The comment is incorrect in stating that under BAE Systems ownership and operation of the site there was no Bundy Driveway. Aerial photographs from as early as 1965 through 2005 are provided in Appendix L to the Bundy Campus Master Plan and distinctly show the existence of a parking lot east of the existing two-story East Building that was accessible from Bundy Drive.

The baseline for the Draft EIR is Fall 2005, with the existing campus in operation. The analysis includes the use of the historical driveways to Airport Avenue, the alternative use of an access route to Airport Avenue at Donald Douglas Loop South, the use of the existing driveway to Bundy Drive, and a possible new northeast driveway to Bundy Drive, but does not include use of Stewart Avenue, which was also used by BAE Systems.

Comment No. 26.8

Table IV.J-14 Master Plan Trip Generation Estimations makes no sense. According to this table the number of cars entering the campus is greatest during the evening peak traffic hours. It shows that more cars enter the campus in the evening than in the morning. This is supposedly based on actual data. Where is the data? Is it possible that the “in” and “out” data is reversed? The data shows that 2.4 times as many cars are going into the campus during the PM Peak Hour than are leaving.

Response No. 26.8

This table is based on actual counts in September 2005 and February/March 2006. The 24-hour counts for September 2005 are in Appendix B of Appendix G to the Draft EIR, Volume II, pages 191-193. The 24-hour counts and turning counts for February/March 2006 are on pages 216 through 227. The reason for this is that cars entering in the p.m. peak hour are focused arrivals just before evening classes start, whereas cars leaving from daytime classes are spread out throughout the afternoon.

Comment No. 26.9

The conclusion in the EIR that the Master Plan will reduce traffic by 34% compared with the previous BAE use is totally flawed. There is no way that the Bundy Campus, as described in the Master Plan, will reduce traffic on Bundy.

Response No. 26.9

The Bundy Campus Master Plan will not reduce traffic. However, for informational purposes, compared to the prior uses, including BAE Systems and the College Shuttle Program, the a.m. peak hour traffic generated by the Bundy Campus at buildout (30 classrooms) is about two-thirds of the former uses and about 109% of the former uses in the p.m. peak hours.

Comment No. 26.10

Subtracting the traffic associated with shuttle parking on the north side of Airport Ave. is totally wrong. Shuttle parking and Bundy Campus parking moved across the street. It didn't disappear.

Response No. 26.10

The College Shuttle Program ceased operating from the Santa Monica Airport in August 2005. Since that time, the College Shuttle Program has operated at the Santa Monica Beach. Additionally, the College has purchased a permanent replacement property for future use for the Shuttle Program. The methodology used to develop trip generation estimates for the Proposed Project is further described in the response to the Comment No. 5.49. As discussed there, no reduction was made for the former shuttle lot that operated near the Project Site.

Comment No. 26.11

Table IV.J-16, item 15 is curious. Isn't all of Airport Ave. west of Centinela. On page IV.J-41, the first sentence says; "The segment of Airport Avenue east of Centinela Avenue--" Where is there a segment of Airport Ave. east of Centinela? There is an Airport Ave. east of Centinela, but it's in Inglewood.

Response No. 26.11

The commenter is correct in pointing out an inadvertent error on page IV.J-41 of the Draft EIR. This inadvertent error is also present on page 27 of Appendix G to the Draft EIR but does not affect the

analysis or conclusions in the EIR. These errors are corrected in Section III (Corrections and Additions to the Draft EIR) of the Final EIR.

Figure IV.J-1 provides a visual diagram of the location of the Study Intersections and Street Segments. The diagram shows where traffic was counted. Traffic on Airport Avenue was counted in two places, one near the Centinela Avenue intersection and the other near the Walgrove Avenue intersection. The eastern segment has been named “Airport Avenue west of Centinela Avenue” and the western segment has been named “Airport Avenue east of 23rd Street/Walgrove Avenue.” Thus, the description of the analyzed segments of Airport Avenue in Table IV.J-16 is appropriate.

Comment No. 26.12

The EIR suggest moving the bus stop to the north. This would require that students using the Big Blue Bus to walk across Airport Avenue. What is to be gained by moving the bus stop north of Airport Avenue? Have the obvious trade-offs been evaluated?

Response No. 26.12

The bus stop is proposed to move north of its existing location but remain south of Airport Avenue.

Comment No. 26.13

On page IV.J-41 there is a discussion of the intersection of Venice Boulevard and Centinela Avenue which states; “Therefore, based on the CMP guidelines described previously in this Section, further CMP analysis is required at this intersection”. Is this going to be done before the EIR is approved?

Response No. 26.13

The Los Angeles County Metropolitan Transportation Authority’s (LACMTA) Congestion Management Program (CMP) for Los Angeles County requires that traffic impact analyses be conducted for CMP arterial monitoring intersections where a Proposed Project will add 50 or more trips during either the a.m. or the p.m. weekday peak hours of adjacent street traffic.

The Bundy Campus Master Plan adds up to 78 vehicles in either the weekday a.m. or p.m. peak hour to the intersection of Venice Boulevard and Centinela Avenue and further analysis for this intersection is provided using Critical Movement Analysis (CMA) methodology in Appendix G to the Draft EIR, Volume II. That analysis concludes that there would not be a significant CMP impact at this intersection.

Comment No. 26.14

Page IV.J-45, talks about impacts associated with the Master Plan combined with cumulative development in Los Angeles and Santa Monica. Why isn’t Airport Park considered as an associated City of Santa Monica development?

Response No. 26.14

As noted previously, Airport Park is included as a related project in the Draft EIR and Traffic Study. Refer to the response to Comment No. 26.1 for additional explanation.

Comment No. 26.15

Under “Mitigation Measures at Intersections”, the EIR states that “The traffic study determined that the Master Plan would result in significant traffic impact”. It goes on to say that mitigation measures were developed “where feasible”, and finally concludes that “the Master Plan impact would remain significant and unavoidable under all access alternatives”.

How will this disturbing fact be handled in evaluating the EIR and the project? Approving this EIR as written will be most upsetting to people in both Los Angeles and Santa Monica.

Response No. 26.15

In the event that environmental impacts are significant and unavoidable for a project under the California Environmental Quality Act, the Board of Trustees may adopt a Statement of Overriding Considerations. This statement is a determination by the Board that the educational, social, cultural, economic, or other benefits of the project outweigh the unavoidable adverse environmental impacts. The Bundy Campus Master Plan project objectives are provided on pages II-16 and II-17 of the Draft EIR.

Comment No. 26.16

Page IV.J-47 talks about speed bumps as calming measures that are “typical on neighborhood streets such as Rose Avenue east of Bundy”. There are no speed bumps on Rose Ave. in the vicinity of the SMC Bundy Campus. It appears that KAKU people have not seen Rose Ave. How can we believe their traffic study? Rose Ave. does continue east of Bundy on a driveway to Little League fields and a community garden. Has traffic to and from North Venice Little League and Ocean View Farms been considered in the traffic study? Saying that there are existing speed bumps on Rose Ave. is a good example of the misinformation in the traffic analysis.

Response No. 26.16

The paragraph refers to “typical” calming measures, such as stop signs and speed humps. There are many stop signs on Rose Avenue between Centinela Avenue and Walgrove Avenue, which serve to deter traffic from Rose Avenue and reroute it to Palms Boulevard or to Airport Avenue. There are also speed humps on 23rd Street from Ocean Park Boulevard north to Pico Boulevard. The paragraph refers to both and is correct as written.

As stated in the response to Comment 26.11, Section III (Corrections and Additions to the Draft EIR) of the Final EIR will reflect the correction noted by the commenter with regard to the phrase “Rose Avenue east of Bundy Drive” on page IV.J-41 of the Draft EIR and page 27 of the Traffic Study (Appendix G to

the Draft EIR) which should read “Rose Avenue west of Bundy Drive.” This correction will not change any findings or conclusions contained within the Draft EIR.

Comment No. 26.17

As SMC has not done a good job of informing the Bundy Campus neighbors about the serious impact on our neighborhood I feel compelled to inform them of this flawed EIR and its poorly done traffic section. Surely Kaku could have done a better job. The blatant error of excluding Airport Park is unforgivable.

Approval of this EIR by SMC Board of Trustees without going back to the drawing board would be unthinkable. In order to provide a correct traffic analysis, SMC might consider hiring different traffic consultant.

Response No. 26.17

As noted above, Airport Park is included as a related project in the Draft EIR and Traffic Study. Refer to the response to Comment No. 26.1 for additional explanation. The College is confident that it has exhibited a “good faith effort at full disclosure” in both the preparation of the traffic analysis as well as the remainder of the Draft EIR. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 27

From: [Glen Howell] “Nancy and Glen Howell” nghowell@verizon.net

Subject: Comments on Bundy Campus EIR

To: “LAWSON_RANDAL” lawson_randal@smc.edu

Date: Mon, 13 Nov 2006 12:47:46 -0800

Comment No. 27.1

I have submitted my detailed comments on the Bundy Campus EIR in a letter. I thought it might be useful to send something less detailed to summarize and prioritize my thoughts on the EIR. My primary issue with the EIR is traffic, and its mitigation. My main problem with the EIR is failure to provide mitigation for serious traffic impacts on the neighborhood.

Response No. 27.1

Section IV.J (Transportation and Traffic) of the Draft EIR provides a detailed explanation of the Proposed Project’s potential traffic impacts. Section IV.J recommends several mitigation measures to reduce the Proposed Project’s potential traffic impacts. Mitigation Measures J-1 through J-6 are presented on pages IV.J-46 through IV.J-49 of the Draft EIR. This comment does not require any corrections or additions to the Draft EIR. This comment is noted and will be forwarded to the Decision-Makers for their consideration.

Comment No. 27.2

I fault the SMC for continuing to compare the traffic impact of the Bundy Campus with the prior BAE usage. BAE's primary parking lot access was Airport Avenue. There was no Bundy Driveway, hence no access from the parking lot to Bundy Ave. The traffic impact of the Bundy Campus at full planned build out is unacceptable.

Response No. 27.2

The comment is incorrect in stating that under BAE Systems ownership and operation of the site there was no Bundy Driveway. As described in the response to Comment No. 26.7, aerial photographs from as early as 1965 through 2005 are provided in Appendix L to the Bundy Campus Master Plan and distinctly show the existence of a parking lot east of the existing two-story East Building that was accessible from Bundy Drive.

Nonetheless, it should be clarified that the Draft EIR traffic analysis does not include BAE traffic within the baseline counts. As stated on page IV.J-29 of the Draft EIR, the comparison of the Master Plan traffic to the former traffic associated with BAE Systems operations and the SMC Shuttle Lot was "for information purposes only" and did not affect the Draft EIR traffic analysis. This comment does not raise any issues regarding CEQA or the adequacy of the EIR and will be forwarded to the Decision-Makers for their consideration.

Comment No. 27.3

SMC failed to coordinate their planning with LADOT. LADOT has clearly stated their position relative to adding a full traffic signal on Bundy. They will not allow it. Yet the EIR ignores the well documented position of LADOT by including 6 traffic options with full traffic signals on Bundy. The reason for LADOT's position is simple. The impact of having three full traffic signals in a distance of less than 1000 feet would compound the current gridlock during the morning and evening heavy traffic hours. Typically traffic signals are placed no closer than 1000 ft. apart.

Response No. 27.3

As described in the response to Comment No. 6.11, the design of the new traffic signal on Bundy Drive is being reviewed by and is subject to the final approval of LADOT. Refer to Comment Letter No. 6 received from LADOT on the Draft EIR, for additional information.

Comment No. 27.4

The Bundy Campus EIR, which provides no traffic mitigations and does not comply with LADOT traffic requirements, is unacceptable.

Response No. 27.4

The Draft EIR provides an analysis of a total of 16 access scenarios to and from the Bundy Campus, which are described in detail in Section IV.J (Transportation and Traffic) of the Draft EIR (see pages IV.J-20 through IV.J-22). Mitigation Measures J-1 through J-6 are presented on pages IV.J-46 through IV.J-49 of the Draft EIR (see also response to Comment No. 27.1). The Traffic Study and the Draft EIR traffic analysis analyzed those study street segments and intersections recommended by the City of Santa Monica and LADOT and used the methodology recommended by each City for the street segments and intersections within their respective jurisdictions. Refer to pages IV.J-6, IV.J-16, IV.J-17, and IV.J-18 of the Draft EIR for additional explanation of the use of LADOT methodology in the Draft EIR traffic analysis.

COMMENT LETTER No. 28

From: [Nancy Howell] "Nancy and Glen Howell" nghowell@verizon.net

Subject: EIR draft

To: "LAWSON_RANDAL" Lawson_randal@smc.edu

Date: Mon, 13 Nov 2006 15:46:53 -0800

Comment No. 28.1

[I] am a resident of Mar Vista and attended the DEIR meeting. I want to voice my serious objection to this document. More study is needed. Much of the Kaku report is flawed.

1. Perhaps one of the most glaring flaws is the omission of the increased number of cars projected by the addition of the Santa Monica Airport Park. This omission is inexcusable since Kaku prepared this report. Since the entrance and exit of this park solely rests on Airport Ave. and Bundy/Centinela and Airport and 23rd/Walgrove this most certainly should have been included in the Santa Monica Bundy Campus EIR.

Response No. 28.1

The comment is incorrect in stating that traffic from Airport Park is not included in the traffic analysis. Airport Park is included as a related project in the Draft EIR (see Related Project No. 113 in Table III-1, Related Projects List, and Figure III-9, Related Projects Location Map, in the Draft EIR). Airport Park is also included in Table 8, Trip Generation Estimates for Related Projects in the City of Santa Monica, Appendix G, Traffic Study, Volume II, Technical Appendices to the Draft EIR. Therefore, traffic associated with the Airport Park has been included in the cumulative traffic analysis, as well as the other cumulative analyses in the Draft EIR, as appropriate. As a point of clarification, the fifth page of Table III-1 in the Draft EIR, and Table 8 of Appendix G to the Draft EIR inadvertently indicated a reduction for the removal of the former SMC shuttle lot on the site of the park. In fact, no such adjustment was made in the traffic analysis for the removal of that use, as it was no longer in place when the baseline traffic data used in the Draft EIR traffic analysis was conducted. As such, corrections to Table III-1 of the Draft

EIR and Table 8 to the Traffic Study have been included in Section III (Corrections and Additions to the Draft EIR) of this Final EIR. These corrections do not change the findings or conclusions in the Draft EIR.

Comment No. 28.2

2. Only the origin and final destination was considered In determining the number of cars entering and leaving the Bundy campus. In reality, due to the numerous addition of classes, students will need to enter and exit the campus more than one time. Originally the Mar Vista stake holders were told that this would be a self contained campus with only a School of Nursing and an Early childhood education program. This has changed immensely with numerous classes being offered. The increase of traffic has not been addressed. Also the total number of cars for both buildings should be addressed.

Response No. 28.2

The trip generation estimate for the Bundy Campus Master Plan at buildout (30 classrooms) is based on actual counts conducted in Spring 2006 and fully reflects the types of programs that are currently offered and in planning for the site. Section IV.J (Transportation and Traffic) of the Draft EIR provides a detailed explanation of the Proposed Project's potential traffic impacts. Section IV.J recommends several mitigation measures to reduce the Proposed Project's potential traffic impacts. Mitigation Measures J-1 through J-6 are presented on pages IV.J-46 through IV.J-49 of the Draft EIR. This comment does not require any corrections or additions to the Draft EIR.

Comment No. 28.3

3. Certain statements in the Kaku document are completely inaccurate which makes the credibility of the entire report questionable. For example: on Page IV, J-47; Rose Avenue east of Centinela does not have speed bumps. This is a driveway entrance to North Venice Little League and Ocean View Farms. In fact there are no speed bumps on Rose Ave west of Centinela.

There are some serious concerns relating to traffic in the EIR with no mitigation.

Response No. 28.3

The paragraph refers to "typical" calming measures, such as stop signs and speed humps. There are many stops signs on Rose Avenue between Centinela Avenue and Walgrove Avenue, which serve to deter traffic from Rose Avenue and reroute it to Palms Boulevard or to Airport Avenue. There are also speed humps on 23rd Street from Ocean Park Boulevard north to Pico Boulevard. The paragraph refers to both and is correct as written. As stated in the response to Comment 28.2, above, pages IV.J-46 through IV.J-49 in Section IV.J of the Draft EIR provide several mitigation measures to reduce the Proposed Project's potential traffic impacts, where feasible. Section III (Corrections and Additions to the Draft EIR) of the Final EIR will reflect the correction noted by the commenter with regard to the phrase "Rose Avenue east of Bundy Drive" on page IV.J-41 of the Draft EIR and page 27 of the Traffic Study (Appendix G to the

Draft EIR) which should read “Rose Avenue west of Bundy Drive.” This correction will not change any findings or conclusions contained within the Draft EIR.

Comment No. 28.4

1. There is a mention of a possible driveway to be built at the north side of the campus at Bundy. On page IV J-19, there is a description of what I understood to be an interim driveway. There is no description of the permanent driveway in the EIR although it is indicated in a diagram. I cannot see any possibility that the interim driveway could be approved by the City of Los Angeles on the basis of safety. There would be a sharp right turn by those going south on Bundy in order to enter the campus. Within 15 feet there is a drop of 11 feet and then another sharp left turn. Within a few more feet there is a sharp right turn in order to join the present south driveway. This appears extremely unsafe to me. No 1/2 signal should be installed until the West building is at least partially demolished so that a safe straight entrance can be constructed.

Response No. 28.4

The commenter has correctly identified the description of the Interim Phase on page IV.J-19 of the Draft EIR (see also Appendix H of the Bundy Campus Master Plan dated September 2006 for a conceptual drawing). As described in the response to Comment No. 26.4, the Interim Phase is an option that will be determined by available funding and is intended to reduce air quality, noise, and other nuisances identified by neighbors to the south of the Bundy Campus associated with the current location of the Bundy Driveway. However, the statement in the comment that the existing West Building will be demolished is incorrect. The Final Phase roadway under the Bundy Campus Master Plan requires the demolition of the existing two-story East Building, but not the four-story West Building. The Final Phase Master Plan drawing is provided as Figure II-3, Proposed Site Plan in Section II (Project Description) of the Draft EIR as well as in Appendix J-1 to the Bundy Campus Master Plan dated September 2006. It should be noted that these drawings are intended to provide the overall feel of the appearance of the Bundy Campus at interim and final Master Plan buildout. Complete, close-up drawings for both phases are currently in the process of being finalized by the College. See also the response to Comment 26.4. This comment does not require any corrections or additions to the Draft EIR.

Comment No. 28.5

2. The exit from the south driveway is also a severe hazard. There is a sign which indicates right turn only which is rarely observed. Those that do turn right frequently do one of three things. Make a U- turn at Stanwood Drive, make a dangerous and illegal U- turn in the middle of Centinela, or else go to Rose Avenue and wait in the left hand turn lane in order to make a U- turn in the driveway which is the entrance to the Little League and garden. I personally would like to see the South driveway closed. Those students wishing to obey the law and return to main campus will go down Rose Avenue and through our neighborhood and ultimately get to 23rd Street and go through Sunset park. The no left turn on Airport Avenue does not protect Sunset Park residents from additional traffic. It only causes cars to first go through residential Mar Vista before ending up on 23rd Street. If the south driveway stays in operation, there must be some type of barrier in the center of the highway between the Bundy South

driveway and Rose avenue to prohibit any attempt of a U-turn. There also must be a sign at Stanwood Drive and at Rose Avenue stating no U-turn.

Response No. 28.5

The Draft EIR provides an analysis of a total of 16 access scenarios to and from the Bundy Campus, which are described in detail in Section IV.J (Transportation and Traffic) of the Draft EIR (see pages IV.J-20 through IV.J-22). As described in response to Comment 26.4, under the options with a full signal on Bundy Drive (i.e., Access Alternatives A1 through A5, B1, C1, and C2), drivers exiting the site would be able to turn left directly onto Bundy Drive. Under the options allow right-turn out only onto Bundy Drive, similar to existing conditions, vehicles seeking to travel north on Bundy Drive would be able to exit via Airport Avenue and then turn left onto Bundy Drive at the existing signal. Either of these options would minimize the potential for U-turns on Bundy Drive, as more convenient access would be available. This comment does not require any corrections or additions to the Draft EIR.

Comment No. 28.6

There is absolutely inadequate mitigation for the traffic, noise, and pollution which the community of Mar Vista will endure.

Response No. 28.6

The College is confident that it has exhibited a “good faith effort at full disclosure” in both the preparation of the Project Description as well as the remainder of the Draft EIR. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

Comment No. 28.7

Most importantly, LADOT should have been involved in the preparation of this report. The Bundy campus seriously affects the City of Los Angeles and for this EIR to be drafted without the approval of LADOT is disturbing.

I am hoping you will reconsider and begin this process again and include input from Los Angeles.

Response No. 28.7

Responses to the comment letter received from LADOT are provided above (see Comment Letter No. 6). The scope of the traffic analysis prepared for the Draft EIR was discussed with staff of both the Cities of Los Angeles and Santa Monica at the outset of the study. Extensive input was received and incorporated regarding the locations that should be evaluated for potential project impacts. Also, as discussed above, the design of the new traffic signal on Bundy Drive is being reviewed and is subject to the final approval of LADOT.

COMMENT LETTER No. 29

Otis L. Hubbard

12547 Rose Avenue

Los Angeles, California 90066

E-mail: Otish13144@aol.com

Re: Santa Monica College Bundy Campus Master Plan and Draft Environmental Impact Report
(hereinafter, "Master Plan")

November 13, 2006

Comment No. 29.1

Introduction

The draft Master Plan provides insufficient mitigating measures as follows:

A. If it is assumed that the plan is to be implemented as set forth, it provides insufficient mitigating measures including, but not limited to, those measures specifically addressed below.

Response No. 29.1

The College is confident that it has exhibited a "good faith effort at full disclosure" in both the preparation of the Project Description as well as the remainder of the Draft EIR. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

Comment No. 29.2

B. The draft plan sets forth several alternative uses for the SMC Bundy Campus, rejecting all but the one proposed in the Master Plan. The "no project alternative" is dealt with in a seriously flawed manner. It assumes that the property would be sold and converted to commercial or other purposes that would cause a more significant environmental impact than the proposed Master Plan. This is nonsense.

Response No. 29.2

Pursuant to CEQA, Section VI (Alternatives to the Master Plan) of the Draft EIR involves a comparison of a reasonable range of Project Alternatives, including several No Project Alternative scenarios. As is summarized on page VI-3 of the Draft EIR, these scenarios include a No Project Alternative in which the Master Plan would not be adopted and implemented and the campus would remain as is, a No Project Alternative in which the Master Plan would not be adopted and implemented and campus would be developed with a commercial complex, and a No Project Alternative in which the Master Plan would not be adopted and implemented and campus would be developed with a multi-family residential complex. As stated on page VI-7 of the Draft EIR, the two latter scenarios are specifically identified in the Appraisal Report prepared by Buss-Shelger Associates for the Bundy Campus site on November 30, 2001. The Appraisal Report identified the "highest and best use" of the site to be the development of 494,100 square feet (sf) of commercial office development and 2,000 parking spaces. The Appraisal

Report also identified several prospective buyers, including one buyer who proposed approximately 625 multi-family residences on the site. The Appraisal Report is available for review at Santa Monica College's Facilities Planning Office at 2121 16th Street, Santa Monica, California 90405, during normal business hours. =.

Pursuant to Section 15126.6 of the State CEQA Guidelines, the analysis also identifies the "environmentally superior alternative," (i.e., the alternative that would result in the fewest environmental impacts), which is identified as the Renovated East Building Alternative. As stated on page VI-52, "[w]hile the Renovated East Building Alternative would reduce some of the significant impacts of the Master Plan, the Renovated East Building Alternative would not reduce all of the Master Plan's significant impacts, and would increase impacts in some of the analyzed environmental issue areas. Furthermore, the Renovated East Building Alternative would not fully satisfy several of the Master Plan's objectives."

This comment does not require any changes or additions to the Draft EIR.

Comment No. 29.3

As to B, immediately preceding, if the Master Plan is not implemented, there is no reason why the Bundy campus cannot continue to operate, but with limitations on usage of the property which will not impact the surrounding neighborhoods, traffic flows, and the general environment. *This* is a viable alternative. The Master Plan assumes that some more invasive usage would necessarily occur. That is not the case.

Response No. 29.3

As stated in the response to Comment No. 29.2, above, the Section VI (Alternatives to the Master Plan) of the Draft EIR includes an analysis of a No Project Alternative in which the Master Plan would not be adopted and implemented and the campus would remain as is (see pages VI-3 and VI-6 through VI-15). As required by Section 15126.6(e)(2) of the State CEQA Guidelines, if the No Project Alternative would result in the fewest environmental impacts, the analysis must identify another alternative as the "environmentally superior alternative" (i.e., in this case, the Renovated East Building Alternative). This comment does not require any changes or additions to the Draft EIR.

Comment No. 29.4

Your attention is invited to Section 15126 of the California Environmental Quality Act (hereinafter "Ceqa"), wherein it mandates several aspects of the environmental impact of a project be considered. It mandates a table is to be prepared and each alternative to be discussed, including,

(b) Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented.

(c) Significant Irreversible Environmental Changes Which Would be Involved in the Proposed Project Should it be Implemented.

(d) Growth-Inducing Impact of the Proposed Project.

(e) The Mitigation Measures Proposed to Minimize the Significant Effects.

Response No. 29.4

Comment noted. Items (b), (c), and (d) identified in Comment No 29.4, above, are provided in Section V (General Impact Categories) of the Draft EIR. Item (e) identified in Comment No. 29.4 is provided in Table I-1 in Section I (Introduction) of the Draft EIR. It should be clarified that Section 15126 of the State CEQA Guidelines does not mandate that a table be prepared discussing each of the Items (a) through (e) above, but states that each such item shall be discussed “preferably in separate sections or paragraphs of an EIR.” Section 15126.6 does state that a “matrix [...] may be used to summarize the comparison [of alternatives].” Refer to Table VI-1 on pages VI-53 through VI-54 of Section VI (Alternatives to the Master Plan) of the Draft EIR for a comparative matrix of the Master Plan and the project alternatives. This comment does not require any changes or additions to the Draft EIR.

Comment No. 29.5

The Master Plan, on its face, displays significant impacts which are concededly beyond mitigation. See Master Plan, IV J, pp. 45-49.

Response No. 29.5

The Draft EIR acknowledges that the Master Plan would result in significant and unavoidable impacts. As is stated on page V-1 in Section V of the Draft EIR, “the Master Plan would result in impacts ranging from less than significant to significant and unavoidable, with significant and unavoidable impacts occurring for Noise (Construction) and Transportation and Traffic (Intersections and Street Segments).” This comment does not require any changes or additions to the Draft EIR.

Comment No. 29.6

Please note: Those who prepared the Master Plan assume that the Master Plan must be implemented, hence the phraseology “significant and unavoidable.”

This is a patent error. One of the alternatives that is always available is simply to discard the Master Plan, abandon the project, or devise a use for the property that does not result in “significant” impacts on the environment.

A more reasonable terminology for impacts of the plan which result in significant impacts would be “significant and unacceptable.”

Response No. 29.6

As is stated in Comment No. 29.3, CEQA requires the discussion of “Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented.” This terminology is widely accepted

among CEQA practitioners to mean that those significant environmental effects which would occur and cannot be mitigated to a level of insignificance in the case that a proposed project is implemented. This comment does not require any changes or additions to the Draft EIR.

Comment No. 29.7

It is also disingenuous to argue that alternative uses of the property would necessarily result in even more significant impacts on the neighborhoods, e.g., VI pp. 6-7.

Response No. 29.7

As shown in Table VI-1 on pages VI-53 through VI-54 of Section VI (Alternatives to the Master Plan), some of the environmental impacts associated with the Master Plan would be reduced under each of the Project Alternatives analyzed, while other environmental impacts would be increased. This comment does not require any changes or additions to the Draft EIR.

Comment No. 29.8

It is specious to suggest an alternative of commercial use that would result in 2000 parking spaces, significant increase of usable square footage, etc. There is no reason whatever to assume that such a use would pass muster in a fair EIR or be tolerated by the City of Los Angeles or the surrounding neighborhoods.

Response No. 29.8

Refer to the response to Comment 29.2 above for an explanation of the selection of No Project Alternatives (2) and (3) (i.e., the commercial office and multi-family residential alternatives). This comment does not require any changes or additions to the Draft EIR.

Comment No. 29.9

One viable alternative would be to discontinue the Master Plan and construct a new one which avoids the significant impacts of the proposed Master Plan.

Response No. 29.9

As is shown in Table VI-1 in Section VI, of the four Project Alternatives evaluated in detail (i.e., No Project Alternative (1), No Project Alternative (2), No Project Alternative (3), and Renovated East Building Alternative), No Project Alternative (1) would reduce the significant and unavoidable impacts related to construction noise and traffic (and, as such, neighborhood effects) associated with the Master Plan. It should be noted, however, that No Project Alternative (1) would create new significant impacts related to views and visual character that would not occur under the Master Plan, and would not meet the objectives of the Master Plan. This comment does not require any changes or additions to the Draft EIR.

Comment No. 29.10

Specific Deficiencies

It important to note at the outset the legislative intent of CEQA. The intent of the Legislature overrides any specific provision of the act and no provision of the act should be interpreted so as to violate that intent. Section 21000 of that Act provides in relevant part: (b) It is necessary to provide a high-quality environment that at all times is healthful and pleasing to the senses and intellect of man. (Think residential neighborhoods surrounding the Bundy Campus.)...(e) Every citizen has a responsibility to contribute to the preservation and enhancement of the environment. (“Every citizen”, of course, includes all members of government and state and local agencies and whatever preeminence the SMC District may enjoy as a state agency is overridden by this provision. And, ... (g) It is the intent of the Legislature that all agencies of the state government which regulate activities of private individuals, corporations, and public agencies ... shall regulate such activities so that major consideration is given to ... providing a decent home and satisfying living environment for every Californian. (Edited and emphasis added.)

In short, the Santa Monica College District, its Board, and the Santa Monica College administration and faculty are all bound to assure that the surrounding neighborhoods be provided with, inter alia, a “satisfying living environment.”

Response No. 29.10

Comment noted. Section 21000 of the CEQA Statute provides the “Legislative Intent” of the Statute. The items specified in Comment No. 29.10, above, as well as the other items listed in Section 21000 describe the purpose of the Statute. These items do not indicate specific environmental documentation that is required to be included in a CEQA document or actions that are required to be taken by a Lead Agency pursuant CEQA. The commenter fails to identify any feasible mitigation measures that were not included in the Draft EIR. Furthermore, the College is confident that it has provided a “good faith effort at full disclosure” of the potential environmental impacts of the proposed Master Plan, as required pursuant Section 15151 of the State CEQA Guidelines. This comment does not require any changes or additions to the Draft EIR.

Comment No. 29.11

Please turn to the Master Plan, at page IV J-10: The face of the Master Plan reveals, incontrovertibly, that the current traffic condition in and around the SMC Bundy campus verges on dysfunctional. It needs not one more automobile whatever thrust into the mess that it is. In the following pages, time and time again, the phrase “significant and unavoidable” occurs, as though, it is predetermined that the surrounding neighborhoods bear this burden.

Response No. 29.11

Refer to the response to Comment No. 29.6 for clarification of the term “significant and unavoidable.” This comment does not require any changes or additions to the Draft EIR.

Comment No. 29.12

The obvious conclusion to draw from the current conditions in traffic is that use of the Bundy campus should be so limited that only a de minimus introduction of additional traffic be permitted.

Response No. 29.12

Refer to the response to Comment No. 29.9 for clarification of the various Project Alternatives analyzed and their comparative impacts. This comment does not require any changes or additions to the Draft EIR.

Comment No. 29.13

The Master Plan, Section V, General Impact Categories, provides insufficient reasons for proceeding with the plan notwithstanding the “significant and unavoidable” impacts. The suggestion that the Plan might improve growth cites neither studies nor other basis and is based on mere speculation. If growth is to be used as a basis for approval of this plan, the EIR must be rewritten with a statement of some basis for the contention.

It should be obvious to all that growth is the last thing needed on this overdeveloped, gridlocked Westside. Growth is fine and it is laudable to provide jobs and economic progress, but that must be weighed against the well justified statement of the CEQA statute which mandates a “satisfying living environment.”

Response No. 29.13

Section V (General Impact Categories) of the Draft EIR does not state that the Master Plan would “improve” growth. To the contrary, the last line on page V-3 of specifically states that “[o]verall, the Master Plan is not anticipated to create substantial growth-inducing impacts.” As a community college campus, SMC accepts students from throughout California, but primarily serves students in the surrounding communities. Likewise, while some faculty and staff may relocate to the area as a result of the 18 new jobs created under the Master Plan, most are expected to already reside in the community or to commute from their existing residences. This comment does not require any changes or additions to the Draft EIR.

Comment No. 29.14

I wish to direct your attention specifically, to Section J, pp. 45-49 and cite each and every use of the phrase “significant and unavoidable” as instances in which the Master Plan provides insufficient mitigating measures and, hence, should not be approved without eliminating these deficiencies. Specifically, pages,

J-45, Bundy and Ocean Park

J-46, Bundy and National

J-46, Bundy and Airport

J-47, 23d Street

J-48, Dewey Street

All significant and unavoidable areas mentioned the section entitled “Level of Significance After Mitigation.”

Response No. 29.14

Refer to the response to Comment Nos. 29.6 and 29.11 for clarification of the term “significant and unavoidable.” This comment does not require any changes or additions to the Draft EIR.

Comment No. 29.15

Finally, the Master Plan did not include a study of one of the most important intersections to be affected, i.e., Rose and Centinela. Traffic at this intersection and on Rose and the other streets immediately south of the Bundy Campus must be studied and discussed in detail as this neighborhood will receive all the traffic diverted from westbound Airport Avenue if the City of Santa Monica refuses to accept westbound traffic (their students trying to get home.) All of this traffic will eventually end up on 23d Street in any event, but, without solving the 23d Street problem it will gratuitously subject the Rose Avenue neighborhood with additional, completely unnecessary, traffic.

The Master Plan fails, without consideration of any other aspect, by its failure to address and provide for sufficient mitigation of this easily foreseen problem.

Without a solution to the certain inundation of Rose and nearby streets and a provision for sufficient mitigation, the entire traffic aspect of the Plan must be scrapped. This flow of traffic will violate and stand on its head the requirement of CEQA of “satisfying living environment.”

Response No. 29.15

The commenter is incorrect in stating that the intersection of Rose and Centinela was not studied. A summary of the analysis of the effects of the Master Plan on the intersection of Centinela Avenue and Rose Avenue (Number 20 of the 27 intersections studied) is provided in Table IV.J-15, Summary of Intersections Impacted Under Each Access Scenario, in Section IV.J (Transportation and Traffic) of the Draft EIR. Tables 11 through 27, Future (2010) Intersection Levels of Service, in Appendix G, Traffic Study, Volume II, Technical Appendices, together with Tables C1 through C31 of Appendix C to Appendix G, Traffic Study, Volume II, Technical Appendices, provide the analysis on which the summary was prepared. This comment does not require any changes or additions to the Draft EIR.

Comment No. 29.16

In addition to my comments, above, I hereby incorporate by reference as though fully set forth herein, all comments, objections, and conclusions set forth in Jay W. Kim's letter to you of 8 November 06 on behalf of the Los Angeles Department of Transportation.

I further contend that the failure of those who prepared the Master Plan to consult with the Los Angeles Department of Transportation (Section 21000 et seq, CEQA) is, in and of itself, grounds which requires rejection of the Master Plan.

Response No. 29.16

Comment noted. SMC has consulted with LADOT throughout the preparation of the Draft EIR and continues to consult with LADOT, particularly with respect to the proposed traffic signal along Bundy Drive. Please refer to Comment Letter No. 6 for additional clarification. This comment does not require any changes or additions to the Draft EIR.

Comment No. 29.17

I respectfully ask that, because the Master Plan provides insufficient mitigation of numerous significant and unacceptable environmental impacts on the surrounding area, that it be rejected as in patent violation of the legislative intent and the specific provisions of the California Environmental Quality Act and for the further reason that common sense and a sense of responsibility on the part of the SMC District demands that the Master Plan be scrapped and alternative non-invasive use be put to the Bundy Campus property.

Response No. 29.17

Comment noted. The College is confident that it has provided a "good faith effort at full disclosure" of the potential environmental impacts of the proposed Master Plan, as required pursuant Section 15151 of the State CEQA Guidelines. This comment does not require any changes or additions to the Draft EIR.

Comment No. 29.18

For your convenience and easy reference, I have included below several provisions of CEQA adverted to in my letter.

§ 21000. Legislative intent

The Legislature finds and declares as follows:

(a) The maintenance of a quality environment for the people of this state now and in the future is a matter of statewide concern.

(b) It is necessary to provide a high-quality environment that at all times is healthful and pleasing to the senses and intellect of man.

(c) There is a need to understand the relationship between the maintenance of high-quality ecological systems and the general welfare of the people of the state, including their enjoyment of the natural resources of the state.

(d) The capacity of the environment is limited, and it is the intent of the Legislature that the government of the state take immediate steps to identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached.

(e) Every citizen has a responsibility to contribute to the preservation and enhancement of the environment.

(f) The interrelationship of policies and practices in the management of natural resources and waste disposal requires systematic and concerted efforts by public and private interests to enhance environmental quality and to control environmental pollution.

(g) It is the intent of the Legislature that all agencies of the state government which regulate activities of private individuals, corporations, and public agencies which are found to affect the quality of the environment, shall regulate such activities so that major consideration is given to preventing environmental damage, while providing a decent home and satisfying living environment for every Californian.

15126. Consideration and Discussion of Environmental Impacts

All phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation. The subjects listed below shall be discussed as directed in Sections 15126.2, 15126.4 and 15126.6, preferably in separate sections or paragraphs of the EIR. If they are not discussed separately, the EIR shall include a table showing where each of the subjects is discussed.

(a) Significant Environmental Effects of the Proposed Project.

(b) Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented.

(c) Significant Irreversible Environmental Changes Which Would be Involved in the Proposed Project Should it be Implemented.

(d) Growth-Inducing Impact of the Proposed Project.

(e) The Mitigation Measures Proposed to Minimize the Significant Effects.

(f) Alternatives to the Proposed Project.

§ 21100. Environmental impact report on proposed state projects; significant effect; cumulative impact analysis

(a) All lead agencies shall prepare, or cause to be prepared by contract, and certify the completion of, an environmental impact report on any project which they propose to carry out or approve that may have a significant effect on the environment. Whenever feasible, a standard format shall be used for environmental impact reports.

(b) The environmental impact report shall include a detailed statement setting forth all of the following:

(1) All significant effects on the environment of the proposed project.

(2) In a separate section:

(A) Any significant effect on the environment that cannot be avoided if the project is implemented.

(B) Any significant effect on the environment that would be irreversible if the project is implemented.

(3) Mitigation measures proposed to minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy.

(4) Alternatives to the proposed project.

(5) The growth-inducing impact of the proposed project.

(c) The report shall also contain a statement briefly indicating the reasons for determining that various effects on the environment of a project are not significant and consequently have not been discussed in detail in the environmental impact report.

(d) For purposes of this section, any significant effect on the environment shall be limited to substantial, or potentially substantial, adverse changes in physical conditions which exist within the area as defined in Section 21060.5.

(e) Previously approved land use documents, including, but not limited to, general plans, specific plans, and local coastal plans, may be used in cumulative impact analysis.

(Emphasis added.)

Response No. 29.18

This comment does not raise any issues regarding CEQA or the adequacy of the EIR. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 30

From: [Zina Josephs] ZinaJosephs@aol.com [mailto: ZinaJosephs@aol.com]
To: LAWSON_RANDAL
Cc: ZinaJosephs@aol.com
Subject: Bundy Campus EIR comment
Sent: Monday, November 13, 2006 4:59 PM

Comment No. 30.1

Regarding the Bundy Campus EIR, I have a personal comment, not on behalf of the FOSP Board.

The document states that peak college-related traffic is estimated to occur from 9 to 10am and from 5:45-6:45pm. Here is an anecdotal account of what traffic is currently like on 23rd Street:

On November 2, 2006, the date of the Community Meeting at the Bundy Campus, I tried to go to the grocery store at 5:00pm. I live on 23rd St. north of Ocean Park Blvd., and traffic was already at a standstill in front of my home. I had planned to drive to Gelson's, about 2 blocks SW of Walgrove and Washington Blvd.

After 3 signal sequences, when I had not yet reached Ocean Park Blvd., I gave up on Gelson's, cut through an alley, and went instead to Bob's Market on OPB and 17th.

That evening, I picked up Lorraine Sanchez at 6:45pm to go to the Community Meeting. She lives on Pier, east of 23rd. She suggested that we go south on 23rd, east on Airport Ave., and south on Centinela to get to the Bundy Campus. But we couldn't do that because southbound traffic on 23rd was still at a standstill south of Pier.

Residents in this neighborhood already have difficulty leaving and returning to our homes during rush hour. We don't blame all of this on the college. We realize that development in Santa Monica and in West Los Angeles and Marina del Rey all affect the increase in traffic cutting through our neighborhood.

Response No. 30.1

This comment does not raise any issues regarding CEQA or the adequacy of the EIR. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

Comment No. 30.2

But when the college recommends Access Alternative B4 for the Bundy Campus, which includes permanent "full access" to Airport Ave., the message to Sunset Park residents is that:

1) SMC administrators evidently think the Santa Monica City Council was joking when it voted to give the college only "temporary access" to Airport Ave., until the City of L.A. installs a traffic signal at the Bundy Driveway, and

Response No. 30.2

The College's selection of Access Alternative B4 as a preferred Access Alternative in the Draft EIR is not dependent on the City of Santa Monica City Council's decision regarding the access to Airport Avenue at Donald Douglas Loop South. This comment raises policy concerns well beyond the scope of this Draft EIR.

Comment No. 30.3

2) SMC administrators evidently have no intention of taking into consideration the impact of continued enrollment growth and the resulting increase in traffic on the surrounding community.

Response No. 30.3

This comment is incorrect in suggesting the Draft EIR failed to consider the impact of enrollment growth at the Bundy Campus and the resulting traffic impacts in the surrounding community. To the contrary, the Draft EIR studied such traffic impacts at all intersections and street segments identified by the Cities of Santa Monica and Los Angeles for such study. Furthermore, as is described in the responses to Comment Nos. 7.6 and 8.10, Section IV.J (Transportation and Traffic) of the Draft EIR involves a detailed analysis of 16 Access Alternatives. The analysis shows that, after mitigation, all Access Alternatives would result in significant traffic impacts at four intersections and two to three street segments. This comment does not require any changes or additions to the Draft EIR.

Comment No. 30.4

Why didn't the document recommend an Access Alternative in line with the position taken by the Santa Monica City Council?

Response No. 30.4

Refer to the response to Comment No. 30.2, above. This comment raises policy concerns well beyond the scope of this Draft EIR.

Comment No. 30.5

The Los Angeles Community College District, with 9 campuses spread across a city of 4,000,000, had a total enrollment in Fall 2005 of 114,701.

(http://www.laccd.edu/about_us/fast_facts.htm)

The Santa Monica Community College District, which consists of Malibu and Santa Monica (combined population ca. 100,000) had a total enrollment on September 20, 2006 of 29,960. (<http://www.smc.edu/research/>) 83% of SMC students live in Los Angeles and could just as easily attend classes at West L.A. or one of the other L.A. campuses, if the LACCD advertised as aggressively as SMC does.

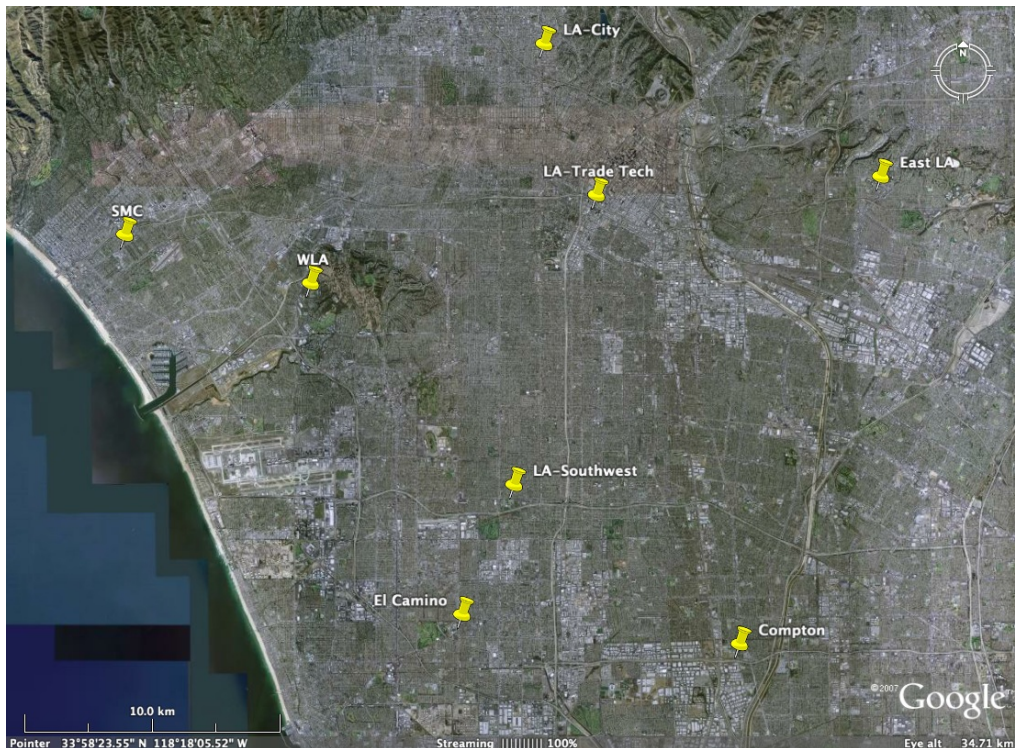
Many of us are willing to make sacrifices for the ca. 12,500 students in our local K-12 schools, because they serve primarily local students.

But for the college to continue to expect us to quietly accept more and more students, and more and more traffic, negatively impacting the quality of life in our neighborhoods, when only 17% of SMC students live in Santa Monica or Malibu, I feel is above and beyond the call of duty.

Response No. 30.5

There are currently 1,053 school districts (K-12) in the State of California; however, there are only 72 community college districts. California provides its residents with three systems of higher education (University of California, California State Universities, and California Community Colleges). All California residents may attend any of these colleges without regard to geographic boundaries.

Community Colleges within Los Angeles Metropolitan Basin Area



When Santa Monica College was founded in 1929, the nearest other community college was Los Angeles City College on Vermont Avenue. As a result, many generations of families from throughout the Westside of Los Angeles and from neighboring areas have taken classes at SMC. Funding to provide instruction for these students is allocated by the State based on attendance, with revenues coming from an undivided mix of state-wide local property taxes, State sales and incomes taxes, and student fees.

SMC's size provides local Santa Monica and Malibu residents with a large selection of course offerings, and about 7,300 Santa Monica residents take credit or non-credit academic classes at SMC each year.

Thirty-five to 40 percent of the graduating class of Santa Monica High School typically enrolls at Santa Monica College to begin freshman studies, and these students are able to benefit from the academic rigor and the large number of student services available.

West Los Angeles College was founded in 1969 and is the only neighboring community college within ten miles of Santa Monica College. West Los Angeles College currently has a number of new facility projects completed, under construction, or in planning, and a number of program initiatives underway. Nonetheless, West Los Angeles College has not yet been able to achieve the depth and breadth of programs that are provided by Santa Monica College, and for this reason, Santa Monica College continues to be the preferred choice for many students. (See Table IV-2, below.)

Table IV-2
2005-06 Transfers to UC and CSU

Community College	UC (students)	CSU (students)	Total (students)
Santa Monica College	903	1,266	2,169
West Los Angeles College	35	220	255
<i>Source: Santa Monica College, January 2007.</i>			

SMC's enrollment is comparable to that of other Los Angeles Metropolitan area community colleges. In Spring 2006, Pasadena City College reported an enrollment of 27,202 students; Santa Monica College reported an enrollment of 25,467 students; and El Camino College reported an enrollment of 22,373 students. These enrollments figures do not include K-12 students enrolled in "dual enrollment" programs taught at area high schools or students enrolled in SMC's Emeritus College.

Santa Monica College recently surveyed 4,812 Santa Monica residents in order to provide residents with the opportunity to weigh in on the issue of balancing educational needs with access. In answering the question, "should SMC reduce student enrollment in order to manage traffic and parking problems?," 90% of the respondents city-wide answered "No" and 80% of the respondents in Sunset Park answered "No."

This comment does not raise any issues regarding CEQA or the adequacy of the EIR; rather, it raises policy concerns well beyond the scope of this Draft EIR. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 31

From: Rob Kadota robkadota@yahoo.com

To: LAWSON_RANDAL LAWSON_RANDAL@smc.edu

Cc: <ponton@marvista.org>, keith@web-coyote.com

Subject: Comments and Questions re: SMC Bundy Campus Master Plan - Draft EIR

[Letter Subject: Comments on Draft Environmental Impact Report, SMC Bundy Campus Master Plan]

Date: Mon, 13 Nov 2006 11:03:54 -0800

[Letter date: November 13, 2006]

Comment No. 31.1

Thank you for the opportunity to comment on the Draft EIR Report for the SMC Bundy Campus Master Plan. While the Mar Vista Community Council (MVCC) has a formal SMC Bundy Campus Committee, and many of its representatives were in attendance at the November 2, 2006 meeting, the timing of the hearing and deadline to comment were too short for us to be able to convene a meeting of the committee or the Mar Vista Community Council Board of Directors as a whole. Therefore my following comments reflect my personal point-of-view versus a statement by the Chair of Mar Vista Community Council or the MVCC Board of Directors.

Response No. 31.1

Comment noted.

Comment No. 31.2

1. The EIR needs to be upfront in the project description about potential programs that may take place over time at the Bundy Campus. It is hard to predict future enrollment needs, and I suspect that once the campus is completely built out, SMC will adjust classes and purposes over time as enrollment needs evolve. Also, I suspect that students attending classes at the Bundy campus will always have some reasons to go to the Main Campus (such as for the library, registration, financial aid, bookstore and more), so the DEIR should use a "highest use scenario" and disclose the maximum number of students and faculty that might use the campus. Additionally, I believe there are existing parking shortages at other SMC campuses and the Bundy campus will again become a major relief valve if another SMC shuttle system or a Big Blue Bus shuttle begins operation as mentioned at the November 2 meeting. It might be more realistic to study an alternative that looks at the campus as a higher use facility with a shuttle system, and study the impacts accordingly, than to pose the highly unlikely alternative of a large commercial development, which the surrounding community and neighborhood associations would likely oppose strenuously and which I do not personally think could realistically ever be built at this site.

Response No. 31.2

The Draft EIR provides information regarding potential programs that may take place over time. The final Master Plan proposes to expand the number of classrooms on site from 16 existing classrooms to a new total of 30 classrooms. For planning purposes, the average class size is 30 students per class. Prior studies have confirmed the accuracy of this planning estimate. Based on these factors and the staffing required, the EIR calculates that there will a maximum number of 929 persons onsite at any given time.

The Bundy Campus currently operates with fully-staffed counseling, library service, computer study labs, and bookstore service, and will continue to do so. All enrollment and registration is online. Application for financial aid is partly online and partly through the U.S. mail. Students who wish to attend campus events, lectures, seminars, and club meetings during school hours or who wish to interact with College staff housed on the main campus may use a reliable, punctual, and free intercampus transit.

The Shuttle Program ceased operating from the Santa Monica Airport in August 2005 and has since operated from the Santa Monica Beach. Santa Monica College has purchased a site for future use for the Shuttle Program.

Comment No. 31.3

2. I am concerned that construction noise has been determined to be significant but unavoidable, and yet, don't believe that much thought was put into proposing mitigation measures to reduce the impacts as much as possible before giving up on complete reduction. Mitigation Measure G-2 is just the regular construction hours that the City of Los Angeles requires. It is not really a specific project mitigation. The City of Santa Monica has a more restrictive noise ordinance, and Santa Monica College should at least employ their standard noise restrictions and not treat its Los Angeles neighbors as if they have less of a right to noise reduction as Santa Monica neighbors. To begin with, I ask that construction begin later, as permitted in Santa Monica, and that noise exceeding 90 dBA** (**Such as jack hammering, pile driving, or pavement breaking) be limited to the hours between 10:00 am and 3:00 pm. Additionally, a noise expert should be consulted to think up additional possible mitigation measures.

Response No. 31.3

As described in the response to Comment Nos. 5.16 and 8.6, while the City of Santa Monica provides numerical thresholds for noise standards, the City of Los Angeles requires that construction noise be reduced to the extent "technically feasible," (LAMC Sec. 112.05), which may be more, equal to, or less stringent than as required under City of Santa Monica noise standards. It should be noted that the Draft EIR recommends more stringent restrictions on the hours of construction activities related to the buildout of the Master Plan than are required by the City of Los Angeles Noise Ordinance.

Section IV.G (Noise) of the Draft EIR has been prepared by a noise specialist.

Comment No. 31.4

3. Mitigation Measure G-4 does not require notification of enough of our neighborhood. Two weeks notice should be given prior to demolition and construction to neighbors as far south as Rose Avenue and to the first block west of Stewart, as they will also be inconvenienced by the college's construction. I also request that a copy of this notice be sent to the Mar Vista Community Council so that they are aware of construction activity.

Response No. 31.4

As stated in the response to Comment No. 5.17, Section III (Corrections and Additions to the Draft EIR) of the Final EIR includes revisions to Mitigation Measure G-4 to broaden the scope of neighborhood and agency notification prior to demolition and construction activities on the Bundy Campus. These changes do not change any findings or conclusions contained within the Draft EIR.

Comment No. 31.5

4. As mentioned at the community meeting on November 2, the DEIR has not properly analyzed the scenario that already takes place and will increase with imposition of a right-turn only lane from the campus to Donald Douglas Loop of drivers turning south on Bundy Drive from the Campus and then turning west onto Rose Avenue or Palms Boulevard. Trips will be generated by this activity and it needs to be included in the description for the Transportation section and then analyzed.

Response No. 31.5

The Draft EIR fully analyzes the access scenario identified by the commenter. However, the Draft EIR recommends Scenario B4, which allows both east and west turns from the egress road leading from the Bundy Campus site to the intersection of Airport Avenue and Donald Douglas Loop South, subject to a prohibition against westbound turns during the a.m. peak period (from 7:00 a.m. to 9:00 a.m.).

Comment No. 31.6

5. Although I thank SMC for its stated commitment to keeping the Stewart Street gate closed except for emergency or maintenance uses, I would feel more secure if this closure was included as a mitigation measure, because the community has not received any legally binding assurance from the college of this condition remaining forever. If future administrations allowed the Stewart gate to be used, it would have disastrous impacts on our neighborhood, and the EIR has not analyzed these impacts at all.

Response No. 31.6

The use of the Stewart Avenue gate for emergency vehicles only or to perform routine maintenance on the wall or parkway west of the wall is included in the Bundy Campus Master Plan project description and the Project Description of the Draft EIR.

Comment No. 31.7

6. Mitigation Measure J-3 includes making changes to the lanes on Bundy Drive at Bundy Driveway. Please include information on the feasibility of how the southbound approach can be ‘widened.’ Please ensure that the feasibility of such a mitigation measure includes consideration of whether this will be “widened” within the public right-of-way or through the use of private property. Will alignment of striping on the street, including transitions, need to be changed? How will this affect pedestrian access and access to and location of transit stops?

Response No. 31.7

LADOT has been working with SMC on the proposed half traffic signal and street widening. The exact placement of the driveway, the timing and coordination of the two traffic signals, and the configuration of the lane assignments for both intersections (Bundy Drive/SMC Driveway and Bundy Drive/Airport Avenue) are currently being evaluated by LADOT.

The intent is to extend the currently existing deceleration lane that runs north of Airport Avenue on the west side of Bundy Drive and that extends nearly to the northern edge of the Bundy Campus property line further south to align with the new Northeast Bundy Campus Driveway. The design provides for improved pedestrian access and the relocation of the transit stop to the north side of the new driveway and south of Airport Avenue.

Comment No. 31.8

7. Because of the uphill driveway exits to Bundy, when classes get out (or a shuttle brings students back at the end of the day) and many cars are waiting to turn right, a tremendous amount of exhaust is released by those cars as they wait their turns to go up the hill. The EIR has not considered this situation and has therefore not sufficiently and adequately addressed its air quality impacts.

Response No. 31.8

See response to Comment Nos. 8.6 and 8.7. As stated, the mitigation measures prescribed in Section IV.C (Air Quality) of the Draft EIR follow SCAQMD Rule 403 guidelines and would adequately mitigate the Master Plan’s construction emission impacts to a less-than-significant level. Refer to Tables IV.C-6 and IV.C-7 on pages IV.C-25 and IV.C-26 of the Draft EIR, which show that on-site emissions generated at the Bundy Campus during the various phases of construction would not exceed the established regional or localized emissions thresholds recommended by the SCAQMD. Overall, the College is confident that it has exhibited a “good faith effort at full disclosure” in the Draft EIR of all potential environmental impacts of the Bundy Campus Master Plan, including those associated with air quality.

Comment No. 31.9

Again I want to thank you for the opportunity to comment on the Draft Environmental Impact Report for the SMC Bundy Campus Master Plan. I’ve appreciated the willingness of your staff to work with the

stakeholders and Board of the Mar Vista Community Council. In fact we had the installation ceremony of our new officers in the SMC Bundy Campus multipurpose room this past June. I look forward to your response to my comments and questions.

Response No. 31.9

This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 32

From: "Michael S. Klein" <aq873@lafn.org>
Subject: Bundy Campus traffic
To: "LAWSON_RANDAL" <Lawson_Randal@smc.edu>
Date: Wed, 1 Nov 2006 18:27:20 -0800

Comment No. 32.1

As Santa Monica residents who live near the campus, we support SMC, but are also very concerned about the amount of traffic generated by the college in general and, specifically by your new Bundy Campus.

Response No. 32.1

This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

Comment No. 32.2

Currently, 23rd Street/Walgrove is often gridlocked at rush hour. This is very disruptive to our neighborhood and our safety. We worry not only about daily travel and the health and safety of our children and neighbors, but also about emergency access, including fire trucks, police cars, ambulances or, the necessity for evacuation in the event of a disaster.

We supported your expansion to the Bundy campus with the conditions that:

1. Parking on the Bundy Campus was to be limited to the current 609 parking spaces, and
2. Any access to Airport Avenue was to be "egress only," with permanent turn restrictions to prevent cars from turning west toward 23rd St.

With those limitations, things have seemed to work at least reasonably well for residents and students.

Response No. 32.2

This comment does not raise any issues regarding CEQA or the adequacy of the EIR. Nonetheless, as described in detail in Section IV.J (Transportation and Traffic) of the Draft EIR, limiting Bundy Campus parking to 609 parking spaces would not provide sufficient parking for the Bundy Campus and could result in adverse parking impacts in the surrounding neighborhood. The access scenario identified by the commenter is one of many Access Alternatives analyzed in the Draft EIR traffic analysis. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

Comment No. 32.3

Now, if we understand correctly, the college has developed a Bundy Campus Master Plan and a draft EIR that shows:

*an additional 2-story classroom building,

*780 parking spaces,

*5317 daily car trips in 2010, and

*recommends “full access” (in-and-out, right-and-left-turns) to Airport Ave.”

Response No. 32.3

While the commenter has correctly identified one of the 16 access alternatives studied in the Traffic Study (i.e., Access Alternative B4) which would involve full access to Airport Avenue at Donald Douglas Loop South, it should also be noted that Mitigation Measure J-2 recommends a left turn prohibition out from the driveway at Donald Douglas Loop South onto Airport Avenue during between 7:00 and 9:00 a.m. (see page I-25 and page IV.J-46 of the Draft EIR). This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

Comment No. 32.4

As we understand it, this would bring about 1,000 additional car trips into the Airport/Walgrove/23rd intersection, bringing that intersection up to 25,000 cars per day, 10,000 more than recommended by Santa Monica’s own Traffic Management department.

What gives here? Is this going to be like the camel’s nose in the tent? Pretty soon, are we going to have the whole camel? I hope not. That is not what we expect from SMC.

We think that the conditions #1 and #2 mentioned above should both continue to be effective. In other words, you should limit the parking to the current number of spaces and continue to have access to Airport Avenue as egress only.

Thanks!

Response No. 32.4

This comment does not raise any specific question or comment regarding the adequacy of the analyses contained in the Draft EIR. It should be noted that under no study scenario does the Proposed Project generate 1,000 daily car trips traveling through the intersection of Airport Avenue and 23rd Street/Walgrove Avenue (refer to Section IV.J (Transportation and Traffic) of the Draft EIR, and the response to Comment No. 7.8 previously provided). This comment is noted for the record and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 33

From: [Karen Kunstler] KP KUNSTLER [mailto: kkunstler@msn.com]
To: LAWSON_RANDAL
Subject: Traffic problems in Santa Monica
Sent: Monday, November 13, 2006 5:47 PM

Comment No. 33.1

I live on Pier Ave. and oppose full access onto Airport Ave. from or to SMC airport campus.

Response No. 33.1

This comment does not raise any issues regarding CEQA or the adequacy of the EIR. The access scenario identified by the commenter is one of many Access Alternatives analyzed in the Draft EIR traffic analysis. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 34

From: [Jeanne Laurie] jeannelaurie [jeannelaurie@msn.com]
Subject: Master Plan & EIR for the Bundy Campus
To: "LAWSON_RANDAL" <Lawson_Randal@smc.edu>
Date: Mon, 13 Nov 2006 11:41:50 -0800

Comment No. 34.1

This matter has already been addressed. The intelligent decision [h]as already been made to eliminate cars exiting the campus using the Airport Blvd/23rd Street exit.

SMC has an enormous amount of power. It does not have the moral obligation to abuse that power. There are thousands of people with different objectives in the City of Santa Monica. All entities should keep in mind the damage that can be caused by taking a one-sided view.

Whatever is convenient for SMC is not necessarily what is good for all the people of Santa Monica. Even with the large number of people involved with SMC, it is not a fraction of all the people who live or work in Santa Monica. It is not good PR for SMC or good for the neighborhood to overburden the already overburdened streets with additional traffic and air pollution.

College students are not known for their patience and good judgment. Each car crash and injury will be attributable to the people at the college making any decision to open traffic on 23rd Street. The lawsuits will come when there is such clear evidence that it was a willful choice of the college decision makers to create such a dangerous and harmful situation having known the potential danger.

Therefore, I echo the recommendations of the Friends of Sunset Park.

Therefore, the Board of Friends of Sunset Park, while supporting the educational mission of Santa Monica College, but in order to mitigate traffic impacts from the Bundy Campus on our residential neighborhoods, strongly recommends that:

- 1) Parking on the Bundy Campus be limited to the current 609 parking spaces, and that
- 2) Any access to Airport Ave. be limited to “egress only” with permanent “right-turn-only” turn restrictions to prevent cars from turning west toward 23rd St.

Response No. 34.1

This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. Nonetheless, as described in detail in Section IV.J (Transportation and Traffic) of the Draft EIR, limiting Bundy Campus parking to 609 parking spaces would not provide sufficient parking for the Bundy Campus and could result in adverse parking impacts in the surrounding neighborhood. The access scenario identified by the commenter is one of many Access Alternatives analyzed in the Draft EIR traffic analysis. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 35

From: Catherine McCabe [catherinemccabeis@hotmail.com]
Subject: SMC Bundy Campus traffic
To: LAWSON_RANDAL
Date: Wed, 01 Nov 2006 17:49:05 -0800

Comment No. 35.1

The traffic north and south on 23rd/Walgrove approaching Airport Avenue is ALREADY a living NIGHTMARE!

It is bad enough that residents in the neighborhood (and let me remind you - this IS a residential neighborhood!) have to contend with existing vehicle traffic, increasing air traffic and the risks and noise pollution they bring - now SMC wants to use Airport Avenue westbound to worsen an already dangerous and unacceptable situation in the neighborhood.

Please sir, I ask that you heed the recommendation of Santa Monica's OWN Traffic Management Division. It seems we are waging a day-to-day war here in Sunset Park to preserve our quality of life - and it feels like we're getting hit from ALL sides! I urge you to help us - please do not allow this to happen!

Thank you for your consideration.

Response No. 35.1

This comment does not raise any issues regarding CEQA or the adequacy of the EIR. For clarification, the Lead Agency for environmental review of the Bundy Campus Master Plan is the Santa Monica Community College District not the City of Santa Monica. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 36

Lee Peterson
1900 Pico Boulevard
Santa Monica, CA 90405
November 13, 200[6]

Comment No. 36.1

This is a comment regarding the adequacy and completeness of the Environmental Impact Report (EIR) for the Bundy Campus Master Plan.

I believe that the EIR is incomplete because it fails to address three related possibilities that have been discussed previously at meetings of the Board of Trustees and other college groups. The cost savings to the college of addressing these possibilities up front are potentially very large.

First, the EIR should discuss what the impact would be of building a four-story building rather than a two-story building next to the existing four-story building. The college has a history of adding floors to buildings. Using the same footprint but with additional floors would reduce the college's need for additional buildings around the District, each of which generates traffic and has other environmental impacts.

Response No. 36.1

The Project Description provided in the Draft EIR (retention and buildout of the existing four-story West Building and the replacement of the existing two-story East Building with a New Building of comparable size, adjusted to meet standards of accessibility and technology) meets the educational needs of the college as determined during the Master Planning process (refer to pages II-7 and II-13 of the Draft EIR).

Comment No. 36.2

Second, the EIR should discuss the impact of using the new two-story building proposed by the EIR to provide a new location for the back-office functions currently performed at 2714 Pico Boulevard. This possibility of consolidating functions onto fewer sites has been raised at Board of Trustee meetings. Consolidation would reduce automotive traffic between sites, increase the efficiency of intra-district bus services, and reduce energy demand for heating and cooling multiple buildings, among other benefits. Using Bundy for full-time staff would also reduce in-and-out traffic at the Bundy site as employees tend to park for eight hours at a time.

Response No. 36.2

The purpose of the Bundy Campus Master Plan is to meet future educational needs as were determined during the Master Planning process which began in February 2005. The Master Plan process concluded that the future educational needs of the College can be met by the Proposed Project combined with the utilization of the square footage currently on the Bundy Campus site (adjusted to meet standards of accessibility and technology). If the College determines that the additional classrooms planned for the Bundy Campus are no longer needed, the College could use the available space for office uses. This use is consistent with the Bundy Campus Master Plan and does not require further analysis.

Comment No. 36.3

Third, in a combination of the first two ideas, the EIR should discuss the impact of building a new four-story building next to the existing four-story building, but with classrooms and student services on the lower two floors and back-office functions currently performed at 2714 Pico on the upper two floors. Since the official name for the 2714 Pico Boulevard Building is the "Temporary Administration Building", it can reasonably be concluded that the District intends to sell the 2714 site at some point.

Selling the 2714 building would generate one-time revenue as well as the on-going benefits of site consolidation. Using two floors of a new 4-story building for classrooms would presumably increase the student population to that required to minimize student traffic District-wide plus provide for an educational program that would generate revenue sufficient to cover district expenses in a more economical manner.

Response No. 36.3

The Project Description provided in the Draft EIR (retention and buildout of the existing four-story West Building and the replacement of the existing two-story East Building with a New Building of comparable size, adjusted to meet standards of accessibility and technology) meets the educational needs of the college as determined during the Master Planning process (see pages II-7 and II-13 of the Draft EIR).

COMMENT LETTER No. 37

From: Grace Phillips [mailto: gracesadye@gmail.com]
To: LAWSON_RANDAL
Subject: Bundy EIR
Sent: Sunday, November 12, 2006 1:37 PM

Comment No. 37.1

I oppose full access from the Bundy Campus onto Airport Ave. The traffic burden from SMC is already unbearable. If you aren't responsive to community concerns the next election will bring in a spate of candidates who will shrink enrollment in order to ameliorate traffic. Please listen to us - stay with the current "exit-only" and "right-turn-only" system.

Response No. 37.1

This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. Nonetheless, the access scenario identified by the commenter is one of many Access Alternatives analyzed in the Draft EIR traffic analysis. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 38

From: Sharon Polito [sharonpolito@mac.com]
Subject: Airport
To: LAWSON_RANDAL
Date: Monday, November 13, 2006 11:33 AM

Comment No. 38.1

I am a concerned Sunset Park resident who doesn't want to see any more unnecessary traffic routed into the Airport Avenue area. Changing the SMC traffic flow in this area will have a huge impact on the already terrible safety of this area. Our neighborhood has endured continual encroachment of traffic and parking problems from your college, but this is the first time I've ever taken the time to write a letter about it. That intersection is too dangerous already, and adding traffic to the area is just wrong. Please find another place to route your traffic.

Response No. 38.1

This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. Nonetheless, the access scenario identified by the commenter is one of many Access Alternatives analyzed in the Draft EIR traffic analysis. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No, 39

From: Johanna Rogers [johannakrogers@yahoo.com]
Subject: SMC - Bundy Campus parking issue
To: LAWSON_RANDAL
Date: Thursday, November 2, 2006 9:19 AM

Comment No. 39.1

I am a resident of Sunset Park, and wanted to provide my feedback concerning the proposed changes in parking at the Bundy Campus. I support the following requests that FOSP has submitted :

1. Parking on the Bundy Campus be limited to the current 609 parking spaces, and
2. Any access to Airport Avenue be "egress only," with permanent turn restrictions to prevent cars from turning west toward 23rd St.

The proposed changes in parking would bring about 1,000 additional car trips into the Airport/Walgrove/23rd intersection, bringing that intersection up to 25,000 cars per day, 10,000 more than recommended by Santa Monica's own Traffic Management department. - We can not and should not

be forced to bear this additional burden. It presents a nuisance and danger to the families that have chosen this neighborhood as their home. We already have to pay exorbitant property taxes on the school, and deal with the loud music and traffic made by students in transit...this is one more thing we should not be forced to endure.

Thanks for your consideration,

Response No. 39.1

This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. Nonetheless, as described in detail in Section IV.J (Transportation and Traffic) of the Draft EIR, limiting Bundy Campus parking to 609 parking spaces would not provide sufficient parking for the Bundy Campus and could result in adverse parking impacts in the surrounding neighborhood. The access scenario identified by the commenter is one of many Access Alternatives analyzed in the Draft EIR traffic analysis. It should be noted that under no study scenario does the Proposed Project generate 1,000 daily car trips traveling through the intersection of Airport Avenue and 23rd Street/Walgrove Avenue (refer to Section IV.J of the Draft EIR, and the response to Comment No. 7.8 previously provided). This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 40

From: [Siobhan Schenz] <siobhan.schenz@verizon.net>
Subject: SMC Bundy Campus traffic
To: "LAWSON_RANDAL" <lawson_randal@smc.edu>
Date: Fri, 3 Nov 2006 11:20:50 -0800

Comment No. 40.1

The traffic north and south on 23rd/Walgrove approaching Airport Avenue is unbearable.

This residential neighborhood already contends with an excessive amount of SMC and pass-through vehicle traffic, increasing air traffic and the air and noise pollution they bring - now SMC wants to use Airport Avenue westbound to worsen already inhospitable and dangerous circumstances.

Please heed the recommendation of Santa Monica's Traffic Management Division and do not allow this to happen. Our quality of life in Sunset Park is under constant assault from many places. Please do not make things worse for this family-oriented, residential neighborhood.

Thank you for your consideration.

Response No. 40.1

This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. The recommended alternative was one of many Access Alternatives studied in the DEIR. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 41

Helen L. Spaulding
533 Lincoln Boulevard
Santa Monica, CA 90402
November 10, 2006

Comment No. 41.1

We were out of town when the public meeting was held regarding the environmental impact of the Bundy campus on the neighborhood and the city of Santa Monica. Therefore we wish to make our thoughts known in writing.

We believe that college traffic should be restricted to exit Airport Avenue by way of Bundy Drive only. Bundy Drive is classified by the city of Los Angeles as a major highway. It is two lanes in either direction. The campus is located in Los Angeles close to Bundy Drive.

Response No. 41.1

This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. The recommended alternative was one of many Access Alternatives studied in the DEIR. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

Comment No. 41.2

Walgrove/23rd Street is one lane in either direction. It is already impacted by commuter traffic, carrying far more cars than it can manage. In addition, the speed limit, as cars approach the schools that line Walgrove Avenue before Venice Blvd, is 25 miles an hour, whether or not school is in session.

Response No. 41.2

This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. This comment will be forwarded to the Decision-Makers for their consideration.

Comment No. 41.3

We have read that the traffic impact study projects that less than 200 cars will enter or exit the Bundy Campus lots during commuter hours. That strains credibility, since you are planning to provide 780 on

site parking spaces. Staff normally enters and leaves the campus during regular commuter hours. Students arriving for 8 o'clock classes have similar driving patterns. In addition, we have read that you plan to add more programs, and students, and faculty and staff than now exist.

We fail to see how this will not have a major impact on Santa Monica traffic.

Response No. 41.3

Comment noted. The commenter is correct in stating that the Master Plan's increase in classrooms and programs would result in an associated increase in students, faculty, and staff (see page II-8 of the Draft EIR). The Draft EIR parking analysis, provided in Section IV.J (Transportation and Traffic), found that the Proposed Project would provide an adequate supply of parking to serve the proposed uses. Furthermore, as described in the Bundy Campus Master Plan, the College schedules programs to ensure that adequate on-site parking will be provided at all times. Overall, the College is confident that it has exhibited a "good faith effort at full disclosure" in both the preparation of the traffic analysis as well as the remainder of the Draft EIR. Therefore, this comment does not require any corrections or additions to the Draft EIR.

Comment No. 41.4

And it's hard not to notice that the Madison campus which once provided plenty of parking, has been torn up for construction of yet another auditorium (in addition to the new one on the Pico campus) for more than a year, providing no parking, even on the street.

Thank you for taking time to read our objections.

Response No. 41.4

This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. The Draft EIR addresses the potential environmental impacts of the proposed Bundy Campus Master Plan but is not required to evaluate past, current, or future conditions at SMC's other satellite campuses or the SMC Main Campus. This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER 42

From: Eileen Tunick [mailto: eileenet@earthlink.net]
To: LAWSON_RANDAL
Subject: Access to Walgrove/Marine from Bundy Campus
Sent: Monday, November 13, 2006 9:05 PM

Comment No. 42.1

As a resident homeowner of Sunset Park and a frequent user of the already over-crowded Walgrove Ave, I am strongly against the changing of the right turn only law for the Bundy campus which directs the traffic flow to Centinela instead of the already jammed Walgrove.

Thank you for attending to this urgent need of the residents of Sunset Park.

Response No. 42.1

Comment noted. The recommended alternative was one of many Access Alternatives studied in the DEIR. This comment will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No.43

From: "Bruce Weiller" <bruce_weiller@yahoo.com>
Subject: Bundy Campus EIR
To: "LAWSON_RANDAL" <Lawson_Randal@smc.edu>
Date: Sun, 12 Nov 2006 10:00:41 -0800

Comment No. 43.1

As a resident of Sunset Park and neighbor of SMC, I fully support the position of the Friends of Sunset Park regarding the Bundy Campus.

Namely:

- 1) Parking on the Bundy Campus be limited to the current 609 parking spaces, and that
- 2) Any access to Airport Ave. be limited to "egress only" with permanent "right-turn-only" turn restrictions to prevent cars from turning west toward 23rd St.

This is mainly due to the impacts it will have on traffic, air quality and quality of life for the residents of Sunset Park.

Response No. 43.1

This comment does not raise any issues regarding CEQA or the adequacy of the Draft EIR. Nonetheless, as described in detail in Section IV.J (Transportation and Traffic) of the Draft EIR, limiting Bundy Campus parking to 609 parking spaces would not provide sufficient parking for the Bundy Campus and could result in adverse parking impacts in the surrounding neighborhood. The access scenario identified by the commenter is one of many Access Alternatives analyzed in the Draft EIR traffic analysis. For a detailed analysis of the Proposed Project's traffic, air quality and neighborhood impacts on all surrounding communities, refer to the appropriate topical sections of the Draft EIR (i.e., Sections IV.J, IV.C, and IV.K). This comment has been noted and will be forwarded to the Decision-Makers for their consideration.

COMMENT LETTER No. 44

From: Karin Wholey <Karin.Wholey@hbo.com>
Subject: Please continue to restrict traffic out of the SMC Airport campus
To: "LAWSON_RANDAL" <lawson_randal@smc.edu>
Cc: <zinajosephs@aol.com>
Date: Wed, 1 Nov 2006 17:31:53 -0800

Comment No. 44.1

I live on Hill Street and 18th. We are already choked with traffic on 23rd street to the point that it is very difficult to cross that street with my children to walk to Clover Park from our house. Drivers do not slow or stop for Pedestrians, and frustrated by traffic, they turn off and zoom down the residential streets at high speeds. Unfortunately, college age students are sometimes the worst offenders, ignoring stop signs and talking on their cell phones, making it a very dangerous street.

I will continue to support restrictions that divert rushed student commuter traffic out of my neighborhood.

Response No. 44.1

Comment noted. This comment will be forwarded to the Decision-Makers for their consideration.

VERBAL COMMENTS

The following is a summary of verbal comments provided by the public at the community meeting for the Draft EIR held on November 2, 2006. For commenters who have also submitted written comments on the Draft EIR, a reference to their written comment letter is provided.

COMMENT No. 45

George Chung, City of LA (Mar Vista) area resident, Chair of Ad Hoc committee
11671 National Boulevard
Los Angeles, CA 90069
November 2, 2006

- Does not want to see SMC's Main Campus reduced in size.
- A right turn out of the existing Bundy driveway is dangerous due to the hill and traffic on Bundy Drive.
- Exits should be at Donald Douglas Loop South and the #2 driveway onto Airport Ave to go up and make a right or left onto Bundy Drive.
- Bill Rosendahl agreed to a new signal due to politics and danger at the existing driveway.
- Under Siegler, three Airport Avenue accesses were used; later all were closed.
- The new signal will be too close to the existing Airport Park.
- Even if Donald Douglas Loop South is right-turn only, Santa Monica students will make a U-turn at other driveways or at the Airport Park.
- How many years will the Master Plan be? The College hasn't committed to anything.
- College, Santa Monica and Los Angeles neighbors all need to meet.

COMMENT No. 46

Lauri Crane, Executive Committee Chair, Community for Excellent Public Schools (CEPS)
219 12th Street
Santa Monica, CA 90402
November 2, 2006

- Would like to support campus; more nurses are needed to benefit both cities.
- This project is an opportunity for City of Santa Monica, SMC, and SMUUSD to coordinate.

COMMENT No. 47

Shari Davis, Chair of Community for Excellent Public Schools (CEPS)
348 14th Street
Santa Monica, CA 90402
E-mail: shariceps@aol.com
November 2, 2006

- Supports Bundy Campus because it supports CEPS, goals.
- Bundy Campus Master Plan is a balance of needs and impacts at this site.

COMMENT No. 48

Eric Gabster, Board Member of Friends of Sunset Park
P.O. Box 5825
Santa Monica, CA 90409
November 2, 2006

- Refer to Comment Nos. 7 and 23.

COMMENT No. 49

Glen Howell, City of LA (Mar Vista) area resident/stakeholder
12607 Rose Ave.
Los Angeles, CA 90066
November 2, 2006

- Refer to Comment Nos. 26 and 27.

COMMENT No. 50

Nancy Howell, City of LA (Mar Vista) area resident/ stakeholder
12607 Rose Avenue
Los Angeles, CA 90066
November 2, 2006

- Refer to Comment No 28.

COMMENT No. 51

Otis L. Hubbard, City of LA (Rose Avenue) resident
12547 Rose Ave.
Los Angeles, CA 90066
E-mail: otish13144@aol.com
November 2, 2006

- Refer to Comment No. 29.

COMMENT No. 52

Zina Josephs, Friends of Sunset Park
2454 23rd Street
Santa Monica, CA 90405
E-mail: zinajosephs@aol.com
November 2, 2006

- Refer to Comment Nos. 7 and 30.

COMMENT No. 53

Dave Klaus, City of Santa Monica resident
2113 Dewey Street
Santa Monica, CA 90405
November 2, 2006

- There formerly was a stop sign at the top of the 23rd Street hill. It was removed because people flooded the neighborhood with traffic.

COMMENT No. 54

Keith Lampert, Director of Mar Vista Community Council, Zone 6
E-mail: keith@marvista.org
November 2, 2006

- Refer to Comment No. 8.

COMMENT No. 55

Cathy Larson, City of Santa Monica resident, Friends of Sunset Park
1722 Bryn Mawr Avenue
Santa Monica, CA 90405
E-mail: fospairport@labridge.com
November 2, 2006

- Where is the discussion of traffic between the Bundy Campus and other campuses?
- Where is traffic from Airport Park looked at? That will be 1,000 trips per day, which will be in the PM peak hour during sports practices.
- What mitigation measures are proposed for traffic? It was not in power point presentation.

COMMENT No. 56

Lee Peterson, off-duty SMC employee, Police and Parking Officers labor union member
1900 Pico Boulevard
Santa Monica, CA 90405
E-mail: peterson_lee@smc.edu
November 2, 2006

- Refer to Comment No. 36.

COMMENT No. 57

Victoria Pregler, SMC student, ASB President, area resident (Palms/Beethoven)
1900 Pico Boulevard
Santa Monica, CA 90405
E-mail: smc_as_president2007@yahoo.com
November 2, 2006

- There are not enough students downtown to move all Bundy classes downtown.
- Nursing students also have to take English, Math, etc., and it would be great to not have to go to SMC's Main Campus for that.

- Left turns onto Airport Ave would be better so as not to have to go through residential neighborhoods.

COMMENT No. 58

Lorraine Sanchez, City of Santa Monica resident, Friends of Sunset Park
2344 Pier Avenue
Santa Monica, CA 90405
E-mail: lorrainesanchez@adelphia.com
November 2, 2006

- Refer to Comment No. 7.

COMMENT No. 59

Linda Sullivan, City of Santa Monica area resident
3021 Airport Avenue
Santa Monica, CA 90405
E-mail: lsulli@mindspring.com
November 2, 2006

- The Westside is dense with or without SMC.
- Supports ingress to the campus at Airport Avenue, as well as left egress though not many cars will do that. For example, Beverly Hills students wouldn't turn left onto Airport Avenue.
- The Bundy Campus is intended to reduce impacts at this site.
- The College doesn't create traffic; people create the impacts.
- Formerly worked at the Airport, which was considered a negative land use.