

**APPENDIX B:**  
**PUBLIC COMMENT LETTERS TO THE NOP**

**SUMMARY OF RESPONSE LETTERS TO THE  
NOTICE OF PREPARATION**

SUMMARY OF NOP COMMENT LETTERS SMC MALIBU CAMPUS PROJECT ENVIRONMENTAL IMPACT REPORT	I. Aesthetics	II. Agricultural Resources	III. Air Quality	IV. Biological Resources	V. Cultural Resources	VI. Geology and Soils	VII. Greenhouse Gas Emissions	VIII. Hazardous Materials	IX. Hydrology and Water Quality	X. Land Use Planning	XI. Mineral Resources	XII. Noise	XIII. Population and Housing	XIV. Public Services	XV. Recreation	XVI. Transportation/Circulation	XVII. Utilities	Other Comments and Concerns
<b>State Agencies</b>																		
1. State of California Department of Transportation District 7, Regional Planning IGR/CEQA Branch Dianna Watson, IGR/CEQA Branch Chief 100 Main Street, MS #16 Los Angeles, CA 90012 Date: June 13, 2012																■		
2. State of California Native American Heritage Commission Dave Singleton, Program Analyst 915 Capitol Mall, Room 364 Sacramento, CA 95814 Date: May 21, 2012					■													

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<b>Regional Agencies</b>																		
<p>3. County of Los Angeles Fire Department, Frank Vidales Acting Chief, Forestry Division, Prevention Services Bureau 1320 North Eastern Avenue Los Angeles, CA 90063 Date: June 7, 2012</p>				■	■	■		■	■					■		■		
<p>4. Los Angeles County Metropolitan Transportation Authority Scott Hartwell CEQA Review Coordinator, Long Range Planning One Gateway Plaza Los Angeles, CA 90012 Date: May 24, 2012</p>																■		
<p>4b. Los Angeles County Metropolitan Transportation Authority Development Review Coordinator, Countywide Planning One Gateway Plaza Los Angeles, CA 90012 Date: Oct 22, 2014</p>																■		

<p align="center"><b>SUMMARY OF NOP COMMENT LETTERS SMC MALIBU CAMPUS PROJECT ENVIRONMENTAL IMPACT REPORT</b></p>	I. Aesthetics	II. Agricultural Resources	III. Air Quality	IV. Biological Resources	V. Cultural Resources	VI. Geology and Soils	VII. Greenhouse Gas Emissions	VIII. Hazardous Materials	IX. Hydrology and Water Quality	X. Land Use Planning	XI. Mineral Resources	XII. Noise	XIII. Population and Housing	XIV. Public Services	XV. Recreation	XVI. Transportation/Circulation	XVII. Utilities	<p align="center"><b>Other Comments and Concerns</b></p>	
<p>5. South Coast Air Quality Management District Ian MacMillan, Program Supervisor, CEQA Inter-Governmental Review Planning, Rule Development &amp; Area Sources 21865 Copley Drive, Diamond Bar, CA 91765 Date: June 12, 2012</p>			■																
<p><b>Local Agencies</b></p>																			
<p>6. City of Malibu, Planning Department Joyce Parker-Bozylinski, AICP, Planning Director 23825 Stuart Ranch Road Malibu, CA 90265 Date: June 15, 2012</p>	■			■		■		■	■	■		■					■	■	<ul style="list-style-type: none"> <li>• Project requires Coastal Development Permit</li> <li>• How will Project affect the memorial rose garden, farmer's market (which occurs in a portion of the Civic Center parking lot), tow yard, and communication tower?</li> </ul>
<p><b>Organizations</b></p>																			

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<p>7. Wishtoyo Foundation Mati Waiya, Chumash Ceremonial Elder, Executive Director; Luhui Isha, Cultural Resources and Education Director; &amp; Jason Weiner, Staff Attorney 3875-A Telegraph Road #423 Ventura, CA 93003 Date: July 11, 2012</p>				■	■				■										<ul style="list-style-type: none"> <li>• Opposes Project</li> </ul>
<p><b>Individuals</b></p>																			
<p>8. Sally Benjamin 3216 Colony View Circle Malibu, CA 90265 Date: June 16, 2012</p>																			<ul style="list-style-type: none"> <li>• Concerns over relocation of tow yard and temporary day labor area</li> </ul>
<p>9. Chris and Sally Benjamin 3216 Colony View Circle Malibu, CA 90265 Date: June 17, 2012</p>	■									■		■		■	■	■	■		<ul style="list-style-type: none"> <li>• Concerns over the size and distribution of the Project</li> <li>• Concerns over the operational details and payment of the educational facility and Sheriff station and future growth of SMC.</li> <li>• Concerns over parking spaces for the Project</li> </ul>

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<p>10. Joan Lavine (Owns residential property on Malibu Road) Mailing address provided: 9000 Sunset Blvd., Suite 1001 Los Angeles, CA 90069 Date: June 16, 2012</p>	<p>■</p>													<p>■</p>	<p>■</p>	<p>■</p>	<p>■</p>	<ul style="list-style-type: none"> <li>• Opposes project</li> <li>• Concerns over how the Project will impact the existing organizations and activities that use the Civic Center building.</li> <li>• Concerns over parking availability for existing uses of the Civic Center building.</li> <li>• Concerns over future growth and plans of SMC College District.</li> <li>• Upset over the lack of notice, availability, and communication on the EIR proceedings.</li> </ul>
<p>11. Steve Uhring 23722 Harbor Vista Drive Malibu, CA 90265 Date: June 17, 2012</p>																	<p>■</p>	<ul style="list-style-type: none"> <li>• Concerns over the operational details of SMC.</li> <li>• Concerns over parking for the new facilities</li> </ul>

Source: Parker Environmental Consultants, December 2014.

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7, REGIONAL PLANNING

IGR/CEQA BRANCH

100 MAIN STREET, MS # 16

LOS ANGELES, CA 90012-3606

PHONE: (213) 897-9140

FAX: (213) 897-1337

*Flex your power!  
Be energy efficient!*

June 13, 2012

Mr. Randal Lawson  
Santa Monica Community College District  
1900 W. Pico Boulevard  
Santa Monica, A 90405

Santa Monica College – Malibu Campus  
SCH #2012051052; IGR #120536EA  
Vicinity: SR-1

Dear Mr. Lawson

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Santa Monica College – Malibu Campus Project, located at 23555 Civic Center Drive in Malibu.

The project site consists of an approximately 128,500 square foot (sq. ft.) irregularly shaped ground lease area within the larger 9.18 acre Los Angeles County owned and operated civic center complex. Currently, the former Los Angeles County Sheriff's Station, which was decommissioned in the early 1990s, is located on the proposed project site.

The proposed project will include the demolition of the existing Sheriff's station and the construction of a 2-story above-grade, approximately 27,500 sq. ft., educational facility. It will include ancillary improvements within the project site associated with pedestrian and vehicular access, surface parking, open space, landscaping improvements, and relocation of on-site utilities. The project is expected to yield a net increase of 3,618 sq. ft. as compared to the size of the existing Sheriff's station.

To assist in evaluating the impacts of this project on Pacific Coast Highway (SR-1), please include the following information in the traffic analysis:

1. Traffic impacts on SR-1 and all impacted streets, crossroads and controlling intersections, as well as analysis of existing and future conditions.
2. Traffic volume counts to include anticipated AM and PM peak-hour volumes.
3. Level of service (LOS) before and after development.
4. Future conditions, which include both, project and project plus cumulative traffic generated up to General Plan build out year.
5. A brief traffic discussion showing ingress/egress, turning movements, and a directional flow for project vehicle trips.
6. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts, including sharing of mitigation costs.

Mr. Randal Lawson  
June 13, 2012  
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Caltrans looks forward to reviewing the traffic analysis and expect to receive a copy from the State Clearinghouse when the DEIR is completed. However, to expedite the review process, you may send a copy in advance to the undersigned.

If you have any questions, please feel free to contact Elmer Alvarez, project coordinator, at (213) 897-6696 and refer to IGR #120536EA.

Sincerely,

A handwritten signature in cursive script that reads "Dianna Watson".

DIANNA WATSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse



MAY 25 2012

STATE OF CALIFORNIA

Edmund G. Brown, Jr., Governor

**NATIVE AMERICAN HERITAGE COMMISSION**

915 CAPITOL MALL, ROOM 364  
SACRAMENTO, CA 95814  
(916) 653-6251  
Fax (916) 657-5390  
Web Site [www.nahc.ca.gov](http://www.nahc.ca.gov)  
[ds\\_nahc@pacbell.net](mailto:ds_nahc@pacbell.net)



MAY 25 2012

May 21, 2012

Mr. Randal Lawson, Executive Vice President

**Santa Monica Community College District**

1900 Pico Boulevard  
Santa Monica, CA 90405

Re: SCH#2012051052; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the "Santa Monica College – Malibu Campus Project;" located in the City of Malibu; Los Angeles County, California.

Dear Mr. Lawson:

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3<sup>rd</sup> 604).

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance.' 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. The NAHC did conduct a Sacred Lands File (SLF) search within the 'area of potential effect (APE) and Native American cultural resources were identified.

The NAHC "Sacred Sites," as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American

contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests cooperation from other public agencies in order that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254( r) and may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends 'avoidance' of the site as referenced by CEQA Guidelines Section 15370(a).

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,



Dave Singleton  
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

## Native American Contacts

Los Angeles County

May 21, 2012

Beverly Salazar Folkes  
1931 Shadybrook Drive  
Thousand Oaks, CA 91362  
folkes@msn.com  
805 492-7255  
(805) 558-1154 - cell

Chumash  
Tataviam  
Ferrnandeño

LA City/County Native American Indian Comm  
Ron Andrade, Director  
3175 West 6th St, Rm. 403  
Los Angeles , CA 90020  
randrade@css.lacounty.gov  
(213) 351-5324  
(213) 386-3995 FAX

Barbareno/Ventureno Band of Mission Indians  
Julie Lynn Tumamait-Stennslie, Chairwoman  
365 North Poli Ave  
Ojai , CA 93023  
jtumamait@sbcglobal.net  
(805) 646-6214

Chumash

Owl Clan  
Qun-tan Shup  
48825 Sapaque Road  
Bradley , CA 93426  
mupaka@gmail.com  
(805) 472-9536 phone/fax  
(805) 835-2382 - CELL

Chumash

Patrick Tumamait  
992 El Camino Corto  
Ojai , CA 93023  
(805) 640-0481  
(805) 216-1253 Cell

Chumash

Randy Guzman - Folkes  
6471 Cornell Circle  
Moorpark , CA 93021  
**ndnRandy@yahoo.com**  
(805) 905-1675 - cell

Chumash  
Fernandeño  
Tataviam  
Shoshone Paiute  
Yaqui

San Luis Obispo County Chumash Council  
Chief Mark Steven Vigil  
1030 Ritchie Road  
Grover Beach CA 93433  
(805) 481-2461  
(805) 474-4729 - Fax

Chumash

Coastal Band of the Chumash Nation  
Toni Cordero, Chairwoman  
P.O. Box 4464  
Santa Barbara CA 93140  
cordero44@charter.net  
805-964-3447

Chumash

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2012051052; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Santa Monica College - Malibu Campus Project; located in the City of Malibu; Los Angeles County, California.

## Native American Contacts

Los Angeles County

May 21, 2012

Carol A. Pulido  
165 Mountainview Street Chumash  
Oak View , CA 93022  
805-649-2743 (Home)

Aylisha Diane Marie Garcia Napoleone  
33054 Decker School Road Chumash  
Malibu , CA 90265

Melissa M. Parra-Hernandez  
119 North Balsam Street Chumash  
Oxnard , CA 93030  
envyy36@yahoo.com  
805-983-7964  
(805) 248-8463 cell

Barbareno/Ventureno Band of Mission Indians  
Kathleen Pappo  
2762 Vista Mesa Drive Chumash  
Rancho Pales Verdes CA 90275  
310-831-5295

Frank Arredondo  
PO Box 161 Chumash  
Santa Barbara Ca 93102  
ksen\_sku\_mu@yahoo.com  
805-617-6884  
ksen\_sku\_mu@yahoo.com

Barbareno/Ventureno Band of Mission Indians  
Raudel Joe Banuelos, Jr.  
331 Mira Flores Court Chumash  
Camarillo , CA 93012  
805-987-5314

Santa Ynez Tribal Elders Council  
Freddie Romero, Cultural Preservation ConsInt  
P.O. Box 365 Chumash  
Santa Ynez , CA 93460  
freddyromero1959@yahoo.  
805-688-7997, Ext 37

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2012051052; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Santa Monica College - Malibu Campus Project; located in the City of Malibu; Los Angeles County, California.



# COUNTY OF LOS ANGELES

## FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294  
(323) 881-2401

DARYL L. OSBY  
FIRE CHIEF  
FORESTER & FIRE WARDEN

June 7, 2012

Mr. Randal Lawson, Executive Vice President  
Santa Monica Community College District  
1900 Pico Boulevard  
Santa Monica, CA 90405

Dear Mr. Lawson:

**NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT AND SCOPING MEETING, "SANTA MONICA COLLEGE - MALIBU CAMPUS" PROPOSES THE CONSTRUCTION OF AN EDUCATIONAL INSTRUCTIONAL FACILITY AND A LOS ANGELES COUNTY SHERIFF'S SUBSTATION TO SERVE THE MALIBU COMMUNITY, 23555 CIVIC CENTER DRIVE, MALIBU (FFER #201200072)**

The Notice of Preparation has been reviewed by the Planning Division, Land Development Unit, Forestry Division and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

**PLANNING DIVISION:**

1. We have no comments at this time.

**LAND DEVELOPMENT UNIT:**

1. The statutory responsibilities of the County of Los Angeles Fire Department, Land Development Unit, are the review of and comment on, all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for firefighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department. We are responsible for the review of all projects within Contract Cities (cities that contract with the County of Los Angeles Fire Department for fire protection services). We are responsible for all County facilities, located within non-contract cities. The County of Los Angeles Fire Department, Land Development Unit may also comment on conditions that may

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS  
ARTESIA  
AZUSA  
BALDWIN PARK  
BELL  
BELL GARDENS  
BELLFLOWER  
BRADBURY

CALABASAS  
CARSON  
CERRITOS  
CLAREMONT  
COMMERCE  
COVINA  
CUDAHY

DIAMOND BAR  
DUARTE  
EL MONTE  
GARDENA  
GLENORA  
HAWAIIAN GARDENS  
HAWTHORNE

HIDDEN HILLS  
HUNTINGTON PARK  
INDUSTRY  
INGLEWOOD  
IRWINDALE  
LA CANADA FLINTRIDGE  
LA HABRA

LA MIRADA  
LA PUENTE  
LAKEWOOD  
LANCASTER  
LAWNDALE  
LOMITA  
LYNWOOD

MALIBU  
MAYWOOD  
NORWALK  
PALMDALE  
PALOS VERDES ESTATES  
PARAMOUNT  
PICO RIVERA

POMONA  
RANCHO PALOS VERDES  
ROLLING HILLS  
ROLLING HILLS ESTATES  
ROSEMEAD  
SAN DIMAS  
SANTA CLARITA

SIGNAL HILL  
SOUTH EL MONTE  
SOUTH GATE  
TEMPLE CITY  
WALNUT  
WEST HOLLYWOOD  
WESTLAKE VILLAGE  
WHITTIER

be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment.

2. The County of Los Angeles Fire Department, Land Development Unit comments are only general requirements. Specific fire and life safety requirements and conditions set during the environmental review process will be addressed and conditions set at the building and fire plan check phase. Once the official plans are submitted for review there may be additional requirements.
3. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.
4. The proposed development may necessitate multiple ingress/egress access for the circulation of traffic and emergency response issues.
5. This property is located within the area described by the Forester and Fire Warden as a Fire Zone 4, Very High Fire Hazard Severity Zone (VHFHSZ). All applicable fire code and ordinance requirements for construction, access, water mains, fire hydrants, fire flows, brush clearance and fuel modification plans, must be met.
6. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways, with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.
7. Access roads shall be maintained with a minimum of 10 feet of brush clearance on each side. Fire access roads shall have an unobstructed vertical clearance clear-to-sky with the exception of protected tree species. Protected tree species overhanging fire access roads shall be maintained to provide a vertical clearance of 13 feet 6 inches.
8. When involved with subdivision in a city contracting fire protection with the County of Los Angeles Fire Department, Fire Department requirements for access, fire flows and hydrants are addressed during the subdivision tentative map stage.
9. Fire sprinkler systems are required in some residential and most commercial occupancies. For those occupancies not requiring fire sprinkler systems, it is strongly suggested that fire sprinkler systems be installed. This will reduce potential fire and life losses. Systems are now technically and economically feasible for residential use.
10. The development may require fire flows up to 8,000 gallons per minute at 20 pounds per square inch residual pressure for up to a four-hour duration. Final fire flows will be based on the size of buildings, its relationship to other structures, property lines and types of construction used.
11. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:
  - a) No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.

- b) No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
  - c) Additional hydrants will be required if hydrant spacing exceeds specified distances.
  - d) When cul-de-sac depth exceeds 200 feet on a commercial street, hydrants shall be required at the corner and mid-block.
  - e) A cul-de-sac shall not be more than 500 feet in length, when serving land zoned for commercial use.
12. Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs.
13. All on-site driveways/roadways shall provide a minimum unobstructed width of 28 feet, clear-to-sky. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building. The centerline of the access driveway shall be located parallel to and within 30 feet of an exterior wall on one side of the proposed structure.
14. Driveway width for non-residential developments shall be increased when any of the following conditions will exist:
- a) Provide 34 feet in-width, when parallel parking is allowed on one side of the access roadway/driveway. Preference is that such parking is not adjacent to the structure.
  - b) Provide 42 feet in-width, when parallel parking is allowed on each side of the access roadway/driveway.
  - c) Any access way less than 34 feet in-width shall be labeled "FIRE LANE" on the final recording map and final building plans.
  - d) For streets or driveways with parking restrictions: The entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with Fire Department approved signs stating "NO PARKING - FIRE LANE" in three-inch high letters. Driveway labeling is necessary to ensure access for Fire Department use.
15. All access devices and gates shall meet the following requirements:
- a) Any single gated opening used for ingress and egress shall be a minimum of 26 feet in-width, clear-to-sky.
  - b) Any divided gate opening (when each gate is used for a single direction of travel i.e., ingress or egress) shall be a minimum width of 20 feet clear-to-sky.
  - c) Gates and/or control devices shall be positioned a minimum of 50 feet from a public right-of-way and shall be provided with a turnaround having a minimum of 32 feet of turning radius. If an intercom system is used, the 50 feet shall be measured from the right-of-way to the intercom control device.
  - d) All limited access devices shall be of a type approved by the Fire Department.



- e) Gate plans shall be submitted to the Fire Department, prior to installation. These plans shall show all locations, widths and details of the proposed gates.
- 16. Disruptions to water service shall be coordinated with the County of Los Angeles Fire Department and alternate water sources shall be provided for fire protection during such disruptions.
- 17. Submit three sets of water plans to the County of Los Angeles Fire Department, Land Development Unit. The plans must show all proposed changes to the fire protection water system, such as fire hydrant locations and main sizes. The plans shall be submitted through the local water company.
- 18. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department, Land Development Unit Inspector, Nancy Rodeheffer, at (323) 890-4243 or [nrodeheffer@fire.lacounty.gov](mailto:nrodeheffer@fire.lacounty.gov).
- 19. The County of Los Angeles Fire Department, Land Development Unit appreciates the opportunity to comment on this project.

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

- 1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed in the Draft Environmental Impact Report.

**HEALTH HAZARDOUS MATERIALS DIVISION:**

- 1. The Health Hazardous Materials Division has no objection to the proposed project.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



FRANK VIDALES, ACTING CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

FV:ij



# Metro

May 24, 2012

Mr. Randal Lawson  
Executive Vice President  
Santa Monica Community College District  
1900 Pico Boulevard  
Santa Monica, CA 90405

Mr. Lawson,

Thank you for the opportunity to comment on the Notice of Preparation (NOP) and Scoping Meeting for the Santa Monica College – Malibu Campus Project. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues that are germane to our agency's statutory responsibilities in relation to the proposed project.

A Traffic Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County", Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic);
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections;
3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour; and
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

MTA looks forward to reviewing the Draft EIR. If you have any questions regarding this response, please call Scott Hartwell at 213-922-2836 or by email at hartwells@metro.net. Please send the Draft EIR to the following address:

MTA CEQA Review Coordination  
One Gateway Plaza MS 99-23-2  
Los Angeles, CA 90012-2952  
Attn: Scott Hartwell

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Hartwell", with a long horizontal flourish extending to the right.

Scott Hartwell  
CEQA Review Coordinator, Long Range Planning

Attachment

# GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

*Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."*

## D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

## D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

### D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

### D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

**If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).**

### D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

**D.5.1 Existing Traffic Conditions.** Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

**D.5.2 Selection of Horizon Year and Background Traffic Growth.** Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

## **D.6 PROPOSED PROJECT TRAFFIC GENERATION**

Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

## **D.7 TRIP DISTRIBUTION**

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

## D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

**D.8.1 Intersection Level of Service Analysis.** The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

**D.8.2 Arterial Segment Analysis.** For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

**D.8.3 Freeway Segment (Mainline) Analysis.** For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

**D.8.4 Transit Impact Review.** CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- Evidence that affected transit operators received the Notice of Preparation.
- A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both “peak hour” and “daily” refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
  - Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
  - For each time period, multiply the result by one of the following factors:
    - 3.5% of Total Person Trips Generated for most cases, except:
      - 10% primarily Residential within 1/4 mile of a CMP transit center
      - 15% primarily Commercial within 1/4 mile of a CMP transit center
      - 7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
      - 9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
      - 5% primarily Residential within 1/4 mile of a CMP transit corridor
      - 7% primarily Commercial within 1/4 mile of a CMP transit corridor
      - 0% if no fixed route transit services operate within one mile of the project

To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction’s TDM Ordinance measures, but other project specific measures.



- Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

## D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

**D.9.1 Criteria for Determining a Significant Impact.** For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ( $V/C \geq 0.02$ ), causing LOS F ( $V/C > 1.00$ ); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ( $V/C \geq 0.02$ ). The lead agency may apply a more stringent criteria if desired.

**D.9.2 Identification of Mitigation.** Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

**D.9.3 Project Contribution to Planned Regional Improvements.** If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- Any project contribution to the improvement, and
- The means by which trips generated at the site will access the regional facility.

**D.9.4 Transportation Demand Management (TDM).** If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

---

**D.10 REFERENCES**

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.



**Metro**

Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

October 22, 2014

Bonnie Blue, AICP  
City of Malibu  
23825 Stuart Ranch Road,  
Malibu, CA 90265

**RE: Santa Monica College project**

**RECEIVED**  
**OCT 28 2014**  
**PLANNING DEPT.**

Dear Ms. Blue,

Thank you for the opportunity to comment on the proposed Santa Monica College Project. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues in relation to our facilities and services that may be affected by the proposed project.

Metro bus lines operate on Civic Center Way, adjacent to the proposed project. Although the project is not expected to result in any long-term impacts on transit, the developer should be aware of the bus services that are present. Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines. (For closures that last more than six months, Metro's Stops and Zones Department will also need to be notified at 213-922-5188). Other municipal bus operators may also be impacted and should be included in construction outreach efforts.

Beyond impacts to Metro facilities and operations, LACMTA must also notify the applicant of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County", Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria

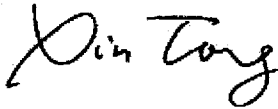
Santa Monica College project– LACMTA COMMENTS  
October 22, 2014  
Page 2

above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions regarding this response, please contact Xin Tong at 213-922-8804 or by email at tongx@metro.net. LACMTA looks forward to reviewing the Draft EIR. Please send it to the following address:

LACMTA Development Review  
One Gateway Plaza MS 99-18-3  
Los Angeles, CA 90012-2952

Sincerely,

A handwritten signature in black ink that reads "Xin Tong". The signature is written in a cursive, flowing style.

Xin Tong  
Development Review Coordinator, Countywide Planning



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • www.aqmd.gov

June 12, 2012

Randal Lawson, Executive Vice President  
Santa Monica Community College District  
1900 Pico Boulevard  
Santa Monica, CA 90405

## **Notice of Preparation of a CEQA Document for the Santa Monica College – Malibu Campus Project**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft CEQA document. Please send the SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

### **Air Quality Analysis**

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. The lead agency may wish to consider using land use emissions estimating software such as the recently released CalEEMod. This model is available on the SCAQMD Website at: <http://www.aqmd.gov/ceqa/models.html>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has developed a methodology for calculating PM<sub>2.5</sub> emissions from construction and operational activities and processes. In connection with developing PM<sub>2.5</sub> calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM<sub>2.5</sub> emissions and compare the results to the recommended PM<sub>2.5</sub> significance thresholds. Guidance for calculating PM<sub>2.5</sub> emissions and PM<sub>2.5</sub> significance thresholds can be found at the following internet address: [http://www.aqmd.gov/ceqa/handbook/PM2\\_5/PM2\\_5.html](http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html).

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the

recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment (“Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis”) can be found on the SCAQMD’s CEQA web pages at the following internet address: [http://www.aqmd.gov/ceqa/handbook/mobile\\_toxic/mobile\\_toxic.html](http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html). An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

### **Mitigation Measures**

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD’s CEQA web pages at the following internet address: [www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html) Additionally, SCAQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD’s Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/aqguide/aqguide.html>. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board’s Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB’s Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

### **Data Sources**

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD’s Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD’s World Wide Web Homepage (<http://www.aqmd.gov>).

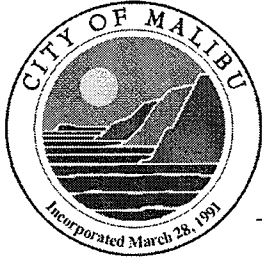
The SCAQMD staff is available to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. If you have any questions regarding this letter, please call Ian MacMillan, Program Supervisor, CEQA Section, at (909) 396-3244.

Sincerely,



Ian MacMillan  
Program Supervisor, CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

IM  
LAC120518-08  
Control Number



# City of Malibu

23825 Stuart Ranch Road · Malibu, California · 90265-4861  
Phone (310) 456-2489 · Fax (310) 456-7650 [www.malibucity.org](http://www.malibucity.org)

June 15, 2012

Mr. Randal Lawson  
Executive Vice President  
Santa Monica Community College District  
1900 Pico Boulevard  
Santa Monica, CA 90405

Reference: **Initial Study and Notice of Preparation for a Draft Environmental Impact Report**  
Santa Monica College – Malibu Campus Project  
23555 Civic Center Way, Malibu, CA

Dear Mr. Randal:

On May 17, 2012, the above-referenced documents were received by the City of Malibu Planning Department for review and comment. The subject parcel is located within the coastal zone and the City of Malibu permitting jurisdiction. Therefore, the proposed project will require a coastal development permit (CDP) issued by the City of Malibu, a responsible agency.

An application for a CDP has not been submitted to the Planning Department for the proposed project. Pursuant to Local Coastal Program (LCP) Local Implementation Plan (LIP) Section 13.6.1(A), an application for a CDP is required, including all submittal items outlined in LIP Section 13.6.4, in order to assess and evaluate the proposed project for consistency with the City's certified LCP. While construction plans for the proposed project would not be plan checked or inspected by City Building Safety staff, it is noted that the CDP will require review and conformance review by the City Geologist, City Public Works Department, City Environmental Health Administrator, and City Planning staff for conformance with LCP policies and standards. The City encourages the project team to continue close coordination with City staff on LCP and CDP requirements.

As a responsible agency, the City would review and consider the Environmental Impact Report prepared by SMCCD prior to acting on or approving the CDP and recommends that the information listed below be addressed in the Draft Environmental Impact Report (DEIR). Please note that these comments are based on the project description provided in the Initial Study and Notice of Preparation and could change as a result of a complete CDP submittal.

1) Aesthetics

- a) The DEIR should study the potential impacts from light and glare from project individually and cumulatively considering other existing and proposed development in the Civic Center. Lighting should be designed to minimize impacts on community character, nearby and upslope residential neighborhoods, and sensitive natural areas such as Legacy Park across the street.
- b) Given the proximity to parks, the analysis should consider requirements for protection of scenic resources pursuant to LIP Section 6.5. LIP Chapter 6 also calls for colors and materials to be compatible with the surrounding environment.

- 2) Biological Resources – Landscape plans should comply with LIP Section 3.10 requirements for using plants native to the Santa Monica Mountains to minimize impacts on biological resources and enhance compatibility with Legacy Park.
  
- 3) Traffic and Transportation
  - a) Traffic impacts to the following intersections should be analyzed:
    - i) Webb Way/Pacific Coast Highway (PCH)
    - ii) Cross Creek/PCH
    - iii) Cross Creek/Civic Center Way
    - iv) Civic Center Way/Webb Way
    - v) Malibu Canyon Road/PCH
    - vi) Malibu Canyon Road/Civic Center Way
    - vii) Malibu Canyon Road/Winter Canyon
    - viii) Las Flores Canyon Road/PCH
    - ix) Kanan Dume Road/PCH
    - x) Topanga Canyon Road/PCH
  - b) Current (2012) traffic counts should be used.
  - c) Cumulative impacts analysis should consider previously approved and anticipated future projects.
  - d) Any proposed traffic mitigation measures should be analyzed for feasibility and potential impacts associated with implementation, and in light of other previously approved and pending projects. Compatibility with City policies and community character should be considered.
  - e) Parking
    - i) A parking study should be performed to determine if the proposed parking is sufficient. The parking study should consider the project's conformance with LCP parking requirements, as well analyzing the project's effect on the parking conformance for the remainder of the County Civic Center property.
    - ii) Will onsite parking involve paid parking permits? If so, then it is expected the project will impact public parking on Civic Center Way.
  - f) Circulation – Impacts to pedestrian circulation should be studied. It is likely that there will be an increase in pedestrian usage from nearby shopping center areas to the new campus.
  - g) Construction management plan – a detailed construction management plan should be provided.
  
- 4) Geology and Soils – Geotechnical study should include analysis of potential for fault rupture and liquefaction hazard to the new building.
  
- 5) Hazards – The DEIR should include a detailed discussion of potential impacts to emergency access and response plans. A detailed construction management plan should be provided to ensure emergency response is not adversely affected.
  
- 6) Hydrology and Water Quality
  - a) The project will need to comply with the City's water quality mitigation and stormwater management plan requirements. A hydrology study will be required for the CDP.
  - b) The project will also be subject to the new requirements under the City's pending NPDES MS4 permit.
  - c) The project is located within a FEMA floodplain (AO Zone) and will need to be designed to meet the City's floodplain management requirements.
  
- 7) Noise – The DEIR should include a detailed study of potential noise impacts and mitigation to minimize effects on nearby and upslope residential neighborhoods, the library and Legacy Park.
  
- 8) Public Utilities
  - a) Storm drainage needs to be evaluated and all drainage should connect into Legacy Park.



- b) The DEIR needs to study the increase in water usage from the project.
  - c) The project needs to provide future sanitary sewer connections and recycled water connections.
  - d) For wastewater, the project will need to:
    - i) Demonstrate conformance with Chapter 18 of the LIP.
    - ii) Submit an engineering report documenting the capacity of the existing onsite wastewater treatment system (construction dimensions and current condition).
    - iii) Submit an engineering report that provides an analysis of the existing wastewater flow and future wastewater flow associated with the project plan.
    - iv) Submit an in-concept approval from the Los Angeles County Department of Public Health, Environmental Health Land Use Section.
    - v) Demonstrate conformance with the policies and requirements of the Los Angeles County Regional Water Quality Control Board (copies of Waste Discharge Requirements, report of substantial modification, follow-up correspondence, etc.).
    - vi) Submit the affidavit required as per the City's Policy on the Environmental Health Review for Projects within the Civic Center Area (attached).
  - e) The alternatives analysis should include the possibility of not being able to utilize the existing onsite wastewater treatment system.
- 9) Land Use
- a) Zoning conformance analysis should consider not only the project area's consistency with development standards in LIP Chapter 3, but also how the parcel will affect the consistency of the parcel overall with these standards. Changes in the project area that increase the extent of an existing nonconformity for the overall parcel would require discretionary entitlements and should be discussed in the DEIR.
  - b) Building height over 18 feet will require a site plan review approval. Visual analysis should address findings required by LIP Section 13.27.
  - c) An LCP amendment for revisions to development standards for institutional uses is currently under review and pending certification by the California Coastal Commission.
- 10) Environmental Setting – The environmental setting should identify and discuss the following onsite uses and how the project would affect them:
- a) Memorial rose garden
  - b) Farmer's market that occurs on Sundays in a leased portion of the County's Civic Center parking lot pursuant to a conditional use permit approved by the City
  - c) Tow yard
  - d) Communication tower

Thank you for the opportunity to comment. Please contact Bonnie Blue, Senior Planner, at (310) 456-2489, extension 258 or [bblue@malibucity.org](mailto:bblue@malibucity.org) with any questions.

Sincerely,



Joyce Parker-Bozylinski, AICP  
Planning Director

Attachment: Policy for Environmental Health Review of Development Projects within the Civic Center Prohibition Area

cc: Jim Thorsen, City Manager  
Victor Peterson, Environmental Sustainability Department Director  
Bob Brager, Public Works Director



# City of Malibu

## Environmental Sustainability Department

23825 Stuart Ranch Road • Malibu, California • 90265-4861  
Phone (310) 456-2489 • Fax (310) 456-7650 • [www.malibucity.org](http://www.malibucity.org)

### **POLICY FOR ENVIRONMENTAL HEALTH REVIEW OF DEVELOPMENT PROJECTS WITHIN THE CIVIC CENTER PROHIBITION AREA**

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) adopted Resolution No. R-4-2009-007, a Basin Plan Amendment to the State Water Code to “Prohibit On-Site Wastewater Disposal Systems in the Malibu Civic Center Area”. The resolution may be viewed online at [http://www.waterboards.ca.gov/losangeles/press\\_room/announcements/Public-Hearing-Malibu/Malibu\\_Final\\_Resolution\\_Docs/3.%20RESOLUTION.pdf](http://www.waterboards.ca.gov/losangeles/press_room/announcements/Public-Hearing-Malibu/Malibu_Final_Resolution_Docs/3.%20RESOLUTION.pdf). The resolution became effective on December 23, 2010. On August 23, 2011 the State Board approved a Memorandum of Understanding (MOU) with the City. The MOU establishes time frames and milestones for the City to achieve compliance with the Prohibition. The boundaries of the Malibu Civic Center Onsite Wastewater Disposal Prohibition Area are shown on Exhibit A attached.

The City policy for Environmental Health review of development projects proposed for properties located within the prohibition area is as follows.

#### **PHASE I AND PHASE II AREAS**

**VACANT LAND:** All new onsite wastewater disposal system discharges are prohibited by the Regional Board through the Basin Plan Amendment with the exception of those projects identified in table 4-zz of the adopted resolution. These projects have been deemed entitled for a new Onsite Wastewater Treatment System (OWTS) by the Regional Board. All other new development projects that include a new sanitary waste discharge through a new OWTS will be referred to the Regional Board for concurrent approval with the development review by the City. Regional Board approval for a project’s wastewater discharge must be obtained prior any development approvals or permits.

**DEVELOPED PROPERTIES:** The resolution prohibits effluent discharge from existing OWTS after November 5, 2015 for commercial properties and November 5, 2019 for residential properties. Resolution No. R-4-2009-007 states “This prohibition is not intended to prevent repairs and maintenance to existing septic/disposal systems, provided that repairs and maintenance do not expand the capacity of the system and increase flows of wastewater.” The prohibition does not allow for any new discharges, except as mentioned above those projects identified on table 4-zz. An expansion of existing development may be authorized provided the proposal does not include a new discharge of sanitary waste. For residential occupancies, any increase in the number of existing bedrooms or plumbing drainage fixture units is considered a new discharge of sanitary waste. For nonresidential occupancies, any increase in the number of drainage fixture units, or intensity of use per the Malibu Plumbing Code, either voluntary or due to code compliance, is considered a new discharge of sanitary waste. The number of pre-existing bedrooms and/or drainage fixture units shall be demonstrated by the applicant using evidence of approved construction permits, or, in cases where the permit record is unclear, by record drawings certified (wet signed and stamped) by a licensed architect or civil engineer. Existing wastewater flows shall not be increased or exceed the capacity of the existing OWTS. Projects that do not involve a new waste discharge will be reviewed utilizing the same criteria as applied to projects outside the prohibition area.

## **PHASE III AREA**

**VACANT LAND:** Same policy as for Phase I & II vacant land.

### **DEVELOPED PROPERTIES:**

Compliance with the bulleted items below shall demonstrate consistency with the Basin Plan Amendment and the protection of Public Health per the MOU.

#### **Residential**

Modification to existing residential structures may be allowed. Increases in the number of bedrooms and plumbing fixture units may be considered provided the following criteria are strictly adhered to:

- The property owner shall sign an acknowledgement stating they have read and understand the provisions of the Basin Plan Amendment and the MOU.
- All increased wastewater flows shall be limited to a maximum of 420 gallons per day or less as an estimated average residential flow. Flows shall be calculated utilizing United States Environmental Protection Agency mean daily per capita indoor use of 70 gal/persons/day. For purposes of this calculation, the first bedroom shall have a two person occupancy; each additional bedroom shall have single person occupancy. A room shall be considered a bedroom if it provides privacy and is in close proximity to a bathroom with a bathtub and/or shower fixtures.
- Existing OWTS with existing flows greater than 420 gallons per day may be considered provided the existing flow is not increased by the proposed modification.
- Any new fixtures shall be water efficient and meet current state low flow standards. Every effort to maximize water efficiency must be implemented.
- All expanded or new OWTS shall be designed to include filtration and disinfection to their existing or new OWTS in accordance with City regulations.
- All applicable City reviews, approvals, and permits must be obtained for any required OWTS alteration, repair, or replacement.

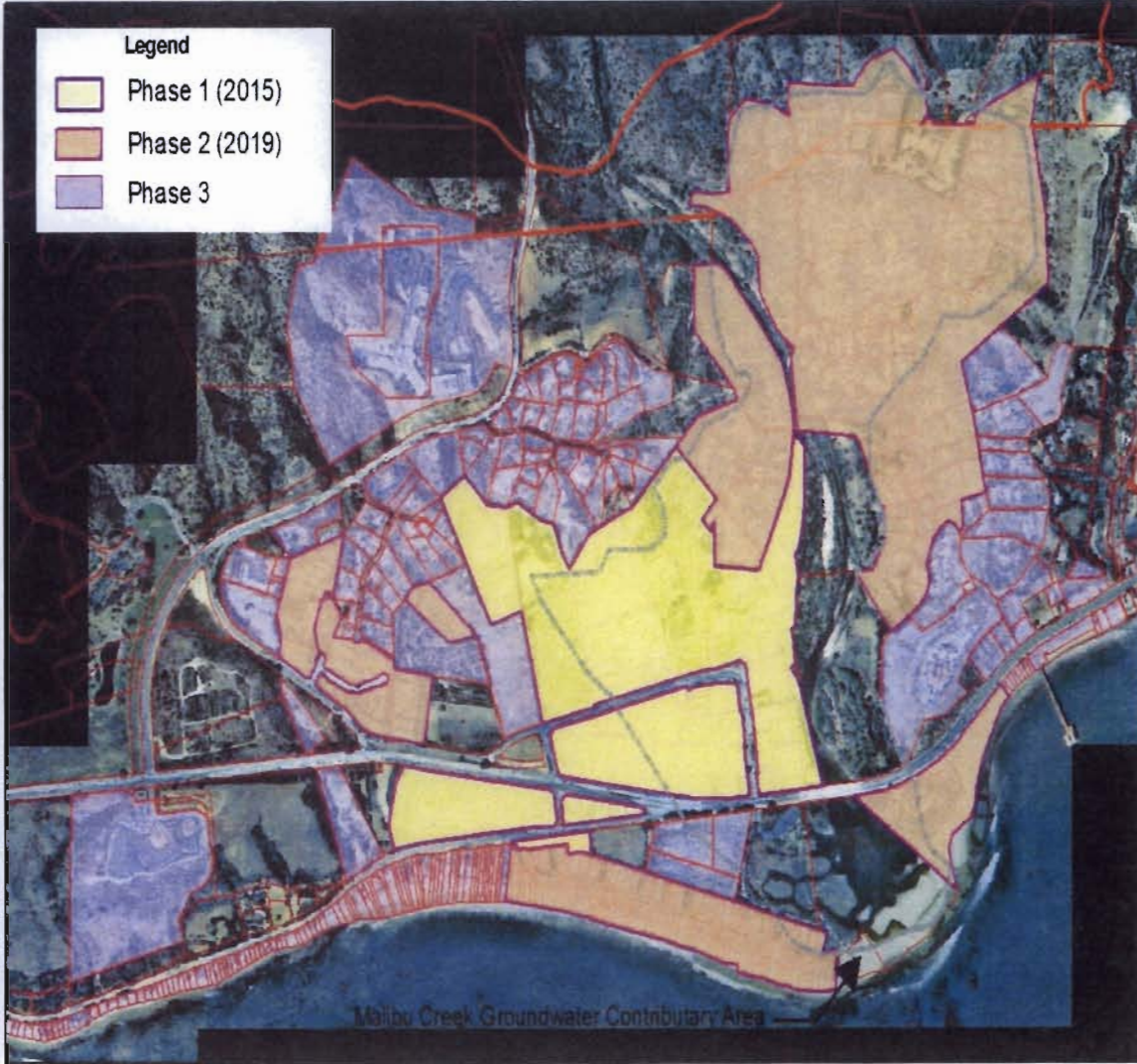
The City will consider the construction of a new replacement residential structure on a property where an existing residential structure will be demolished as an “existing residential structure”.

#### **Nonresidential**

- The property owner shall sign an acknowledgement stating they have read and understand the provisions of the Basin Plan Amendment and the MOU.
- Existing wastewater flows shall not be increased or exceed the capacity of the existing OWTS. Engineering analysis of wastewater flows pre and post modification must be provided.
- Any new fixtures must be water efficient and meet current state low flow standards. Every effort to maximize water efficiency must be implemented such as the replacement of existing fixtures with new water efficient fixtures.
- All expanded or new OWTS shall be designed to include filtration and disinfection to their existing or new OWTS in accordance with City regulations.
- All applicable City reviews, approvals, and permits must be obtained for any required OWTS alteration, repair, or replacement.

**EXHIBIT A: Boundary Map**

**Civic Center Wastewater Treatment Plan  
Phasing Options**





# City of Malibu

## Environmental Sustainability Department

23825 Stuart Ranch Road • Malibu, California • 90265-4861  
Phone (310) 456-2489 • Fax (310) 456-7650 • [www.malibucity.org](http://www.malibucity.org)

Date: \_\_\_\_\_

PROPERTY OWNER NAME - PRINT

PROPERTY ADDRESS

I/We, certify I/We are the property owner(s) of the above stated address and further attest that I/We have read and fully understand the provisions of the Water Quality Control Plan Los Angeles Region, Resolution No. R4-2009-007, a Basin Plan Amendment to prohibit On-Site Wastewater Disposal Systems in the Malibu Civic Center Area (Basin Plan Amendment), and I/We further attest that I/We have read and understand the provisions of the Memorandum of Understanding (MOU) between the City of Malibu and the Regional Water Quality Control Board, Los Angeles Region and State Water Resources Control Board regarding phased implementation of the Basin Plan Amendment prohibiting On-site Wastewater Disposal Systems in the Malibu Civic Center area (MOU). I/We further agree to abide by all requirements of both of these documents. Having read and fully understanding both documents, I/We hereby agree to hold harmless the City of Malibu for any matters relating to the Basin Plan Amendment or the MOU.

\_\_\_\_\_  
SIGNATURE

\_\_\_\_\_  
DATE

### ALL-PURPOSE ACKNOWLEDGMENT

Pursuant to Civil Code Section 1181

STATE OF CALIFORNIA        }  
County of Los Angeles       } SS

On \_\_\_\_\_, before me, Notary Public, personally appeared

\_\_\_\_\_, who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

I certify under penalty of perjury under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

\_\_\_\_\_  
(Notary Public's signature in and for said County and State)

(seal)







*July 11, 2012*

**VIA E-MAIL**

City of Malibu  
Attn: Bonnie Blue, Senior Planner  
23825 Stuart Ranch Road  
Malibu, CA 90265-4861  
[bblue@malibucity.org](mailto:bblue@malibucity.org)

**Re: Wishtoyo Foundation CEQA Public Scoping Comments for the City of Malibu's Proposed Santa Monica College - Malibu Campus Project**

Dear Mrs. Danner and to whom it may concern with the City of Malibu:

On behalf of the Wishtoyo Foundation ("Wishtoyo"), we submit the following CEQA scoping comments for the City of Malibu's Proposed Santa Monica College - Malibu Campus Project ("Project") and the Project's Environmental Impact Report ("EIR").

Wishtoyo is a non-profit organization with over 700 members composed primarily of Chumash Native Americans, Los Angeles County residents, and Ventura County residents. Wishtoyo's mission is to preserve, protect, and restore Chumash culture, the culture of all Ventura County's diverse communities, and the environment. Wishtoyo also shares traditional Chumash beliefs, cultural practices, songs, dances, stories, and value with the public to instill environmental awareness and responsibility for sustaining the health of our land, air, and water for the benefit of future generations.

Wishtoyo opposes the Santa Monica College - Malibu Campus Project due to its foreseeable impacts on Chumash Native American cultural resources, the cultural resources of Malibu residents, and the water quality and ecological conditions of Malibu's coastal waters. The Chumash cultural resources foreseeably impacted by the project include: Chumash village sites; Chumash burial sites; Chumash archeological remains, the Chumash natural cultural landscape consisting of undeveloped landscape that maintains its aesthetic and historical integrity, and Chumash natural cultural resources such as native plants, native wildlife, and marine life that have important religious and cultural significance to the Chumash Peoples.

Wishtoyo thus requests that the Project is not undertaken by the City. However, if the Project does proceed, Wishtoyo insists that all cultural and environmental impacts are mitigated to a less than significant impact. To best ensure Chumash Native American cultural resources impacted by the Project are identified, and that the Project's impacts to Chumash cultural resources are satisfactorily mitigated to a less than significant effect as determined and informed by Chumash Peoples, if the project does proceed, Wishtoyo requests that extensive review of the Project's impacts to Chumash Peoples is conducted. This review of the Project's impacts to Chumash Peoples must include consultation with Chumash and Wishtoyo throughout every stage of the EIR process as required by CEQA, including during the archeological and cultural impact studies and surveys, and during the selection of mitigation measures.

Thank you for your time and consideration in reviewing our concerns and requests. Please feel free to contact us with any questions.

Sincerely,



Mati Waiya  
Chumash Ceremonial Elder  
Executive Director, Wishtoyo Foundation



Luhui Isha  
Cultural Resources & Education Director  
Wishtoyo Foundation



Jason Weiner  
Staff Attorney  
Wishtoyo Foundation

cc: Lisa Pope, City Clerk, [lpope@malibucity.org](mailto:lpope@malibucity.org)  
Desiree Jimenez, Deputy City Clerk, [djimenez@malibucity.org](mailto:djimenez@malibucity.org)

**From:** Sally Benjamin [mailto:5pennies\_benjamin@earthlink.net]  
**Sent:** Saturday, June 16, 2012 11:54 AM  
**To:** jparkerbozylinski@malibucity.org; jthorsen@ci.malibu.ca.us;  
LAWSON\_RANDAL  
**Cc:** executiveoffice@bos.lacounty.gov  
**Subject:** Santa Monica Community College Scoping comments  
**Importance:** High

June 16, 2012,

Dear Mr. Lawson, Ms. Parker-Bozylinski, and Mr. Thorsen,

I am a local resident here in Malibu. My property (3216 Colony View Circle) is directly above the proposed site for the Santa Monica Community College extension. It is being proposed in the LA County property for the Sheriff station which is now vacant. Please find my comments attached to this e-mail.

I also have 2 additional; comments/ concerns to make on this project which are not included in this document. I have already mailed the document to Mr. Lawson and do not want to change a copy he will be receiving. Therefore, I will present them here.

For the sake of responding to all of my comments (in my letter and this e-mail) the 2 comments below would be number 11 & number 12 respectfully. I have number them as such.

11. There is a tow yard on the property which is an important service for such a remote location as Malibu. This is a very important service to be maintained within Malibu due to its remoteness. If this service is displaced outside of Malibu, where are cars taken to when removed from PCH after a traffic accident? How long will it take the service to return into Malibu if relocated in a location on the other side of the hill? The EIR needs to address the issue of relocating the tow yard.

12. There also is a temporary day labor area where Malibu residents obtain day workers. That area is located on the proposed property as well. This services is utilized by the Malibu citizens and is equally as important. Where is that being relocated to? The EIR needs to address this issue as well.

Since these items address relocation of services on the proposed site I suggest you use "relocation of services" in the EIR.



Thank you for your time and consideration regarding my concerns for this project.

Regards,

Sally Benjamin  
3216 Colony View Circle  
Malibu, CA

June 17, 2012

Mr. Randal Lawson, Executive Vice President  
Santa Monica Community College District  
1900 Pico Boulevard  
Santa Monica, CA 90405

Dear Mr. Lawson,

I am writing to you concerning the proposed Santa Monica College - Malibu Campus. I am a local resident who lives directly above your proposed site. My address is 3216 Colony View Circle. Below are a few of my concerns for this project.

- 1. The square footage for the proposed project (27,500 sq. ft) exceeds the square footage allowed in Measure S passed November 2, 2004.** Measure S states, in material distributed for voters to read and understand Measure S, "site acquisition and improvements in Malibu for instructional facility of **no more than 25,000 assignable square feet and field space.**"<sup>1</sup> This proposal building is 27,500 for educational facility including a 5,700 square feet Community Sheriff Substation. This is 2,500 sq. ft over what the voters approved in 2004.

The voters voted to build an educational building not to exceed 25,000 sq ft. This is now a mixed use building; part of the building will be used by the LA County of Sheriffs. Can school bond money be used in this manner? Will the Sheriff Department pay rent to the SMCC? Will the Sheriff's Department pay for their share of the building of this project? Will the Sheriff's department pay their or some share of the utilities, sewer assessment, and property taxes?

What is the length of time the Sheriff's Department has committed to being in and using this building? Does SMCC have the right to remove them from the premises for their use without discussion with the City of Malibu? The Malibu citizens understand that this would allow the Sheriff to have a much needed presence in Malibu. This wouldn't be the case if SMCC grows and needs the space in the future and evicts the Sheriff's Department for their own growth.

- 2. The square footage of the project exceeds the County of Los Angeles Lease agreement.** Santa Monica Community College District Board of Trustees on October 4, 2011 was updated on the status of LA County property in Malibu Center. In that presentation it states that "April 19, 2011 the County of Los Angeles Board of Supervisors approved a request of the Chief Executive to negotiate the 25-year lease with the District (with 14 five-year options to renew) of approximately 128,500 square feet of land at the Malibu Civic Center at 23555 Civic Center Way for construction of an educational facility of approximately 20,000 square feet". Under the County agreement the SMMC proposal is 2,500 square feet over (27,500 minus 25,000sq. ft. bond allowance). While one might say the above word "approximate" covers the 1,800 the square foot overage. The facts here say otherwise. The presentation on October 4 states 5,700 square feet for the Sheriff substation, which is exactly what is in the proposed project. Also at that presentation the approximately 128,500 square feet of land to be leased at Malibu Civic Center is exactly what is discussed in the SMCC Malibu proposal. The proposal is 1,800 sq. ft. over the agreement with the County of Los Angeles.

Los Angeles County understands that the bond for Measure S is for a 25,000 sq. foot building in their issuance of their lease to

SMCC. A 25,000 sq. ft building is to be built, the County would like 5,700 sq. ft. of that structure to be a Sheriff substation. That leaves 19,300 sq. ft. for an institutional structure. The usage of the word approximate would be correct when saying “approximately 20,000 sq. ft. as it is 700 sq. ft. from 20,000.

The calculation within the proposal based on FAR becomes mute due to the constraints of the square footage allowed by the bond. The bond allows 25,000 square foot of building. Another constraint on the property will be the disposal of waste water which also makes the FAR discussion in the proposal mute.

- 3. The recreational space isn't included in the square footage calculation of the facility and it should.** Within the proposal there is discussion about an outdoor recreational space where outdoor educational activities would occur. The proposal does not define a square footage for this space, it should. Nor can one find it in the discussion with the LA County on the lease of the property. The plans for this space are to be used for classroom activities and public event/activity space. The Measure S allows for the acquisition of field space; not stating the size of such space. SMCC has all intentions of using the space for educational purposes therefore it should be included in the square footage calculation. The square footage of the instructional facility proposal is actually bigger than what is being stated. It is the building PLUS the field space (lawn area) planning to be used for educational purposes.
- 4. The proposal isn't congruent with the LA County lease agreement regarding public usage.** The proposal states that some classrooms will be available for a fee; the flexible art studio, the 100 seat lecture hall (for small events) and the recreational space (community events). In agreement with the

County of LA lease agreement and information given to the Board of Trustee SMCC District on October 4, 2011 states "the property will be restricted for the use only for public educational and /or governmental purposes compatible with existing Civic Center uses and such other purposes as are approved by the County." The proposal is suggesting to the public they will be able to utilize the facility (for a fee) and yet the LA County lease clearly has restrictions on its usage.

Nowhere in the LA County lease agreement does it mention a usage fee to be paid by the public and yet within the SMCC proposal the public will have to pay fees to use the classrooms.

While Emeritus classes were discussed at the meeting, staff members were not able to articulate what would be available to the public and if classrooms would be available for meetings by the public. There is a need within Malibu for meeting space of various groups. What does LA County means by "restricted use only for public educations and/or governmental purposes? Who and what type of groups can use the facilities? What are the fees that SMCC intends to collect? Does LA County know about the fees and agree with the arrangement?

- 5. Parking around the Helipad blocks access by emergency vehicles; ambulance, paramedics, fire trucks.** At the present time there are no parking spaces next to the Helipad. In the proposal there are 5 parking spaces in the front of the helipad. When a helicopter arrives there are ambulances, sheriff cars, paramedics staged with individual (s) who are in need of emergency medical transportation. With the current proposal the emergency personnel and vehicles will not be able to get to and around the helicopter pad in an efficient manner when the event occurs during classroom hours. Discussion with

emergency personnel (fire, ambulances and Sheriff) on access needs to occur.

**6. Noise abatement when the institutional facility exists, during construction and demolition should be included in an EIR.**

SMCC must remember at the proposed location they are in a valley (lower ground), with hills surrounding it. Sound travels up and out in a wave form. Construction, demolition, outdoor activities and parking lot noise will be heard at my home and many others in the area. Hours on construction will conform to City code. People talking out in the parking lot, proposed classes or sports out in the lawn area (field space) will be all heard at the homes above this property. SMCC should also meet with the home owners on the hills to discuss noise levels, traffic and lights.

**7. Traffic projections and traffic light sequencing should be calculated for the school as well as the cumulative amount which will occur from all of the development with the Civic Center.** Due to the wastewater treatment plant to be built, much currently undeveloped land is being developed which will bring additional traffic to a confined area. SMCC is only one project planned for this area which will bring additional cars, smog, and congestion. While SMCC talks about serving Malibu students and citizens, it is clear from the discussion and the proposal SMCC intends to draw student from outside of Malibu to this facility. SMCC needs to project the number of student from Malibu and in the valley; Agoura, Calabasas, Woodland Hills, Thousand Oaks, Simi Valley, and Moore Park etc. SMCC should be able to review where student are traveling from to attend SMCC (Santa Monica Campus). The calculations should be based on current numbers of Malibu students and valley student at SMCC not statistics when a campus existed in Malibu back in 1970 and 1980's. Additional information and

plans should be provided in mitigating the number of cars brought into the area. Like local area buses from the Valley, Santa Monica and western part of Malibu.

**8. Parking appears to be insufficient for the proposal at hand.**

The presenters at the EIR May 17, 2012 were not able to comment on the parking needs of the sheriff and did say there wasn't any parking allowed for them. As a substation they need parking period! Sheriff's drive vehicles and will need a place to park them when using the building and for public use related to sheriff needs. Work with the County Sheriff to determine the number of parking spaces needed.

The discussion of attendance at the scoping meeting in May 2012 and the proposal don't agree. The proposal states 210 student, at the scoping meeting it was 300 -500 students. Student population affects traffic and parking needs. Parking at this site if limited; it is misleading to the public and the City when parking needs are not clearly evaluated. This project has necessary parking and flexible parking. Each should be used to determine parking needs for this project as well as traffic impact.

**Necessary Parking**

**Sheriff:**

- Administrative staff
- Sheriff extra car
- Some number of Sheriff's in building working

**SMCC:**

- Administrative staff (proposal states 12 FTE)

**Flexible Parking**

Sheriff:

- Public using the Sheriff facilities
- Variable number of Sheriff's in the building

SMCC :

- It the classroom total capacity
- Student enrollment projects from Malibu & commuting to this facility.

- 9. Lights and lighting effects in the area should also be part of the EIR.** Since this area isn't developed, there is allot of wildlife; coyotes, raccoons, possum, hawks and many are nocturnal animals (active at night). Lighting will affect their habitats and the enjoyment the citizens have with them. Night lights for parking lots will take away our night black skies. Lights will affect the neighbors! This items needs to be included in the EIR.
- 10. SMCC ability to pay higher property taxes in the future due to the sewer assessment.** The State of CA is under great economic strain as it can't balance the budget, there are shortfalls everywhere. There will be no quick fix for this budget problem; this deficit will be with the State for many years. The wastewater treatment facility being proposed for the Civic Center area doesn't have an exact price tag at the moment. \$50 million dollars is being tossed around just to build the facility (one needs to think of that cost increasing in the future). This figure doesn't include the EIR fees and other costs the City has already incurred which will be added to the assessment. The property owners (that would be SMCC in this case) pay for their own connection to the sewer line and all future maintenance of the line on the owner's property. SMCC is responsible for upgrading the sewer lines for the other County



properties on this site how will the sewer assessment be allocated to SMCC and the Sheriff substation and the other County properties? Where are the funds coming from for SMCC pay for the additional sewer assessment fees to be placed on this property in the future?

I want to thank you for your time and careful considerations of the stated concerns.

Sincerely,

Sally Benjamin

1. <http://www.smartvoter.org/2004/11/02/ca/la/meas/S/>

JUN 18 2012

*From the Desk of Joan C. Lavine*

Attorney at Law  
9000 Sunset Blvd., Suite 1001  
Los Angeles, California 90069, U.S.A.  
Office Phones: (213)627-3241; (310)652-2532  
Fax Phone: (310)273-4924  
E-mail address: [JCLavine@aol.com](mailto:JCLavine@aol.com); [ADove@aol.com](mailto:ADove@aol.com)

June 16, 2012

Re: Scoping and preparation of Environmental Impact Report on construction of Santa Monica Community College satellite Malibu campus at the Los Angeles County courthouse at 23525 Civic Center Way

Mr. Randal Lawson  
Executive Vice President, Business and Administration  
Santa Monica Community College District  
1900 Pico Blvd.  
Santa Monica, Ca. 90405  
Phone: 310-434-4360 x4360

Dear Mr. Lawson:

I oppose the pending SMCCD Malibu satellite campus proposal. I urge you to drop those plans.

Your District's proposal, if implemented, would significantly interfere with our established, essential Los Angeles Superior Court branch, our newly remodeled, very popular County Public Library and Malibu Labor Exchange services in operation at the Los Angeles County Malibu Civic Center facility at 23525 Civic Center Way. The County facility redevelopment to install an SMCC satellite campus in Malibu would significantly impair the ease of access to current core government and public services, the courts and a public library, so that they would be reachable only with great difficulty.

The current uses of that Malibu Civic Center county facility, each essential to the functioning of our community, are:

1. The Los Angeles Superior Court's Malibu Branch occupies a substantial portion of the facility.

6/16/2012 12:37 PM

2. The newly remodeled, upgrade Los Angeles County Public Library, just opened on April 28, 2012, has expanded its services at the easterly side and is hugely popular.
3. The Los Angeles County Waterworks for District 29 has offices in the structure.
4. The Malibu Labor Exchange which provides valuable day labor and housekeeper workers operates from the west area.
5. The Malibu Towing operates from the back portion.
6. The parking lot hosts weekend events, such as a farmers' market and art shows.

The published scoping diagram for the SMCCD Malibu Civic Center campus proposes to eliminate half of approximately 150 present parking spaces for the court public parking in the County parking lot, proposes to eliminate the availability of the westerly area where the Malibu Labor Exchange is located, and proposes to eliminate the availability of the Malibu Towing operation.

On workday mornings, the County's parking lot is substantially filled with those attending court proceedings. While jury trials, traffic trials and small claims trials are going on, the courthouse parking lot is generally full and overflow parking out on the street is frequently required. The parking is free so that those with limited funds are not burdened with exorbitant parking fees, and is safe and convenient. I estimate 150 general parking space are available in that lot.

The Los Angeles County Public Library system just opened, on April 28, 2012, a remodeled, updated public library located at the east side of the proposed redevelopment county facility. Over a thousand people turned out for its opening that April Sunday. We have fought for eight years for a real public library in Malibu. Your proposal is to remove half the otherwise usable parking areas necessary for Malibu library users to have access to it. In addition, the construction activities would damage the newly remodeled, redecorated library with all the construction dust, debris, demolition. New computer equipment is subject to being damaged. Parking for access would be lost.

We humans are part of the environment, aren't we? The relevant documents I have been able to locate largely ignore the significant adverse impacts on residents, residential property owners, and recreational users in the Malibu Civic Center. Also omitted from the proposal is any mention of the yearly influx into the Malibu Civic Center of well in excess of a million beach-goers and public park users each year.

The preferences and needs of locals and visitors have been marginalized and dismissed as irrelevant. A vote of your constituents is called for.

Consider the cumulative impact of this and FIVE OTHER large commercial and residential projects that are proposed and in the planning stages, simultaneously being built. Review their (draft) EIRs. The paperwork for the La Paz/Whole Foods project states that a six lane roadway is necessary to accommodate it at one point on Civic Center Way. See the attached excerpts from the La Paz Final EIR (SCH No. 2003011131). Consider the up to 250 SMCCD students and faculty being added to traffic in the Civic Center and on Civic Center Way, along with hundreds of shoppers daily at the proposed Whole Foods Market needing 527 parking spaces on Civic Center Way, perhaps several hundred people a day added from a hotel at PCH, Pepperdine's construction of a game forum across PCH from the Crummer Site, and proposed mansion-sized homes at PCH and Malibu Canyon. Gridlock on PCH most of each day appears to be a likely outcome.

Are adequate water supplies and delivery are available? My understanding is the water delivery capacity has been exceeded and that the Malibu area water utility, Los Angeles County Waterworks, cannot take on additional substantial water users.

Is waste disposal available, and how it will be dealt with? I consider the remark in the scoping statement that a municipal disposal system is "planned" to be misleading and incorrect. I believe the LA County facility on Civic Drive is subject to an on-site wastewater ban effective in 2015. OWTS is the only current form of wastewater management generally in use and available at this time.

SMCCD officials at the Malibu campus scoping meeting on May 31, 2012, stated they wanted to bring back the SMCCD educational programs of the 1970's and 1980's. Do the constituents of the Santa Monica Community College District in Malibu seek a satellite Malibu campus or increased educational programs in Malibu? Since the 1980's, Pepperdine University has been built. We have a new County Public Library. We have a theater at the west end of Malibu.

I suggest that preferable and environmentally friendly alternatives for unoccupied space in the County building in the Civic Center should provide important, necessary services. An LA County Sheriff's sub-station would be an appropriate and helpful addition—that is the only part of the SMCCD proposal I endorse. The U.S. Postal Service needs facilities, and its officials might be interested. The USPS would provide essential public services to the Malibu community. These potential tenants would be low adverse environmental impact, would not disturb the rural ambience and would contribute to the support of the community.

Does investing \$25 million in building a satellite campus while SMCCD ratchets up student fees and drops courses and instructors meet its core mission of

being a community college? I view this proposal as doing just the opposite--catering to the affluent. Instead, use your ample resources for ~~what~~ the Santa Monica-Malibu communities and young people seeking affordable, pragmatic educational opportunities that will train young people to have saleable, employable skills and that are needed: A world-class nursing education program. Pre-engineering and relating technical training. Ever-expanding high tech and entertainment industry careers both in front of and behind the cameras.

SMCCD officials' failure to provide adequate, reasonable notice of the EIR proceedings to those potentially adversely affected is highly objectionable. There has been a general failure to mail notice to property owners and occupants throughout Malibu of the EIR scoping proceedings, of comment and objection deadlines and of officials' identities and means of reaching them with whom they can communicate their concerns and comments. No contact person or e-mail address is listed in the online document I found or the information sheet I was given at City of Malibu Planning. The listed website URL does not access the EIR documents, except for a two page flyer.

I request notice of the draft EIR and of all subsequent proceedings and notices regarding this construction project. Please serve me by the U.S. Mails and/or e-mail at the above addresses.

Thank you.

Very truly yours,



Joan Lavine

Owner of residential property on Malibu Road within the Malibu Civic Center  
California State Bar No. 048169

Encl.: La Paz/Soboroff EIR report, Transportation Section, pages 1, 2, 26-29

CC: Los Angeles County Public Library Chief Librarian, Margaret Donnellan Todd,  
[mdtodd@library.lacounty.gov](mailto:mdtodd@library.lacounty.gov).

CC: Hon. Lawrence Mira, Presiding Judge, Los Angeles Superior Court, Malibu  
Branch, 23525 Civic Center Way, Malibu, Ca. 90265

CC: Los Angeles County Counsel John Krattli  
Los Angeles County Counsel's Office  
Hall of Administration, L.A. Co.  
500 West Temple Street, Room 648  
Los Angeles, Ca. 90012; Office: (213) 974-1811; fax 213-626-7446

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## V. ENVIRONMENTAL IMPACT ANALYSIS

### K. TRANSPORTATION AND CIRCULATION

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#### ENVIRONMENTAL SETTING

The following section is based on the *Draft Traffic Circulation Study for the Malibu La Paz Project* (Traffic Study), prepared by Kaku Associates, December 2004. The Traffic Study is contained in Appendix D to this EIR. In response to comments received on the Draft EIR, supplemental traffic count data were taken and an analysis of potential traffic impacts from additional alternatives to the Proposed Project was prepared by Priority Engineering, Inc. These data and analyses are contained in Appendix J. The scope of analysis for these studies ~~y~~was~~were~~ developed in conjunction with the City of Malibu. The base assumptions, technical methodologies, and geographic coverage of the studies ~~y~~were all identified as part of the study approach.

The Traffic Study analyzes potential project-generated traffic impacts on the street system based on assumed completion of the Proposed Project in 2007. The study includes an analysis of the following traffic scenarios:

Existing Conditions (2004) - The analysis of existing traffic conditions intends to provide a basis for the remainder of the study. The existing conditions analysis includes an assessment of streets and highways, traffic volumes, and operating conditions.

Cumulative Base Conditions (2007) - Future traffic conditions without the Proposed Project are projected for the year 2007. This analysis forecasts future traffic growth and estimates operating conditions that would be expected without the addition of project traffic by the year 2007.

Cumulative Plus Project Conditions (2007) - Traffic expected to be generated by the Proposed Project is added to the Cumulative Base traffic forecasts. These traffic projections are used to identify potential impacts of the operating conditions in the year 2007.

#### Existing Street System

A comprehensive data collection effort was undertaken to develop a detailed description of existing conditions within the study area. The assessment of conditions relevant to this study includes an inventory of the street system, the traffic volumes on these facilities, operating conditions at key intersections, and the current transit services in the study area.

The City of Malibu identified the following intersections to be analyzed for each of the scenarios described above:

1. Kanan Dume Road & Pacific Coast Highway (PCH)
2. Malibu Canyon Road & PCH

3. Webb Way & PCH
4. Cross Creek Road & PCH
5. Las Flores Canyon Road & PCH
6. Topanga Canyon Boulevard & PCH
7. Malibu Canyon Road & Civic Center Way
8. Webb Way & Civic Center Way
9. Cross Creek Road & Civic Center Way

Figure V.K-1 illustrates the locations of the nine analyzed intersections. As shown, the major roadways intersecting PCH are included in the study area in addition to the intersections adjacent to the Project Site. The City also requested a weekday two-lane roadway analysis of Malibu Canyon Road, between the Hughes Research Lab and Piuma Road (north of the Civic Center area).

PCH provides the primary regional access to the Project Site. The following briefly describes the major streets serving the project study area:

Pacific Coast Highway (PCH) - PCH is a state route (SR-1) that travels in an east-west direction adjacent to the Project Site. PCH provides four travel lanes in the vicinity of the Project Site. PCH, traveling east to Santa Monica, becomes the Santa Monica Freeway (I-10) and provides service to the Los Angeles area. The average daily traffic on PCH ranges from 68,000 vehicles at the junction east of Topanga Canyon to 27,500 vehicles at the junction west of Trancas Canyon Road, with 50,000 vehicles between Cross Creek Road and Webb Way.<sup>1</sup> The posted speed limit is between 45 and 55 miles per hour. PCH is a designated route in Los Angeles County's Congestion Management Plan (CMP).

Kanan Dume Road - Kanan Dume Road is a north-south road that provides two travel lanes within the City of Malibu and four travel lanes north of the City limits, up to the Ventura Freeway. Kanan Dume Road provides regional access from the Santa Monica Mountain area to the Malibu area. The speed limit is generally 50 miles per hour.

Malibu Canyon Road - Malibu Canyon Road is a north-south road that generally provides two travel lanes across the Santa Monica Mountains and becomes Las Virgenes Road near Mulholland Highway. Malibu Canyon Road provides four travel lanes between Civic Center Way and PCH. On the weekdays during the morning peak period from 6 a.m. to 9 a.m., southbound left-turns from Malibu Canyon Road to Civic Center Way are prohibited in order to limit "Z" traffic through the Civic Center area. The posted speed limit is 45 miles per hour.

Webb Way - Webb Way is a north-south road that provides two travel lanes between Civic Center Way and Malibu Road. Webb Way provides access to the Malibu Civic Center and the Malibu Colony area.

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<sup>1</sup> Caltrans, 2003.

### ***CMP Significant Traffic Impact Criteria***

The LACMTA has established CMP TIA significance criteria indicating that a significant impact occurs when the Proposed Project's traffic increases demand at a CMP freeway facility or arterial monitoring location by two percent of capacity (i.e., V/C increase  $\geq 0.02$ ), causing the location to operate at LOS F (V/C > 1.00). Under this criterion, a project would not be considered to have a significant impact if the analyzed facility is operating at LOS E or better after the addition of project traffic. If the facility is operating at LOS F with project traffic, however, and the incremental change in the V/C ratio caused by the project is 0.02 or greater, the project would be considered to have a significant impact.

The arterial intersection levels of service (LOS) were determined using standards established by the LACMTA indicating that the volume-to-capacity (V/C) ratio should be computed using a capacity of 1,600 per intersection plus 0.10 for vehicle clearance as well as the LOS definitions provided in Table V.K-1.

### ***CMP Arterial Intersection Analysis***

The Cumulative Plus Project weekday scenario was used to conduct the CMP arterial analysis. The results of the CMP impact analysis summarized in Table V.K-11 indicate that the Proposed Project would not have a significant impact at any of the CMP arterial intersections analyzed.

**Table V.K-11  
CMP Arterial Intersection Analysis**

Intersection	Peak Hour	Cumulative Base		Cumulative Plus Proposed Project			
		V/C or Delay	LOS	V/C or Delay	LOS	Project Increase in V/C or Delay	Significant Project Impact
1. Kanan Dume Rd & PCH	AM	0.557	A	0.561	A	0.004	NO
	PM	0.632	B	0.646	B	0.014	NO
2. Malibu Cny Rd & PCH	AM	0.841	D	0.864	D	0.023	NO
	PM	0.929	E	0.953	E	0.024	NO
5. Las Flores Cny Rd & PCH	AM	0.685	B	0.689	B	0.004	NO
	PM	0.873	D	0.890	D	0.017	NO
6. Topanga Cny Blvd. & PCH	AM	1.029	F	1.030	F	0.001	NO
	PM	0.942	E	0.948	E	0.006	NO

*Source: Kaku Associates, December 2004.*

### **Parking**

The Proposed Project would include approximately 609 parking spaces, which includes 346 spaces within Parcel A, 197 spaces on Parcel B, and 66 spaces on Parcel C. The number of parking spaces proposed is consistent with the minimum number of parking spaces required by the zoning code. Therefore, the



Proposed Project would satisfy the zoning code and parking impacts would be less than significant. (For a detailed discussion of the zoning code parking requirements, see Section V.G, Land Use).

## **CUMULATIVE IMPACTS**

The analysis of traffic impacts considers the effects of both background growth in the region as well as the project growth with respect to related projects in the area. Consequently, impacts of cumulative growth are already incorporated into the traffic model. In the absence of the Proposed Project, conditions at study intersections would decline in the level of service. The morning peak period would result in an LOS D or worse at two of the nine intersections during the morning peak hour (Malibu Canyon Road & PCH and Topanga Canyon Boulevard & PCH). One of these intersections is already operating at LOS D or worse during the morning peak period (Topanga Canyon Boulevard & PCH). The afternoon peak period would result in an LOS D or worse at seven of the nine analyzed intersections (Malibu Canyon Road & PCH, Webb Way & PCH, Cross Creek Road & PCH, Las Flores Canyon Road & PCH, Topanga Canyon Boulevard & PCH, Malibu Canyon Road & Civic Center Way, and Webb Way & Civic Center Way). Four of these intersections are already operating at LOS D or worse conditions during the afternoon peak period (Malibu Canyon Road & PCH, Webb Way & PCH, Cross Creek Road & PCH, and Topanga Canyon Boulevard & PCH).

Cumulative impacts to traffic around the project area, including both the Proposed Project and related projects, are expected to be significant at five of the nine intersections analyzed prior to mitigation measure implementation. Mitigation measures for future projects which contribute to cumulative traffic growth at the study intersections shall be implemented by all related projects in coordination with the appropriate agency.

## **MITIGATION MEASURES**

Mitigation measures have been identified for each of the intersections potentially impacted by the addition of project traffic from the Proposed Project. The development of mitigation measures was limited to those that were considered physically feasible, and could be implemented without the acquisition of additional right-of-way. The following improvements satisfy these criteria and are proposed as measures to mitigate the potential project impacts identified above:

1. Webb Way & PCH - Mitigating project impacts at the intersection of Webb Way & PCH would entail re-striping/widening Webb Way between PCH and Civic Center Way to provide a six-lane cross-section with three lanes in each direction. The northbound departure currently provides two travel lanes and widening along the east side of Webb Way north of PCH would be necessary to accommodate the additional northbound lane. The widening of Webb Way to provide a six-lane cross-section would increase the storage capacity on Webb Way in an effort to minimize the potential for overflow conditions.

The addition of dual left turn lanes to the eastbound approach on PCH is also recommended; this would entail narrowing the raised center median. The existing travel lanes on PCH at this

intersection are substandard (i.e., less than 12 feet wide). This mitigation can fit within the existing traveled way with substandard lane widths (less than 12 feet); the resulting lane configuration would consist of a raised median, an 11- and 10-foot left turn lane, one 11-foot through lane, two 10-foot through lanes, and one 11-foot right-turn lane. Shifting the east and west legs of the intersection (approach and departure) several feet to the north would allow the standard width lanes with this mitigation.

Additionally, a guide sign shall be posted facing the eastbound dual left turns from PCH onto Webb Way, so that motorists who wish to make a subsequent right turn onto east bound Civic Center Way would be directed to the "Number 2" left turn lane. The sign may have to be mounted overhead.

2. Cross Creek Road & PCH - The impact of project traffic on the intersection of Cross Creek Road & PCH could be mitigated by the addition of a right-turn lane westbound on PCH. This mitigation would improve the traffic movement along westbound PCH.

Sufficient right-of-way exists on PCH to accommodate the proposed westbound right-turn lane at Cross Creek Road. The existing roadway, however, is not centered within the existing right-of-way. In order to implement a new westbound right-turn lane at this location, the roadway centerline must be shifted to the south as PCH passes through the Cross Creek Road intersection. The mitigation would result in the loss of approximately 12 on-street parking spaces on the shoulder of the south side of PCH west of Cross Creek Road. It would also result in a substandard 11-foot left-turn lane on PCH east of Cross Creek Road, which would require Caltrans approval. If Caltrans does not approve of non-standard narrower lane widths, then roadway widening on the south side of PCH on the approach and departure legs would allow the standard width lanes for this mitigation measure.

3. Webb Way & Civic Center Way – Mitigating the project impact would entail installing a new traffic signal and widening Webb Way to a six-lane cross section south of the intersection of Civic Center Way. The northbound approach and the eastbound approach would each be re-striped to include one left-turn lane, one through lane, and one right-turn lane. The southbound approach would be widened to provide one left-turn lane and one shared through/right lane. Widening the east side of Webb Way between PCH and Civic Center Way would be necessary for the proposed six-lane cross section. Results of this signal warrant are provided in the project traffic study (see Appendix G).

No feasible mitigation measures have been identified for the following intersections and road segments:

#### *Intersections*

- Malibu Canyon Road & PCH - No feasible mitigation has been identified for this intersection. Because PCH is currently built-out, no physical improvements can be implemented without acquiring additional right-of-way. Due to physical constraints, no feasible mitigation measures

were identified for Malibu Canyon Road. For these reasons, no mitigation measures have been identified as feasible.

- Cross Creek Road & Civic Center Way – No feasible mitigation was identified for this intersection. While a physically feasible mitigation is possible for this intersection, there are overriding considerations preventing physical mitigations. The Malibu City Council adopted the Cross Creek Road Improvement Project in September 2004, under which the intersection of Cross Creek Road will be stop-controlled and narrowed to a single lane on all approaches. Providing additional traffic capacity at this intersection is considered to be undesirable by the City Council.

#### *Roadway Segments*

- Malibu Canyon Road between the Hughes Research Lab and Piuma Road – No feasible mitigation has been identified for this roadway. This two-lane segment of Malibu Canyon Road is designated as a major highway on the Los Angeles County Master Plan of Highways, with a standard 100-foot right-of-way. The actual right-of-way on this segment of Malibu Canyon Road is predominantly 80 feet. Because the roadway is located on the wall of a steep canyon between Malibu Creek and the adjacent mountainside, physical conditions in this area limit the potential for capacity enhancements (i.e., widening to four lanes). For these reasons, no feasible mitigation measures have been identified.

### **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

The results of the analysis presented in Table V.K-9 indicates that the identified feasible mitigation improvements would mitigate project impacts at three of the five intersection locations identified in the analysis for the weekday cumulative plus project conditions. These intersections include: Webb Way and PCH, Cross Creek Road and PCH, and Webb Way and Civic Center Way. Significant and unavoidable traffic impacts would still remain at the following two intersection locations: (1) Malibu Canyon Road & PCH during the weekday a.m. and p.m. periods, and (2) Cross Creek Road and Civic Center Way during the weekday p.m. period.

As indicated in Table V.K-10, the proposed mitigation measures would also be effective in mitigating the significant impacts at the intersections of Webb Way at PCH and Cross Creek Road at PCH during the Saturday midday cumulative plus project conditions.

No feasible mitigation measures are available for the roadway segment of Malibu Canyon Road between the Hughes Research Lab and Piuma Road. Therefore, the impacts to this roadway segment would remain significant and unavoidable.

In the event the project is approved despite the significant and unavoidable traffic impacts identified above, a statement of overriding considerations will be required to be adopted by the decision makers.

Steve Uhring  
23722 Harbor Vista Drive  
Malibu, Calif. 90265

June 17, 2012

Mr. Randal Lawson, Executive Vice President  
Santa Monica Community College District  
1900 Pico Boulevard  
Santa Monica, CA 90405

Dear Mr. Lawson,

The following questions/comments are submitted to be considered for the EIR being completed for the proposed Santa Monica College Malibu Campus.

- 1) What are the operating hours of the College at opening and when it is fully operational?
- 2) What is the proposed length of a classroom session? For example if the first classes begin at 9 AM. Will they end at 10 AM, 10:30 am or some other time?
- 3) Please identify the maximum number of students that the College can accept for classes in any one day
- 4) Of the maximum number of students the college can accommodate in one day, how many are projected to be residents of Malibu.
- 5) How many parking spaces are being provided by the College?
- 6) Assuming you are operating at peak student capacity, how many students will be required to park in parking areas that are not part of the college facility.
- 7) My experience has been that some commuters will remain in the area after the class is over, either to get lunch or to get together as a study group. What is your experience with the number of students who will remain for some reason after their class has ended and how is this factored into your need for parking spaces?
- 8) Where to you propose to place the interpretive center mentioned in your mailed information flyer.
- 9) How many additional people do you expect this interpretive center to draw into the Civic Center on any given day?
- 10) Where will the people visiting the interpretive center park?

Steve Uhring  
23722 Harbor Vista Drive  
Malibu, Calif. 90265

- 11) Once the college is fully operational and teaching the maximum number of students, how many gallons of additional wastewater will be generated over and above what this space is generating today?

Thank you for this opportunity to comment.

Steve Uhring