Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

July 16, 2015

TO: Pat Modugno, Chair
Stephanie Pincetl, Vice Chair
Esther Valadez, Commissioner
David W. Louie, Commissioner
Curt Pedersen, Commissioner

FROM: Kevin Finkel, AICP, Regional Planner KF
Special Projects Section

SUBJECT: Project No. TR067861-(4)
Coastal Development Permit No. 200600007
Conditional Use Permit No. 200600288
Parking Permit No. 200600020
Variance No. 200600012
Environmental Assessment No. 200600216
RPC Meeting: July 22, 2015
Agenda Item: 8

Attached please find California Environmental Quality Act ("CEQA") Findings of Fact for the Addendum to the certified Environmental Impact Report and additional correspondence that was received subsequent to hearing package submittal to the Regional Planning Commission for the above referenced item.

If you need further information, please contact Kevin Finkel at (213) 974-4854 or kfinkel@planning.lacounty.gov. Department office hours are Monday through Thursday from 7:00 a.m. to 6:00 p.m. The Department is closed on Fridays.

SZD:KAF

Enclosure(s):
CEQA Findings of Fact
Letter from Marla Hunter
Letter from Nancy Cotner

FINDINGS OF FACT
regarding MARINA DEL REY MARRIOT COURTYARD AND RESIDENCE INN HOTEL PROJECT (formerly WOODFIN SUITE HOTEL AND TIMESHARE RESORT PROJECT)

PROJECT NO. & TENTATIVE TRACT MAP: TR067861-(4)

COASTAL DEVELOPMENT PERMIT: RCDP200600007

CONDITIONAL USE PERMIT: RCUP200600288

VARIANCE: RVAR200600012

PARKING PERMIT: RPKP200600020

STATE CLEARINGHOUSE NUMBER: 2007031114

FINDINGS OF FACT REGARDING ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT (STATE CLEARINGHOUSE NUMBER 2007031114) FOR THE MARINA DEL REY MARRIOT COURTYARD AND RESIDENCE INN HOTEL PROJECT (formerly WOODFIN SUITE HOTEL AND TIMESHARE RESORT PROJECT) (COUNTY PROJECT NUMBER TR067861-(4))

Having received, reviewed, and considered the foregoing information, as well as any and all other information in the record, the Regional Planning Commission ("Commission") of the County of Los Angeles ("County") hereby finds, determines, and declares as follows:

I. BACKGROUND

A. The Certified EIR

On April 26, 2011, the Board certified the Neptune Marina Apartments and Anchorage/Woodfin Suite Hotel and Timeshare Resort Project Final Environmental Impact Report, State Clearinghouse Number 2007031114, which consists of the Draft Environmental Impact Report ("Draft EIR") dated September 2008, Technical Appendices to the Draft EIR dated September 2008, the Re-Circulated Draft Environmental Impact Report ("Recirculated Draft EIR") dated June 2009, and the Final Environmental Impact Report, including Responses to Comments dated February 2010, (collectively referred to as the "Final EIR,") and found that the Final EIR was completed in compliance with the California Environmental Quality Act (Public Resources Code Section 21000, et seq.) ("CEQA"). The Board certified that it received, reviewed and considered the information contained in the Final EIR. Prior to the Board certification, the Final EIR was certified by the Regional Planning Commission ("Commission") in March 2010. The Final EIR as certified by the Board is referred to hereinafter as the "Certified EIR."

B. The Certified EIR analyzed five separate project components located on three different parcels. These included (1) Neptune Marina on Parcel 10R; (2) Neptune Marina on Parcel 14 (formerly Parcel FF); (3) the Woodfin Suite Hotel and Timeshare Resort on northerly portion of Parcel 9U; (4) a restored public wetland and upland park project on the southerly portion of Parcel 9U; and (5) a public-serving boat anchorage proximal to Parcel 9U within Marina del Rey Basin B. Component 1 includes the landside development of Parcel 10R with of a 400-unit, residential apartment community and waterside development in adjacent Basin B, with a small craft anchorage consisting of 174 boat spaces. Component 2 includes the development of Parcel 14 with a 126-unit apartment building and appurtenant improvements. Components 4 and 5 are associated with and offset the loss of open space-designated land (which currently is developed with a public surface parking lot) that will result from the development of Neptune Marina Parcel 14. All of these project components, with the exception of the Woodfin Suite Hotel and Timeshare Resort, were approved by the Board at the April 2011 public hearing. With respect to the Woodfin Suite Hotel and Timeshare Resort, the Board remanded the project and all of its related entitlements back to the Commission and

Marina del Rey Design Control Board ("DCB") for further review and consideration.

The Former Woodfin Suite Hotel and Timeshare Resort Project

The original development analyzed in the Certified EIR was referred to as the "Woodfin Suite Hotel and Timeshare Resort" (Component 3) and was proposed on the northerly approximately 2.20 acres of Parcel 9U. That proposed project consisted of a 19-story hotel structure with 288 hotel and timeshare suites consisting of a minimum of 152 conventional hotel suites and 136 timeshare suites, meeting rooms, a restaurant and bar/lounge, a spa/fitness center (including an outdoor pool), sundry shop and associated hotel operations space, such as the lobby, hallways, elevator shafts, mechanical rooms, offices, and laundry, maintenance and custodial facilities. The building also proposed an outdoor terrace and a large third floor deck with a pool, which overlooked the waters of the marina. In total, up to 21 fee-based "self-park" and 339 valet-managed parking spaces were proposed in a six-level parking garage, with one level below grade, for a project total of 360 parking spaces (hereinafter referred to as the "Original Project"). The Original Project included a rooftop helistop, and the sale of alcoholic beverages for on-site consumption at the proposed accessory hotel restaurant and outdoor terrace dining area. A parking permit for shared use of on-site parking and valet parking service and a variance to allow a reduced yard setback adjacent to the waterfront pedestrian promenade were also part of the original discretionary request.

Consistent with the Marina del Rey certified Local Coastal Plan ("LCP"), the height of the hotel structure was proposed to not exceed 225 feet (exclusive of appurtenant, screened rooftop equipment) when measured per County standards. The previously proposed hotel/timeshare resort structure was oriented on the site in a fashion that maximized public views to the water from Via Marina. The structure provided frontage on Via Marina over the northerly portion of the parcel. Also consistent with the LCP height standards allowing for a building with a maximum height of 225 feet on this parcel, the Original Project was designed with an unobstructed view corridor comprising at least 40 percent of the parcel's frontage on Via Marina; this large public view corridor was provided over the public wetland park to be developed on the southerly approximately 1.46 acres of Parcel 9U. Public viewing of the harbor was to be enhanced through the Original Project's development of a 28-foot-wide public pedestrian promenade along the parcel's entire waterfront. The public could access both the public waterfront promenade and adjacent wetland park at multiple access points provided within the hotel/timeshare resort facility. The Original Project required approximately 44,000 cubic yards of grading, with approximately 1,800 cubic yards of cut soil being balanced on-site and approximately 42,200 cubic yards of the cut soil being exported to a landfill located in Los Angeles County for use as daily cover.

The Board and Commission determined, based on the Final EIR, that Original Project design features, mitigation measures, and conditions of approval will reduce project-specific impacts concerning Geotechnical Resources and Soils, Operational Noise, Hydrology and Drainage, Operational Air Quality, Biota, Traffic, Sewer Service, Water Service, Solid Waste, Education, Police Services, Fire Services, Library Services, Parks and Recreation, Population and Housing, and Land Use and Planning to less than significant levels. In addition, the Board and Commission determined that there were are no significant cumulative impacts, or that

Original Project design features, mitigation measures, and conditions of approval will reduce the Project's contribution to less than cumulatively considerable levels, concerning Geotechnical Resources and Soils, Operational Noise, Hydrology and Drainage, Operational Air Quality, Wind Patterns, Global Climate Change, Biota, Visual Character from Distant Locations, Sewer Service, Water Service, Education, Police Services, Fire Services, Library Services, and Parks and Recreation.

The Board and Commission determined that, although Final EIR mitigation measures and design features included as part of the Original Project will reduce the following effects, the following effects could not be feasibly or effectively mitigated to less than significant levels: construction-related Noise and Vibration impacts, construction-related Air Quality impacts, Visual Character impacts from immediately adjacent locations, cumulative construction Noise and Vibration impacts, cumulative construction Air Quality impacts, cumulative Visual Resources impacts relating to projects in the immediate Project vicinity, cumulative Construction Traffic impacts, cumulative Operational Traffic impacts, cumulative Solid Waste service impacts, cumulative Population and Housing impacts, and consequently cumulative impacts to Land Use and Planning.

II. THE REDUCED-SCALE PROJECT

Following completion and certification of the Final EIR, and remand of the Original Project by the Board to the Commission and DCB, the applicant for the Woodfin Suite Hotel and Timeshare Resort Project revised the project design consistent with the direction of the Board. The applicant significantly reduced the project's height, size and massing (the "Reduced-Scale Project"): the overall height of the hotel structure has been reduced from 225 feet plus rooftop appurtenances to a maximum height of approximately 72 feet (approximately 61 feet along the Via Marina frontage with the approximately 72-foot tower slightly setback from Via Marina). The Reduced-Scale Project would provide 288 hotel guestrooms (the Original Project contained 288 hotel guest suites), but these guestrooms would now be provided in two lower-rise building "wings" oriented to the north (Parcel 10R-facing) and south (wetland park-facing) instead of a single 19-story tower. In addition, the applicant eliminated the timeshare component that had been part of the Original Project.

The Reduced-Scale Project includes development of the northerly approximately 2.2 acres of Parcel 9U and is referred to as the "The Marina del Rey Marriott Courtyard and Residence Inn Hotel." Proposed development under the Reduced-Scale Project consists of one structure containing a five-story hotel "wing" (tower height of approximately 61 feet) and a six-story hotel wing (tower height of approximately 72 feet) with 288 hotel guestrooms, two meeting rooms, a hotel-oriented restaurant and bar/lounge, fitness center (including, an outdoor pool and spa), and associated hotel operations space, such as the lobby, hallways, elevator shafts, mechanical rooms, offices, and laundry, maintenance and custodial facilities. The building would also feature an outdoor patio/terrace, a large second floor deck with a pool, both of which would overlook the waters of the Marina and a 28-foot-wide pedestrian promenade (approximately 386 feet in length).

The Marriott Courtyard wing would be designed primarily with family vacationers and business travelers in mind. Courtyard features would include a multi-use public area with a variety of working spaces for small group meetings or individual use, free Wi-Fi, in-room desks with power stations and a sundry store (24-hour mini market). The Marriott Residence Inn wing would include amenities and services allowing guests to maintain their personal, family and business routines while providing personal comforts, such as kitchenettes for self-prepared meals.

The Reduced-Scale Project would require approximately 30,000 cubic yards of grading, with approximately 28,000 cubic yards of cut soil being exported to a landfill located in Los Angeles County. Consistent with County Code parking requirements, which require a total of 165 parking spaces for the Reduced-Scale Project, a minimum of 212 parking spaces would be provided in a single-level subterranean parking garage to serve the proposed hotel and accessory uses, as well as an additional 21 public parking spaces (four of which would be free self-park and the remaining 17 valet parked) available for the adjacent Wetland Park, for a total parking supply of 231 spaces. The garage parking would be 100% valet serviced; as previously proposed, the applicant is seeking a Parking Permit to authorize commercial valet parking.

Consistent with the Marina del Rey certified LCP, the height of the Reduced-Scale Project's hotel structure would not exceed approximately 72 feet (exclusive of appurtenant, screened rooftop equipment) when measured per County standards. The certified LCP classifies the northerly, "Hotel"-designated portion of the subject parcel as Height Category 5, allowing a maximum building height of 225 feet with provision of a view corridor comprising at least 40 percent of the parcel's water frontage. The hotel structure has been oriented on the site in a fashion that maximizes public views to the water from Via Marina. The structure would front on Via Marina over the northerly portion of the parcel. The Reduced-Scale Project has been designed with an unobstructed view corridor comprising 41 percent of the parcel's frontage on Via Marina (159 feet); this large public view corridor would be provided over the public Wetland Park to be developed on the southerly approximately 1.46 acres of the parcel. Public viewing of the harbor would be further enhanced through the Reduced-Scale Project's development of a 28-foot-wide public pedestrian promenade along the parcel's entire water frontage (which would connect seamlessly to the waterfront pedestrian promenade being constructed as part of the Parcel 10R project component). Public access from Via Marina to the waterfront would be provided along the perimeter of the adjacent public Wetland Park. Moreover, the public would be able to access both the public waterfront promenade and adjacent Wetland Park at multiple access points to be provided within the proposed hotel facility.

The reduced scale of the ancillary elements under the Reduced-Scale Project (i.e., elimination of the formal ballroom, replacement of the spa with a gym for hotel guests, reduction of structured and underground parking areas and associated reduction in required grading, etc.) would likely reduce impacts with respect to issues that are affected by the scale of such uses, including traffic, mobile air quality, mobile noise, public utilities, and public services. However, for the purposes of these findings, the Commission has conservatively assumed no reduction and that the Reduced-Scale Project would generally generate the same level of impacts as the Original Project, except with respect to visual character.

The Reduced-Scale Project requires the following County approvals:

- Coastal Development Permit
- Conditional Use Permit
- Parking Permit
- Variance

An Addendum dated October 2014 was prepared that addresses Component 3 (now the Reduced-Scale Project), which the Board remanded back to the Commission and DCB for further consideration at the Board's April 2011 appeal hearing on the Original Project, to determine whether any significant environmental impacts that were not identified in the original Certified EIR would result, or whether previously-identified significant impacts would be substantially more severe with the development of the Reduced-Scale Project, as compared to the Original Project. In accordance with the LCP and the Board's direction, the Reduced-Scale Project plans were reviewed and conceptually approved by the DCB on January 22, 2014.

III. ADDENDUM FINDINGS

A. Environmental Impact Findings

1. Geotechnical and Soil Resources

The Original Project: With mitigation, the Original Project would not significantly impact the geologic environment during either site construction or operation. Impacts would occur in the form of development in a region where severe ground shaking can occur, adverse effects of liquefaction on building foundations, and minor impacts associated with wind and water erosion. However, mitigation measures are incorporated that would reduce these impacts to levels that are not considered significant. Cumulative geotechnical and soils impacts would also be less than significant given the localized and site-specific nature of geotechnical hazards. Based on the five significance thresholds for geotechnical and soil resources impacts, the Original Project would have less than significant impacts with the implementation of mitigation measures or have no impact.

The Reduced-Scale Project: The Reduced-Scale Project would require less grading and excavation and would implement the same mitigation measures as required by the Original Project. It would therefore have the same or lesser impacts in association with geotechnical and soil resources. As such, like the Original Project, the Reduced-Scale Project can be concluded as having a less than significant cumulative and project-specific impact.

The Reduced-Scale Project would not result in any new significant impacts and would not substantially increase the severity of any previously identified significant impacts with respect to geotechnical and soil resources.

2. Noise

a. Construction Noise

i. Construction Equipment Noise

The Original Project: The Certified EIR for the Original Project evaluated construction-related noise impacts relative to County's Noise Control Ordinance standards for construction equipment. Construction of the Original Project would result in increases in ambient noise levels in the project area on an intermittent basis. As described in the Certified EIR, construction would temporarily increase noise depending on the type of construction activity, equipment type and duration of use, the distance between the noise source and receptor, and the presence or absence of noise attenuation barriers. The Certified EIR includes mitigation measures that would reduce construction noise impacts. Nonetheless, the Certified EIR concluded that the Original Project would have significant and unavoidable project-specific and cumulative construction noise impacts.

The Reduced-Scale Project: The Original Project included the development of a hotel tower 225 feet in height with hotel suites and timeshare units, as well as hotel amenities and parking. The Reduced-Scale Project would result in the development of two hotel towers at a maximum of approximately 72 feet in height. The Reduced-Scale Project would not change the number of hotel rooms (288 guestrooms will be developed). The Reduced-Scale Project would result in an overall decrease of 7,637 square feet in ancillary hotel uses compared to the Original Project – from 21,436 square feet to 13,799 square feet which is primarily due to the elimination of the ballroom, banquet kitchen and spa facilities under the Reduced-Scale Project. The Marriott Courtyard restaurant would have a smaller dining area than the Original Project restaurant by 504 square feet. The Marriott Residence Inn would have its own dining area of 1,250 square feet. The Reduced-Scale Project would also reduce the amount of excavated and exported soil from approximately 44,000 cubic yards (cy) cut (42,200 cy exported) to approximately 30,000 cy cut (28,000 cy exported), as compared to the Original Project.

The increase in construction activity associated with the increase in restaurant floor area would be offset by a reduction in the floor area for meeting rooms and ballrooms and the reduction in excavated and exported soil. As a result, the number and type of construction equipment used for the Reduced-Scale Project would be the same or similar to the equipment considered in the Certified EIR for the Original Project, and would include tractors (dozers), loaders, concrete mixers, cranes and smaller equipment, including jackhammers, pneumatic tools, saws, and hammers, as described in the Certified EIR for the Original Project. Noise levels generated by heavy equipment under the Reduced-Scale Project would be the same or

similar to the Original Project and would range from approximately 76 dB(A) to noise levels in excess of 100 dB(A) when measured at 50 feet. Although the construction noise under the Reduced-Scale Project would diminish rapidly with distance from the construction site at a rate of approximately 6 dB(A) per doubling of distance, the nearest sensitive receptors located approximately 125 feet west of the Project site long Via Marina and other nearby locations with an uninterrupted line of sight to the construction activity would be temporarily exposed to exterior noise levels that could exceed the County's Noise Control Ordinance standards for construction equipment noise levels.

Construction of the Reduced-Scale Project would comply with the required construction-related mitigation measures as identified in the Certified EIR. However, like the Original Project, the Reduced-Scale Project would have significant and unavoidable project-specific and cumulative construction noise impacts. Therefore, the construction-related noise associated with the Reduced-Scale Project would not result in any new significant impacts and would not substantially increase the severity of any previously identified significant impacts.

ii. Haul Route and Construction Worker Noise

The Original Project: The Certified EIR for the Original Project evaluated noise impacts to sensitive receptors from haul trucks transporting materials to and from the Project site. It concluded that the Original Project would have significant and unavoidable project-specific and cumulative impact associated with delivery- and haul truck-related noise, but less than significant impacts with respect to construction worker trip noise.

The Reduced-Scale Project: The Reduced-Scale Project would result in an overall decrease of 7,637 square feet in ancillary hotel uses (e.g., restaurant, meeting space, bar/lounge, etc.) compared to the Original Project, from 21,436 square feet to 13,799 square feet, which is primarily due to the elimination of ballroom and spa facilities under the Reduced-Scale Project. The Reduced-Scale Project would modestly increase restaurant floor area, but would substantially reduce the floor area for meeting rooms, spa facilities, and ballrooms. The increase in restaurant floor area would be more than offset by the reduction in floor area for meeting rooms, spa facilities, and ballrooms. Thus, no additional construction building material trips would occur under the Reduced-Scale Project, as compared to the Original Project, since the total building floor area would be substantially reduced.

The Reduced-Scale Project would reduce the amount of excavated and exported soil from approximately 44,000 cubic yards ("cy") cut (42,200 cy exported) to approximately 30,000 cy cut (28,000 cy exported), as compared to the Original Project. As a result, while a single haul truck traveling on a roadway passing a sensitive land use would result in similar noise levels under the Reduced-Scale Project as that considered in the EIR for the Original Project, fewer total haul truck trips would occur given the reduction in the amount of excavated soil. Nonetheless, the Reduced-Scale Project would have significant and unavoidable project-specific and cumulative impact associated with delivery- and haul truck-related noise, like the Original Project.

Construction workers could contribute to increases in vehicular noise along roadways in the project study area. Construction worker traffic, which would be largely comprised of passenger vehicles and light pick-up trucks, would not represent a substantial percentage of peak hour volumes in the area and would not cause an audible increase in community noise levels. The Reduced-Scale Project would utilize a similar number of construction workers and, therefore, would result in construction worker trip volumes similar to the Original Project and project-specific and cumulative impacts would also be less than significant.

The delivery- and haul truck-related noise associated with the Reduced-Scale Project would not result in any new significant impacts and would not substantially increase the severity of any previously identified significant impacts.

The construction worker trip noise associated with the Reduced-Scale Project would not result in any new significant impacts and would not substantially increase the severity of any previously identified significant impacts.

iii. Vibration

The Original Project: The Certified EIR for the Original Project evaluated vibration impacts to sensitive receptors from pile drivers during foundation construction, as well as lesser vibration impacts that could result from the use of other heavy construction equipment and haul trucks passing on streets adjacent to sensitive receptors. It concluded that the Original Project would have significant and unavoidable project-specific and cumulative impacts associated with construction vibration.

The Reduced-Scale Project: As discussed above, the number and type of construction-equipment used for the Reduced-Scale Project would be the same or similar to the equipment considered in the EIR for the Original Project. Furthermore, no additional construction building material trips would occur under the Reduced-Scale Project, as compared to the Original Project, since the total building floor area would be similar. The Reduced-Scale Project would reduce the amount of excavated and exported soil from approximately 44,000 cy cut (42,200 cy exported) to approximately 30,000 cy cut (28,000 cy exported), as compared to the Original Project.

While a single haul truck traveling on a roadway passing a sensitive land use would result in similar vibration levels under the Reduced-Scale Project as that compared to the Original Project, fewer total haul truck trips would occur given the reduction in the amount of excavated soil. Thus, although like the Original Project, the Reduced-Scale Project would have significant and unavoidable project-specific and cumulative impacts associated with vibration from haul trucks, vibration associated with the Reduced-Scale Project would not result in any new significant impacts and would not substantially increase the severity of any previously identified significant impacts.

b. Operational Noise

i. Point Source Noise

The Original Project: Occupation of the Project site would result in intermittent sounds associated with human activity similar to a residential use, such as people talking, doors slamming, and lawn care equipment operation. The Certified EIR found that the Original Project would result in less than significant project-specific and cumulative noise impacts with respect to point source noise.

The Reduced-Scale Project: The Reduced-Scale Project would include the same number of hotel rooms and the same uses as the Original Project. It would not introduce new point sources of noise, as compared to the Original Project.

Like the Original Project, the Reduced-Scale Project's project-specific and cumulative impacts with respect to point source noise would be less than significant and would not result in any new significant point source noise impacts or substantially increase the severity of any previously identified significant impacts.

ii. Mobile Source Noise

The Original Project: The Certified EIR determined that the Original Project's project-specific and cumulative impacts with respect to mobile source noise would be less than significant.

The Reduced-Scale Project: Operation of the Reduced-Scale Project, like the Original Project, would generate mobile sources of noise, as a result of normal day-to-day vehicle trips to and from the Project site. A supplemental traffic impact analysis ("Supplemental TIA") was prepared for the Reduced-Scale Project by Crain & Associates Transportation Planning & Traffic Engineering in January 2014, (Appendix B of the Addendum). The Supplemental TIA assesses the change in vehicle trips associated with the Reduced-Scale Project, as compared to the Original Project. The updated traffic analysis indicates that vehicle trips associated with the Reduced-Scale Project would be the same as, or similar to, those associated with the Original Project, and that the baseline and future traffic conditions adequately describe the existing traffic conditions, Project traffic conditions, and future plus Project traffic conditions.

Since the number of vehicle trips would be the same or similar under the Reduced-Scale Project as compared to the Original Project, the Reduced-Scale Project would result in the same or similar mobile source noise levels. Therefore, like the Original Project, the Reduced-Scale Project's project-specific and cumulative impacts with respect to mobile source noise would be less than significant. As a result, mobile source noise levels associated with the Reduced-Scale Project would not result in any new significant impacts and would not substantially increase the severity of any previously identified significant impacts.

3. Hydrology and Drainage

The Original Project: The Certified EIR determined that implementation of the hydrology/drainage mitigation measures identified for the Original Project would reduce the Original Project's erosion, sedimentation, and water quality impacts to less than significant

levels, in accordance with Los Angeles County Department of Public Works ("LACDPW") and Regional Water Quality Control Board ("RWQCB") requirements. Therefore, no unavoidable significant project-specific impacts would be anticipated. Cumulative impacts would also be less than significant.

The Reduced-Scale Project: The Reduced-Scale Project would involve less grading and less excavation, would result in a similar amount of impervious surface, and would implement the same mitigation measures as required by the Original Project.

The Reduced-Scale Project would have the same or lesser impacts in association with hydrology and drainage, and, like the Original Project, the Reduced-Scale Project would have a less than significant project-specific and cumulative impact. Therefore, the Reduced-Scale Project would not result in any new significant impacts and would not substantially increase the severity of any previously identified significant impacts with respect to hydrology and drainage.

4. Air Quality

a. Construction Air Quality

i. Regional Construction Emissions

The Original Project: The Certified EIR for the Original Project evaluated construction-related criteria pollutant emissions relative to the South Coast Air Quality Management District ("SCAQMD") thresholds of significance. The Certified EIR includes mitigation measures that would reduce emissions of diesel exhaust and fugitive dust. Nonetheless, the Certified EIR concluded that the Original Project would result in temporary significant and unavoidable project-specific and cumulative impacts with respect to regional nitrogen oxides (NO_X) emissions.

The Reduced-Scale Project: Like the Original Project, construction of the Reduced-Scale Project would generate criteria air pollutant emissions from a variety of stationary, area, and mobile sources. Fugitive dust emissions (respirable particulate matter [PM_{10}] and fine particulate matter [$PM_{2.5}$]) would be generated by on-site construction activities such as site excavation and grading. Emissions of volatile organic compounds (VOCs), NOX, carbon monoxide (CO), sulfur dioxide (SO_2), PM_{10}, and $PM_{2.5}$ would be generated by on-site stationary sources, heavy-duty construction vehicles, construction worker vehicles and generators. The daily construction emissions of these air pollutants for the Original Project and the Reduced-Scale Project were estimated using the SCAQMD-approved California Emissions Estimator Model (CalEEMod) and are detailed in Addendum Table 2, Estimated Regional Construction Emissions – Original Project and Reduced Scale Project.

The Original Project included the development of a hotel tower 225 feet in height with hotel suites and timeshare units, as well as hotel amenities and parking. The Reduced-Scale Project would result in the development of two hotel towers at approximately 61 feet and 72 feet,

respectively. The Reduced-Scale Project would not change the number of hotel rooms (288 guestrooms would be developed). The Reduced-Scale Project would result in an overall decrease of 7,637 square feet in ancillary hotel uses (e.g., restaurant, meeting space, bar/lounge, etc.) compared to the Original Project, from 21,436 square feet to 13,799 square feet, which is primarily due to the elimination of ballroom and spa facilities under the Reduced-Scale Project. The Reduced-Scale Project would also reduce the amount of excavated and exported soil from approximately 44,000 cy cut (42,200 cy exported) to approximately 30,000 cy cut (28,000 cy exported). The reduction in the amount of excavated and exported soil would reduce emissions associated with haul trucks.

With respect to construction-related emissions, the increase in construction activity associated with the increase in restaurant floor area would be offset by a reduction in the floor area for meeting rooms and ballrooms and the reduction in excavated and exported soil. As a result, maximum construction-related emissions for the Reduced-Scale Project would not be substantially different than the emissions considered in the Certified EIR, as shown in Addendum Table 2.

Emissions of CO, SO_X, and PM_{10} are slightly higher for the Reduced-Scale Project, as compared to the Original Project, primarily due to the use of updated emission factors in the OFFROAD2011 model, which is the current emissions factor model for off-road equipment. For some equipment, the OFFROAD2011 model has higher emission factors for CO, SOX, and PM_{10} than the prior OFFROAD2007 model, which was the current model at the time that the Original Project was assessed. In addition, CalEEMod contains updated estimates of the number of vendor trips associated with building construction. For commercial and residential projects, CalEEMod estimates a greater number of vendor trips than the previously approved model at the time the Original Project was assessed. Vendor trips result in combustion and fugitive road dust (i.e., PM_{10}) emissions. Emissions of VOCs are slightly higher for the Reduced-Scale Project, as compared to the Original Project, primarily due to improvements in the emissions model that allows for the input of more project-specific data to more accurately estimate the amount of interior and exterior surface area that could require architectural coating, which results in off-gassing emissions of VOCs. Nonetheless, CO, SO_x and PM_{10} emissions from the Reduced-Scale Project would be below the SCAQMD thresholds of significance.

Like the Original Project, construction of the Reduced-Scale Project would comply with the required construction-related mitigation measures as identified in the EIR. However, as with the Original Project, construction of the Reduced-Scale Project would result significant and unavoidable project-specific and cumulative impacts with respect to regional NOx emissions.

The construction-related emissions associated with the Reduced-Scale Project would not result in any new significant impacts and would not substantially increase the severity of any previously identified significant impacts.

ii. Localized Significance Impacts

The Original Project: The Certified EIR for the Original Project evaluated localized construction impacts in accordance with the SCAQMD's Final Localized Significance Threshold Methodology (LST Methodology). The Certified EIR concluded that the Original Project would result in temporary project-specific and cumulative impacts with respect to NO_2, PM_{10}, and $PM_{2.5}$ emissions.

The Reduced-Scale Project: As explained above, construction-related emissions for the Reduced-Scale Project would not be substantially different than the emissions considered in the EIR for the Original Project. Emissions of CO, SOX, and PM_{10} are slightly higher for the Reduced-Scale Project, as compared to the Original Project, primarily due to the use of updated emission factors in the OFFROAD2011 model that, for some equipment, has higher emission factors for CO, SOX, and PM_{10} than the prior OFFROAD2007 model. In addition, CalEEMod contains updated estimates of the number of vendor trips associated with building construction that results in a greater number of vendor trips than the previously approved model at the time the Original Project was assessed. Emissions of VOCs are slightly higher for the Reduced-Scale Project, as compared to the Original Project, primarily due to improvements in the emissions model that allows for the input of more project-specific data to more accurately estimate the amount of interior and exterior surface area that could require architectural coating. Construction of the Reduced-Scale Project would comply with the required construction-related mitigation measures as identified in the EIR.

Nonetheless, on-site emissions during construction would not be substantially different than the emissions considered in the EIR for the Original Project, and like the Original Project, temporary project-specific and cumulative impacts with respect to localized NO_2, PM_{10}, and $PM_{2.5}$ would be significant and unavoidable. As a result, construction-related emissions associated with the Reduced-Scale Project would not result in any new localized significant impacts and would not substantially increase the severity of the previously identified localized significant impacts.

iii. Toxic Air Contaminants

The Original Project: Construction of the Original Project would generate diesel particulate matter (DPM) emissions, which the California Air Resources Board (CARB) has identified as a toxic air contaminant (TAC). The Certified EIR found that the Original Project would result in less than significant project-specific and cumulative impacts with respect to TACs.

The Reduced-Scale Project: As explained above, construction-related emissions for the Reduced-Scale Project would not be substantially different than the emissions considered in the Certified EIR for the Original Project, although emissions during the grading phase could be lower, given the reduction in the number of haul trucks. Construction of the Reduced-Scale Project would comply with the required construction-related mitigation measures identified in the Certified EIR. Therefore, DPM emissions from the Reduced-Scale Project would not be substantially different than the DPM emissions generated by the Original Project.

Project-specific and cumulative impacts from TAC emissions associated with the Reduced-Scale Project would be the same or less than the Original Project and, also, less than significant. Therefore, the Reduced-Scale Project would not result in any new significant impacts and would not substantially increase the severity of any previously identified significant impacts with respect to TAC emissions.

b. Operation Air Quality

i. Operational Emissions

The Original Project: Operational emissions would be generated primarily by area and mobile sources, as a result of normal day-to-day activities on the Project site after occupation. Area source emissions are associated with natural gas combustion for heating and cooking, landscaping emissions, and volatile emissions from the reapplication of architectural coatings and the use of consumer products. The Certified EIR found that the Original Project would result in less than significant project-specific and cumulative impacts with respect to operational emissions.

The Reduced-Scale Project: The building floor area of the Reduced-Scale Project would be similar to the Original Project. The Reduced-Scale Project would not change the number of hotel rooms. The Reduced-Scale Project would result in an overall decrease of 7,637 square feet in ancillary hotel uses (e.g., restaurant, meeting space, bar/lounge, etc.) compared to the Original Project, from 21,436 square feet to 13,799 square feet, which is primarily due to the elimination of ballroom and spa facilities under the Reduced-Scale Project. As a result, area source emissions for the Reduced-Scale Project would be similar to those generated by the Original Project. The Supplemental TIA (Addendum Appendix B) assessed the change in vehicle trips associated with the Reduced-Scale Project. The Supplemental TIA indicates that vehicle trips associated with the Reduced-Scale Project would be the same as, or similar to, those of the Original Project, and that the baseline and future traffic conditions set forth in the Certified EIR adequately describe the existing traffic conditions, Project traffic conditions, and future plus Project traffic conditions.

As shown in the Certified EIR, the majority of the Original Project's operational emissions are from mobile sources. Similar to the Original Project, the majority of the operational emissions of the Reduced-Scale Project would be from mobile sources. The daily operational emissions for the Original Project and the Reduced-Scale Project are shown in Addendum Table 3, Estimated Regional Operational Emissions – Original Project and Reduced-Scale Project.

The operational emissions under the Reduced-Scale Project would be similar or less than the Original Project, and would be less than the SCAQMD thresholds of significance. Therefore, the operational-related emissions associated with the Reduced-Scale Project would be less than significant, and would not result in any new significant impacts and would not substantially increase the severity of any previously identified significant impacts.

ii. Carbon Monoxide Hotspots

The Original Project: Localized areas where ambient CO concentrations exceed state and/or federal standards are termed CO "hotspots." Traffic congested roadways and intersections have the potential to generate localized high levels of CO. The Certified EIR evaluated the Original Project's potential for CO hotspots and found that the Original Project would not result in traffic congestion that would cause or contribute to the formation of CO hotspots in excess of the significance thresholds.

The Reduced-Scale Project: The Reduced-Scale Project would result in the same or similar vehicle trips as compared to the Original Project.

The Reduced-Scale Project's project-specific and cumulative CO hotspot impacts would remain the same as the Original Project and would be less than significant. Therefore, the Reduced-Scale Project would not result in any new significant impacts and would not substantially increase the severity of any previously identified significant impacts with respect to CO hotspot impacts.

iii. Odors

The Original Project: The proposed uses of the Original Project would not generate objectionable odors that would impact sensitive receptors and would not be subject to off-site sources of objectionable odors as determined in the Certified EIR.

The Reduced-Scale Project: The Reduced-Scale Project would consist of the same uses and would not introduce any new sources of odors.

Like the Original Project, the Reduced-Scale Project would have less than significant project-specific and cumulative impacts with respect to odors. Therefore, the Reduced-Scale Project would not result in any new significant impacts and would not substantially increase the severity of any previously identified significant impacts with respect to odors.

iv. Toxic Air Contaminants (TACs)

The Original Project: The proposed uses of the Original Project would not use hazardous materials or emit TACs in appreciable quantities aside from any incidental emissions from the use of household cleaning products, as determined in the Certified EIR.

The Reduced-Scale Project: The Reduced-Scale Project would consist of the same uses and would not introduce any new sources of hazardous material or TACs.

The Reduced-Scale Project would not result in any new significant TAC impacts. Like the Original Project, the Reduced-Scale Project would have a less than significant project-specific and cumulative impacts with respect to TAC Impacts. Therefore, the Reduced-Scale Project would not result in any new significant impacts and would not substantially

increase the severity of any previously identified significant impacts with respect to TAC impacts.

v. Wind

The Original Project: As discussed in the Certified EIR, Rowan Williams Davies & Irwin, Inc. ("RWDI") prepared a wind study in 2004 for the Original Project to assess the potential impact of the development and/or building placement on wind patterns within the marina, loss of surface winds used by birds and sailboats and general air circulation. (Appendix 5.4 of the Certified EIR for the Original Project.) The report concluded that the Original Project would not affect the general air circulation patterns and the use of surface winds by birds and sailboats, and that the wind conditions would be similar under the Project as compared to existing conditions.

The Reduced-Scale Project: The Reduced-Scale Project would result in the development of two hotel towers at approximately 61 feet and 72 feet, respectively, a significant reduction from the 225 feet height for the single-tower design in the Original Project. In 2011, RWDI prepared an assessment of a "two-wing" hotel design, with each hotel wing having a height of 70 feet (Addendum Appendix A). RWDI concluded that the building heights of the two wings would be similar in height as the existing buildings to the west of the Project site, which is the prevailing wind direction in the area. As a result, the general air circulation patterns and the use of surface winds by birds and sailboats in Marina del Rey would not be affected by the development. As the Reduced-Scale Project would include a two-wing design with similar building heights to those considered in RDWI's 2011 assessment, the conclusions presented in the 2011 assessment would also apply to the Reduced-Scale Project.

The Reduced-Scale Project's project-specific and cumulative wind impacts would be less than significant. The Reduced-Scale Project would not result in any new significant wind impacts and would not substantially increase the severity of any previously identified significant impacts.

5. Greenhouse Gas Emissions

The Original Project: The Certified EIR for the Original Project evaluated construction- and operational-related greenhouse gas (GHG) emissions from direct and indirect sources. Construction of the Original Project would generate GHG emissions from a variety of stationary, area, and mobile sources, such as heavy-duty construction vehicles, construction worker vehicles and generators. Operational emissions would be generated primarily by area and mobile sources, as a result of normal day-to-day activities on the Project site after occupation. The Original Project included the development of a hotel tower 225 feet in height with hotel suites and timeshare units, as well as hotel amenities and parking. The Certified EIR found that the Original Project would result in less than significant project-specific and cumulative impacts with respect to GHGs and climate change.

The Reduced-Scale Project: The Reduced-Scale Project would result in the development of a single hotel structure containing two hotel wings with a height of approximately 61 feet and 72 feet, respectively. The Reduced-Scale Project would result in an overall decrease of 7,637 square feet in ancillary hotel uses compared to the Original Project, from 21,436 square feet to 13,799 square feet, which is primarily due to the elimination of ballroom and spa facilities under the Reduced-Scale Project. The Reduced-Scale Project would not change the number of hotel guestrooms (288 guestrooms would be developed). As such, GHG emissions associated with natural gas, electricity, water, and waste for the Reduced-Scale Project would be similar those associated with the Original Project.

The Reduced-Scale Project would also reduce the amount of excavated and exported soil from approximately 44,000 cy cut (42,200 cy exported) to approximately 30,000 cy cut (28,000 cy exported). The reduction in the amount of excavated and exported soil would reduce emissions associated with haul trucks.

With respect to construction-related GHG emissions, the increase in construction activity associated with the increase in restaurant floor area for the Reduced-Scale Project would be offset by a reduction in the floor area for meeting rooms and ballrooms and the reduction in excavated and exported soil. As a result, construction-related GHG emissions for the Reduced-Scale Project would not be substantially different than the GHG emissions considered in the Certified EIR.

An updated traffic analysis was prepared to assess the change in vehicle trips associated with the Reduced-Scale Project. The traffic analysis indicates that vehicle trips associated with the Reduced-Scale Project would be the same or similar to those from the Original Project, and that the baseline and future traffic conditions described in the Certified EIR adequately describe the existing traffic conditions, Project traffic conditions, and future plus Project traffic conditions. Consequently, mobile source operational GHG emissions under the Reduced-Scale Project would be the same as, or similar to, those from the Original Project.

The County of Los Angeles has adopted the 2013 California Green Building Standards Code. As would be the case with the Original Project, the Reduced-Scale Project would comply with the applicable provisions of the County's Green Building Standards. With the incorporation of certain design features, the Reduced-Scale Project will benefit from a reduction in energy consumption consistent with the requirements of the Green Building Standards. The following project design features will be incorporated into the final building plans for the Reduced-Scale Project:

- alternative transportation considerations, such as encouraging bicycle transit and fuel efficient vehicles;
- restore wetland habitat within dedicated open space area;
- reduce stormwater runoff through incorporation of best management practices;

- use of roofing materials with high solar reflectance index;
- water efficient landscaping through use of drought-tolerant species and smart irrigation controllers; use of high efficient toilets;
- use of energy efficient equipment and appliances; use of non-ozone depleting refrigerants; incorporation of recycled and rapidly renewable building materials;
- monitoring of ventilation systems; development of indoor air quality management plans;
- use of low-emitting volatile organic compound materials (e.g., in sealants and paints); and
- provision of individual control for lighting and comfort control systems.

The Reduced-Scale Project would implement all of the mitigation measures in the Certified EIR to reduce GHG emissions. As with the Original Project, these measures would reduce the Reduced-Scale Project's impacts from GHG emissions to less than significant.

The GHG emissions for the Original Project and the Reduced-Scale Project are shown in Addendum Table 5, Comparison of Certified and Addendum EIR Operational GHG Emissions. Table 5 also provides GHG emissions from a representative business-as-usual (BAU) project of similar size and land use relative to the Reduced-Scale Project. The emission reductions necessary to achieve the appropriate 2020 emissions target would be a reduction of GHG emissions by 15.8 percent, below the estimated BAU levels. The Reduced-Scale Project would be consistent with the reduction goal of 15.8 percent below BAU (Reduced-Scale Project net change from BAU is 16.6%).

Like the Original Project, the Reduced-Scale Project would have a less than significant project-specific and cumulative impacts with respect to GHGs and climate change. Therefore, the Reduced-Scale Project would not result in any new significant impacts and would not substantially increase the severity of any previously identified significant impacts with respect to GHGs and climate change.

6. Biota

The Original Project: Biota impacts from the Original Project would occur in the form of increased turbidity and human presence in the marine environment. With implementation of mitigation measures prescribed, the Certified EIR concluded the Original Project would not significantly impact biota, either during site construction or operation. Cumulative impacts were also found to be less than significant.

The Reduced-Scale Project: The Reduced-Scale Project would have a similar footprint, would involve similar construction activity, would result in restoration of the existing

degraded wetland, and would implement the same mitigation measures as required of the Original Project.

The Reduced-Scale Project will have the same or lesser impacts regarding biota as compared to the Original Project. Like the Original Project, the Reduced-Scale Project will have less than significant project-specific and cumulative impacts with respect to biota. Therefore, the Reduced-Scale Project would not result in any new significant impacts and would not substantially increase the severity of any previously identified significant impacts with respect to biota.

7. Visual Quality

The Original Project: The Original Project was consistent with the 225-foot building height limit allowed with an expanded view corridor for the northerly 2.2 acres of Parcel 9U in the certified LCP (the Original Project on Parcel 9U would not exceed 225 feet from the finished pad elevation, exclusive of appurtenant, screened roof-top equipment, parapets and architectural features). The Original Project provided all required view corridors; and the Original Project was reviewed and conceptually approved by the DCB. The Original Project's proposed height, at 225 feet, was deemed in the Certified EIR to be out of character with existing development in the immediate vicinity of Parcel 9U, and, from a limited perspective, at two more distant locations, Mother's Beach and Fisherman's Village, although there are also several other high-rise buildings visible on the horizon from those locations. The Certified EIR also found cumulative impacts in conjunction with tree removals associated with the Venice Dual Force Main Project to be significant. Therefore, project-specific and cumulative visual impacts associated with the Original Project were considered significant and unavoidable in the Certified EIR.

The Original Project proposed a variety of exterior surface treatments. To reduce potential glare or reflectivity impacts, these surfaces were intended to be non-reflective or oriented in a way that would result in limited off-site glare or reflectivity impacts. To verify limiting glare and reflectivity issues, the Original Project design was reviewed and approved by the DCB, as required in the certified LCP. The Original Project's shade and shadow and light and glare impacts were considered less than significant in the Certified EIR, as were cumulative impacts with respect to these issues.

The Reduced-Scale Project: Like the Original Project, the Reduced-Scale Project will utilize a variety of exterior surface treatment that will be non-reflective or oriented in a way that would result in limited off-site glare or reflectivity impacts. To verify limiting glare and reflectivity issues, the Reduced-Scale Project design was reviewed and conceptually approved by the DCB on January, 22, 2014, as required in the certified LCP.

The impacts of the Reduced-Scale Project with respect to light and glare would, like the Original Project, be less than significant.

Like the Original Project, the Reduced-Scale Project (a) provides one percent more than the 40% required view corridor, (b) has been conceptually approved by the DCB, and (c), will implement the same mitigation measures as the Original Project, which include the following:

- A deed restriction shall be placed on the southern portion of Parcel 9U requiring that the wetland park be retained as natural open space.
- On the street level, the project landscaping, to the satisfaction of the DCB, shall be implemented to reduce visual impacts of the project when viewed from adjacent rights of way. Further, if approved by the DCB, areas of landscaping shall be included on terraces and balconies incorporated into the design of the hotel structure and associated parking structure.
- Articulation and variations in color or building materials shall be incorporated into the lower levels of the hotel and parking structure to reduce visual impacts on Via Marina.

The Reduced-Scale Project would be at a much lower maximum height (72 feet) than the Original Project (225 feet). Unlike the Original Project, the height of the Reduced-Scale Project would be similar to the height of existing and proposed development in the vicinity of Parcel 9U. The overall height and bulk of the Reduced-Scale Project is substantially less than the Original Project. The Reduced-Scale Project would represent a sizeable reduction in potential view obstruction from surrounding locations and would involve considerably less building mass. The reduced height and bulk of the Reduced-Scale Project would result in an incremental reduction in shade and shadow effects on surrounding shade-sensitive land uses.

As demonstrated in the Addendum (Addendum Figures 14-17), the Reduced-Scale Project would not result in significant shade effects on surrounding properties. As such, the Reduced-Scale Project's shade and shadow impacts would be less than the Original Project and also less than significant.

The Reduced-Scale Project's impacts with respect to views would be substantially less than the Original Project and less than significant. However, as with the Original Project, it is conservatively concluded that in conjunction with tree removals associated with the Venice Dual Force Main Project, cumulative impacts to visual character would remain significant and unavoidable.

The Reduced-Scale Project would not result in any new significant impacts and would not substantially increase the severity of any previously identified significant impacts with respect to light and glare, shade and shadows, views or visual character.

8. Traffic

a. Construction Traffic

The Original Project: As discussed in the Certified EIR, short-term traffic impacts would occur throughout construction activities for the Original Project. Construction on four individual sites was considered in the Certified EIR – Parcel 14, Parcel 10R, Parcel 9U (hotel) and Parcel 9U (Wetland Park). The construction on each of the four sites was assumed to be independent, but adjacent to each other and with overlapping time periods. The Original Project would be required to obtain building permits and other construction period permits (e.g. haul route approvals by Departments of Public Works and Regional Planning) for this construction activity. The impacts of the construction would be minimized by conditions placed upon these permits. Additionally, Worksite Traffic Control Plans will be developed and approved for activities in the public rights-of-way to assure that construction activity does not unduly interfere with traffic on the adjacent public roadways. The Certified EIR included a worst case analysis of concurrent construction Parcels concluded that the Original Project's short-term traffic impacts during the construction period would not be significant with the implementation of haul route approvals and Worksite Traffic Control Plans.

The Reduced-Scale Project: Short-term traffic impacts would occur throughout construction activities, but the duration of such impacts would be incrementally reduced under the Reduced-Scale Project based on the reduced development square footage. Moreover, the Reduced-Scale Project would also reduce the amount of excavated and exported soil from approximately 44,000 cubic yards (cy) cut (42,200 cy exported) to approximately 30,000 cy cut (28,000 cy exported). The reduction in the amount of excavated and exported soil would reduce overall haul truck trips. As with the Original Project, the County will require the Reduced-Scale Project to obtain building permits and other construction period permits (e.g. haul route approvals by Departments of Public Works and Regional Planning) for this construction activity. Additionally, Worksite Traffic Control Plans will be developed and approved for activities in the public rights-of-way to assure that construction activity does not unduly interfere with traffic on the adjacent public roadways. Therefore, like the Original Project, Reduced-Scale Project's short-term traffic impacts during the construction period would not be significant

The extent to which the Reduced-Scale Project involves concurrent construction with the other three sites is addressed by the Certified EIR. Therefore, the construction impacts were considered in a single analysis. As discussed in the Certified EIR, during much of the construction period, the short-term trip generation for the four combined sites would be much lower than that analyzed for the long-term traffic impacts of the completed project, of which the Original Project is a part. Overall projected peak level of construction activity during the Spring through Fall of 2012 (as analyzed in the Certified EIR), would remain the peak construction level of traffic during the Reduced-Scale Project's revised construction schedule beginning in April 2015, through build-out of May 2017, the total construction generation would remain below the analyzed level for the completed project on a daily basis, as well as during both peak hours. Therefore, as with the Original Project, the cumulative impacts of the Reduced-Scale projects and development of the other three sites would be less than significant

While not required for implementation of the Reduced-Scale Project, it is possible that water lines may be installed on Via Marina and extending into Parcel 9U during the project construction period. This water line installation may need approximately 6–8 weeks to complete.

This installation, a component of the Marina del Rey water infrastructure improvement, will require that one lane be closed during off-peak hours along this roadway. However, all lanes would remain open during peak time periods (7:00–9:00 AM and 4:00–6:00 PM) and at least one travel lane in each direction would remain open at all times. The construction would be required implementation of a Worksite Traffic Control (WTC) Plan, as mentioned earlier, for work within the right-of-way. Therefore, there will be no significant cumulative impacts if the Reduced-Scale Project is under construction at the same time as this waterline installation.

In addition to the infrastructure improvements, there exists the possibility for the Venice Dual Force Sewer Main upgrade to be under construction while the Reduced-Scale Project is under demolition or construction. These simultaneous construction activities could cause access disruption along both Via Marina and Marquesas Way. While inconvenient, this is not considered a significant impact because it would be a relatively short duration and haul trucks would use the roadways during off peak times, as would be required under a traffic construction management plan.

The Reduced-Scale Project would not result in any new significant impacts and would not substantially increase the severity of any previously identified significant impacts with respect to construction traffic.

b. Operational Traffic

The Certified EIR analyzed the Original Project's operational traffic impacts and concluded that upon implementation of the identified mitigation measures all project-specific traffic impacts of the Original Project would be reduced to less than significant. The Certified EIR also concluded that the cumulative impacts of the Original project in conjunction with related projects can be reduced with implementation of available cumulative mitigation measures; however, cumulative operational traffic impacts would remain significant and unavoidable. Crain & Associates (Crain), the independent traffic expert that performed the original 2007 study for the Certified EIR, conducted a supplemental analysis to determine whether the prior analysis adequately reflected the Reduced-Scale Projects traffic impacts. LACDPW, using its independent judgment, reviewed and approved this supplemental analysis, which is summarized below.

i. Baseline

Traffic counts to establish current traffic conditions were conducted in November 2013 for the AM and PM peak periods for a subset of the 17 study intersections analyzed in the December 2007 traffic study. The subset was selected to be representative of the full study area, while not including intersections affected by the temporary ongoing construction activities in Marina del Rey. Therefore, to assess if traffic may have shifted from Admiralty Way to other Marina del Rey roadways, current traffic volume data were collected at eight of the study intersections located on the periphery of the study area. The eight locations were selected in consultation with County staff and included the most northerly, southerly, easterly, and westerly study intersections included in the December 2007 traffic study. The 2013 existing traffic volumes (58,457) were compared to the existing traffic volumes reported in the December 2007

study (59,075). The total of the current AM and PM peak-hour counts from 2013 is slightly lower (-618) than the traffic volumes used in the December 2007 traffic study. Based on the comparison, the baseline traffic conditions analyzed in the December 2007 traffic study still adequately describe current traffic conditions in 2013.

ii. Project Features

There has been little change to the Parcel 9U existing use or project description since the December 2007 traffic study, and the minor changes were determined not to affect the Project trip generation or distribution. The Reduced-Scale Project includes the same number of hotel rooms and accessory uses as the Original Project. Under the Original Project, however, the 288 rooms were planned to be composed of 152 conventional hotel suites and 136 timeshare suites under the Original Project. Under the Reduced-Scale Project, the 288 hotel guestrooms are now intended to be hotel rooms only, with no timeshares. The certified LCP's trip rates specific to the Marina del Rey community used for the hotel land use in the December 2007 traffic study, and still applicable today, do not distinguish between conventional hotel suites and timeshare suites; further, the Reduced-Scale Project would include a considerable reduction in hotel-related ancillary uses (e.g., restaurant, bar/lounge, meeting rooms, etc.) such that trips associated with these components would be substantially reduced relative to the Original Project. No additional land-use changes to the development programs for Parcel 10R and Parcel 14 have been proposed. Therefore, the trip generation estimate for the Reduced-Scale Project remains the same as that analyzed for the Original Project in the December 2007 traffic study.

Additionally, the Reduced-Scale Project's access plan is unchanged from that of the Original Project analyzed in the December 2007 traffic study, in terms of the number and general location of driveways. Since the Reduced-Scale Project's land-use categories and access are the same as previously analyzed, it was assumed that the Project trip distribution patterns would remain as analyzed. Thus, the Original Project analyzed in the December 2007 traffic study still adequately describes the currently proposed Reduced-Scale Project in 2013 for traffic impact purposes.

iii. Cumulative Traffic Growth

In order to estimate future traffic volumes at the study intersections, two components of cumulative traffic growth were utilized in the December 2007 traffic study: ambient traffic growth and related project traffic growth. An annual traffic growth factor of 0.6 percent, compounded annually, was first conservatively applied to existing (2007) baseline traffic volumes for the six-year increment between the existing and Project build-out years in order to develop future baseline traffic volumes. Secondly, the traffic volumes associated with related projects within an approximate three-mile radius of the Project site were superimposed on these future baseline traffic volumes. Listings of potential related projects were obtained from the Los Angeles County Department of Regional Planning, Los Angeles County Department of Beaches & Harbors, City of Los Angeles Department of Transportation, City of Santa Monica, and City of Culver City.

In order to determine if the level of cumulative traffic growth analyzed in the December 2007 traffic study was adequate relative to 2013 traffic conditions, Crain compared the ambient traffic growth factor and related projects trip generation values. Since the 2007 study, the LACDPW has determined that the application of an ambient traffic growth factor is no longer appropriate. Rather, the Department concluded that cumulative traffic volume growth is more accurately represented by the anticipated traffic from the proposed, planned, and under construction development projects that constitute the related projects database used in their traffic impact studies. Crain developed a current related projects database was developed. The related projects analysis used the same three-mile radius around the Project site in order to provide a direct comparison between 2007 and 2013 conditions.

A related project trip generation comparison of 2007 and 2013 conditions was performed. The current related projects would generate fewer trips than the related projects identified in the December 2007 traffic study (94,062 versus 46,699), independent of the Reduced-Scale Project. Thus, the future conditions analyzed in the December 2007 traffic study are conservative in light of currently anticipated cumulative traffic growth.

iv. Project Specific Mitigation

Crain reviewed current field conditions and the Circulation section of the Marina del Rey Land Use Plan (February 8, 2012) and consulted with LACDPW to determine if the Project-specific mitigation measures proposed in the December 2007 traffic study are still available and feasible. The following is a summary of the current availability/feasibility of the recommended Project-specific mitigation measures:

- Admiralty Way and Via Marina – The proposed mitigation, consisting of providing triple westbound left-turn lanes on Admiralty Way and two eastbound departure lanes on Admiralty Way with a right-turn merge lane from northbound Via Marina, is still identified as a Category 1 improvement in the Marina del Rey Specific Plan Transportation Improvement Plan (TIP). These improvements have not already been implemented and are being assessed along with the Category 3 improvement of reconstructing the intersection, with Admiralty Way and the Via Marina south leg becoming a continuous loop through roadway, in order to determine a preferred alternative.

- Washington Boulevard and Via Marina/Ocean Avenue – The proposed mitigation consisted of improving traffic flow through the intersection by improving the nearby intersection of Washington Boulevard and Palawan Way. This improvement would provide additional egress from Marina del Rey and thus reduce traffic volumes on Via Marina. The improvements consisted of signalizing the intersection of Washington Boulevard and Palawan Way, while providing dual northbound left-turn lanes on Palawan Way. Although not included in the Marina del Rey TIP, this improvement is still available for implementation.

- Lincoln Boulevard and Mindanao Way – The proposed mitigation consisted of widening the west side of Lincoln Boulevard and relocating the median island in order to provide an exclusive northbound right-turn-only lane on Lincoln Boulevard. This improvement, identified in the Marina del Rey TIP as a Category 1 improvement, was completed. Reanalysis of this location assuming the current geometric/signal configuration demonstrated that the Project would no longer have a significant traffic impact at this location.

- Admiralty Way and Mindanao Way – The proposed mitigation consisted of installing dual southbound left-turn lanes on Admiralty Way and modifying the traffic signal to provide right-turn overlap phasing for the Mindanao Way westbound approach. The dual southbound left-turns were previously approved as part of the LACDPW Admiralty Way Street Improvement project and were in the process of being installed at the time of preparation of the Supplemental TIA. The westbound right-turn overlap phasing, however, was implemented. Reanalysis of this location assuming the current geometric/signal configuration showed that the presence of westbound right-turn overlap phasing does not eliminate the Project's significant traffic impact under the Future With Project condition, but the available dual southbound left-turn mitigation would reduce the Project's impact to a less-than significant level.

v. Operational Traffic Impacts

The traffic analysis confirmed the following regarding the December 2007 traffic study for the proposed Project:

- The baseline traffic conditions analyzed in the December 2007 traffic study still adequately describe existing traffic conditions as described in the January 9, 2014 Supplemental TIA.

- The Project description analyzed in the December 2007 traffic study adequately describes the currently proposed Project for traffic impact purposes.

- The future conditions estimated in the December 2007 traffic study are conservative in light of currently anticipated cumulative traffic growth and current County guidelines.

- As with the Original Project, all of the Reduced-Scale Project-specific impacts can be reduced to less-than-significant levels with available and feasible mitigation measures; however, as with the Original Project significant impacts would remain, if implementation of the prescribed mitigation measures is delayed or the measures are not implemented.

- As with the Original Project, cumulative impacts of the Reduced-Scale Project and related projects can be reduced with implementation of available cumulative mitigation measures; however, as with the Original Project, cumulative operational traffic impacts would remain significant and unavoidable. The Reduced-Scale Project would have significant cumulative impacts at the exact same intersections as the Original Project.

The December 2007 traffic study is conservative and valid for determining the traffic impacts of the Reduced-Scale Project. As such, the Reduced-Scale Project would not result in any new significant impacts or increase the severity of impacts already identified in the Certified EIR.

vi. Parking Impacts

The Original Project: The Certified EIR determined that the Original Project would have a less than significant impact with regard to parking supply based on the conclusions of a Project-specific shared parking analysis that determined a peak parking demand of 345 spaces, which would be exceeded by the 360 on-site spaces provided.

The Reduced-Scale Project: The Reduced-Scale Project would not trigger the need for a shared parking analysis, as the on-site parking supply of 231 spaces (212 for hotel uses and 21 for the previously approved Wetland Park) would exceed the County Code parking requirement of 165 spaces, inclusive of parking to serve the hotel uses (144 spaces required) and the previously approved Wetland Park (21 spaces required; these parking spaces would be provided as four self-park surface spaces and 17 valet spaces within the parking garage).

The Reduced-Scale Project would not result in any new significant impacts or increase the severity of impacts already identified in the Certified EIR with regard to parking supply.

9. Sewer Service

The Original Project: With mitigation, the Certified EIR concluded the Original Project would not significantly impact sewer services during construction or operation. The Certified EIR also determined the Original Project's cumulative impacts to sewer service to be less than significant.

The Reduced-Scale Project: The Reduced-Scale Project would involve similar construction activity and during operation would generate less wastewater than the Original Project, due to the elimination or reduction in the amount of certain uses that are ancillary to the hotel use. The Reduced-Scale Project would result in an overall decrease of 7,637 square feet in ancillary hotel uses (e.g., restaurant, meeting space, bar/lounge, etc.) compared to the Original Project, from 21,436 square feet to 13,799 square feet, which is primarily due to the elimination of ballroom and spa facilities under the Reduced-Scale Project. It would also implement the same mitigation measures as the Original Project.

The Reduced-Scale Project would have the same or lesser impacts regarding sewer service as the Original Project, including project-specific and cumulative impacts, and will have a less than significant impact.

10. Water Service

The Original Project: With mitigation, the Certified EIR concluded the Original Project would not significantly impact water service during construction or operation. The Certified EIR also determined the Original Project's cumulative impacts to water service to be less than significant.

The Reduced-Scale Project: The Reduced-Scale Project would involve similar construction activity and during operation would consume less water than the Original Project, due to the elimination or reduction in the amount of certain uses that are ancillary to the hotel use. The Reduced-Scale Project would result in an overall decrease of 7,637 square feet in ancillary hotel uses (e.g., restaurant, meeting space, bar/lounge, etc.) compared to the Original Project, from 21,436 square feet to 13,799 square feet, which is primarily due to the elimination of ballroom and spa facilities under the Reduced-Scale Project. As a result of the Reduced-Scale Project hotel room selection, the Reduced-Scale Project would result in at least 1,360 gallons per day of reduced water demand (approximately 1.5 acre-feet per year in water savings). It would also implement the same mitigation measures as the Original Project.

The Reduced-Scale Project would have the same or lesser impacts regarding water service as the Original Project, including project-specific and cumulative impacts.

Although California is currently experiencing extended drought conditions, water supplies to the Marina del Rey Water System are provided by the Metropolitan Water District of Southern California, which has various mechanisms in place to ensure that adequate water deliveries are provided to meet ongoing demands within its service area, even through multiple-dry years (as set forth in MWD's 2010 Regional Urban Water Management Plan). Moreover, the County's 2010 Urban Water Management Plan for Los Angeles County Waterworks District No. 29, Malibu and the Marina del Rey Water System concludes that there will be sufficient water supplies to meet projected demand in Marina del Rey through 2035, even in single and multiple dry years. The Reduced-Scale Project will have a less than significant impact.

11. Solid Waste

The Original Project: The Certified EIR determined that construction and operation of the Original Project would generate an increase in demand for solid waste collection services in the County. While there is currently sufficient landfill capacity to accommodate solid waste generated by the Original Project, an adequate supply of landfill space in the County has not yet been approved for beyond 2017. As a result, the Certified EIR found that the Original Project and cumulative projects could contribute to a decline in landfill capacity, resulting in a significant impact, unless additional landfill space or other disposal alternatives are approved.

There are no known mitigation measures that would mitigate these potentially project-specific and cumulative significant impacts of the Original Project to a less than significant level. Therefore, the Certified EIR conservatively concluded that the Original Project would result significant solid waste impacts even with the implementation of mitigation measures.

The Reduced-Scale Project: The Reduced-Scale Project would involve similar construction activity and during operation would generate less solid waste than the Original Project, due to the elimination or reduction in the amount of certain uses that are ancillary to the hotel use. It would also implement the same mitigation measures as required by the Original Project.

The Reduced-Scale Project design would have the same or lesser impact in association with solid waste, and project-specific impacts in this regard would be less than significant. However, a significant cumulative impact is conservatively concluded for the Reduced-Scale Project, same as the Original Project.

12. Education

The Original Project: The Certified EIR found that construction and operation of the Original Project would not increase the number of students attending local schools. Nonetheless, the Los Angeles Unified School District ("LAUSD") assesses a non-residential school impact fee of $0.47 per square foot to account for indirect population growth associated with commercial and industrial projects. With payment of requisite school impact fees to LAUSD, there would be no impact to education services, and cumulative impacts would also be less than significant.

The Reduced-Scale Project: Like the Original Project, the Reduced-Scale Project would not directly increase the number of students attending local schools, but would be required to pay school impact fees for non-residential development, in order to offset indirect population growth and associated student generation.

With payment of requisite LAUSD fees, the Reduced-Scale Project's impact with respect to schools would be the same as the Original Project and, like the Original Project, would have no impact.

13. Police Protection

The Original Project: With mitigation, the Certified EIR determined the Original Project would not significantly impact police protection services for the Project site during construction or operation. The County Sheriff's Department could see an increase in demand for police protection services. However, the additional revenues generated by the Original Project and the related projects will enable the County to increase police protection, as needed, to reduce the potential impacts to less than significant levels. Cumulative impacts were also determined in the Certified EIR to be less than significant.

The Reduced-Scale Project: The Reduced-Scale Project would involve generally the same construction activities and would have the same number of hotel rooms (288 guestrooms

would be developed). It would also implement the same mitigation measures as required of the Original Project.

The Reduced-Scale Project will have a less than significant impact, and its contribution to cumulative impacts would not be considerable.

14. Fire Protection

The Original Project: With mitigation, the Certified EIR determined the Original Project would not significantly impact fire protection services for the Project site during construction or operation. The County Fire Department could see an increase in the demand for fire protection services. However, the Certified EIR concluded that implementation of the recommended mitigation measures would mitigate fire protection-related impacts to less than significance. Cumulative impacts were also determined in the Certified EIR to be less than significant.

The Reduced-Scale Project: The Reduced-Scale Project would involve generally the same construction activities and would have the same number of hotel rooms. It would also implement the same mitigation measures as required of the Original Project.

The Reduced-Scale Project, like the Original Project, would have a less than significant impact, and its contribution to cumulative impacts would not be considerable.

15. Libraries

The Original Project: The Certified EIR determined the Original Project would not impact the library serving the Project site during operation. The Lloyd Taber – Marina del Rey Library would not be expected to see an increase in demand for services. Cumulative impacts were also determined in the Certified EIR to be less than significant.

The Reduced-Scale Project: Like the Original Project, the Reduced-Scale Project would not include any land uses that could increase demand for library services.

The Reduced-Scale Project would have the same impact on libraries as the Original Project and can be concluded as having no impact. The Reduced-Scale Project's contribution to cumulative impacts would not be considerable.

16. Parks and Recreation

The Original Project: The Certified EIR determined the Original Project would not displace existing or proposed public parkland, nor create a new demand on parkland use. The creation of the wetland and upland park on Parcel 9U would increase the amount of public parkland. Therefore, no impacts to parks and recreation would occur. Cumulative impacts were also determined in the EIR to be less than significant.

The Reduced-Scale Project: Like the Original Project, the Reduced-Scale Project would not include any land uses that could increase demand for parks and recreation and would fund a portion of the Wetland Park on the balance of Parcel 9U.

The Reduced-Scale Project, like the Original Project, would have no impact on parks and recreation. The Reduced-Scale Project's contribution to cumulative impacts would not be considerable.

17. Population and Housing

The Original Project: The Certified EIR determined construction of the Original Project would not increase area population or create a demand for housing. The Original Project would not significantly impact population or housing in the Westside Cities subregion, or result in make a considerable contribution to cumulative population or housing impacts because it would not add any permanent population.

The Reduced-Scale Project: The Reduced-Scale Project would generally include the same or reduced land uses as the Original Project.

The Reduced-Scale Project would have the same or lesser impact regarding population and housing as the Original Project, and have a less than significant project-specific impact.

Because the Reduced-Scale Project would not add any permanent population and, therefore, would not have the potential to have significant population and housing impacts, the Reduced-Scale Project would not contribute to a significant cumulative impact with respect to population and housing.

18. Land Use and Planning

The Original Project: As indicated in the Land Use and Planning section of the Certified EIR, the Original Project was determined to be consistent with land use policies defined in the Marina del Rey LUP. Therefore, project impacts on the land use environment were not considered significant, but the Original Project would contribute to a significant unavoidable cumulative impact, for which there are no known mitigation measures capable of reducing this cumulative impact to a less than significant level.

The Reduced-Scale Project: The Reduced-Scale Project involved the same or similar land uses as the Original Project.

The Reduced-Scale Project in conjunction with other reasonable foreseeable development would have the same or lesser impact in association with land use and planning and can also be concluded as having a less than significant impact at the project level, but would still contribute to a significant unavoidable cumulative impact, for which there are no known mitigation measures capable of reducing this cumulative impact to a less than significant level.

19. Same Unavoidable Significant Impacts As The Original Project

The Certified EIR concluded that the Original Project would generate unavoidable significant impacts in the following environmental impact areas:

- noise (short-term construction-related noise and vibration and cumulative noise and vibration);
- air quality (short-term construction-related air quality for NOX, and localized PM_{10}, $PM_{2.5}$ and NO_2 and cumulative construction air quality);
- visual resources (project-specific and cumulative visual character);
- cumulative construction-related and operational traffic;
- cumulative operational solid waste disposal;
- cumulative population and housing growth; and
- cumulative land use and planning.

The Reduced-Scale Project will generate the same or reduced unavoidable significant impacts as the Original Project. The Reduced-Scale Project would not result in any new unavoidable significant impacts and would not substantially increase the severity of any previously identified unavoidable significant impacts.

20. Independent Judgment

The Applicant's consultants prepared the screencheck versions of the Addendum and prepared technical reports and memoranda. All such materials and all other materials related to the Addendum were extensively reviewed and, where appropriate, modified by the County Department of Regional Planning. As such, the Addendum and all other related materials reflect the independent judgment and analysis of the Lead Agency.

21. Substantial Evidence

The Commission finds and declares that substantial evidence for each and every finding made herein is contained in the Certified EIR, the Addendum, technical reports and memoranda referenced therein and herein, and other related materials, each of which are incorporated herein by this reference. Moreover, the Commission finds that where more than one reason exists for any finding, the Commission finds that each reason independently supports such finding, and that any reason in support of a given finding individually constitutes a sufficient basis for that finding.

22. Relationship of Findings to Certified EIR and Addendum

These Findings are based on the most current information available. Accordingly, to the extent there are any apparent conflicts or inconsistencies between the Certified EIR and Addendum, on the one hand, and these Findings, on the other, these Findings shall control and the Certified EIR and Addendum or both, as the case may be, are hereby amended as set forth in these Findings.

23. Project Conditions of Approval

The mitigation measures set forth in the Certified EIR as applicable to the Reduced-Scale Project shall also be incorporated into and made conditions of the Reduced-Scale Project to be monitored and enforced by the County Departments and/or other responsible agencies pursuant to the building permit process and the Mitigation Monitoring Program. To the extent feasible and applicable, each of the other findings and conditions of approval made by or adopted by the Commission in connection with the Original Project are also incorporated herein by this reference.

24. Custodian of Documents

The custodian of the documents or other material which constitutes the record of proceedings upon which the Commission's decision is based is the Los Angeles County Department of Regional Planning located at 320 West Temple Street, 13th Floor, Los Angeles, California 90012.

IV. ADOPTION OF THE ADDENDUM

Findings. Pursuant to CEQA Guidelines Sections 15163 and 15164, as well as CEQA Section 21166, and based upon the substantial evidence set forth in the administrative record and summarized herein, the Commission now adopts the October 2014 Addendum to the Certified EIR, and finds:

A. Substantial evidence in the administrative record shows the Reduced-Scale Project necessitates minor technical changes or additions to the previously-certified EIR, but that none of the conditions described in CEQA Guidelines Section 15162 calling for the preparation of a subsequent EIR have occurred.

B. Substantial evidence in the administrative record shows that no substantial changes are proposed in Reduced-Scale Project which will require major revisions of the Certified EIR.

C. Substantial evidence in the administrative record shows that no substantial changes will occur with respect to the circumstances under which the Reduced-Scale Project is being undertaken which will require major revisions in the Certified EIR.

D. Substantial evidence in the administrative record shows that no new information, which was not known and could not have been known at the time the Final EIR was certified as complete, has become available:

   i. The Reduced-Scale Project will not have one or more significant effects not discussed in the previous Final EIR;

   ii. Significant effects previously examined in Final EIR will not be substantially more severe than shown in the previous Final EIR;

   iii. No mitigation measures or alternatives previously found not to be feasible have been identified as now, in fact, to be feasible and would substantially reduce one or more significant effects of the project; and

   iv. No mitigation measures or alternatives which are considerably different from those analyzed in the previous Final EIR have been identified that would substantially reduce one or more significant effects on the environment.

E. Substantial evidence in the administrative record shows none of the conditions described in CEQA Guidelines Section 15162 calling for the preparation of a subsequent EIR have occurred.

F. The Addendum included an adequate explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 and is supported by substantial evidence.

G. None of the public comments to the Addendum or elsewhere in the administrative record constitute substantial evidence that would require preparation of a supplemental or subsequent EIR or that would require substantial revision of the previously-certified Final EIR.

As summarized in Addendum Section I, Purpose of Addendum and CEQA Requirements, and further analyzed in greater detail in Addendum Section IV, Environmental Impact Analysis, the changes proposed to the Original Project reduce the intensity of development in many ways and are minor. The changes would not result in any new significant environmental impacts or substantially increase the intensity of the severity of previously identified significant effects. The analysis contained in the Addendum demonstrates that the Reduced-Scale Project is consistent with the size, scale, and massing of the Original Project and the impact issues previously examined in the Certified EIR remain unchanged with the proposed modifications.

Kevin Finkel

From: MARLA HUNTER [marlahunter@msn.com]
Sent: Monday, July 13, 2015 8:39 PM
To: Kevin Finkel
Subject: Project No. TR067861-(4)

Dear Mr. Finkel-

I am writing on behalf of myself and other homeowners at the Marina Colony Strand building located at 4200 Via Dolce, Marina del Rey. Our building is located directly across the street from the proposed building. I purchased my unit in January 2015 and during that time could find no posted or recorded plans of this proposed build. My unit, as well as many others have a direct view of the Marina. Putting a six story building right in front of us would not only cause considerable traffic and noise issues, but would completely block (actually obliterate) all of our views and negatively impact our property value. A building of this height seems completely unreasonable and inappropriate for the area.

We will definitely be attending the hearing on July 22 but would appreciate any information on what we can do to be heard and considered on this issue.

Sincerely,

Marla Hunter
4200 Via Dolce #332
Marina del Rey, CA 90292
310-447-4368

From: nancy cotner
To: Kevin Finkel
Subject: #TR067861 PROJECT CONCERNS
Date: Wednesday, July 15, 2015 3:17:14 PM

PROJECT # TR067861 MARRIOTT CONSTRUCTION ON VIA MARINA IN MARINA DEL REY

PEDESTRIAN ACCESS
It appears you have neglected to include any discussion of effects on pedestrians during this project's construction.
Please do not eliminate our walking access along the water on the east side of the property as you have done during the current construction on Via Marina between Marquesa and Panay Way. Not only are we unable to walk along the water but the construction fences narrow the sidewalk along Via Marina so much that it is awkward for two people to pass. This makes it very difficult to walk north on Via Marina to get to Mother's Beach and the restaurants in the area.
Please address this issue in your final document.

PUBLIC WETLAND PARK
This is not described in the document filed at the library except to mention a separate permit. How do we find the project description and environmental analysis? What is the planned completion date?

PUBLIC HEARING JULY 22, 2015
Please have the courtesy to conduct a hearing in the local area instead of 9am in downtown making it difficult for most of us to attend.

Thank you.
Nancy Cotner