

Reference: 2176 Kittredge Street Mixed-Use Project CEQA Documentation

Description and traffic modeling outputs. Thus, Stantec conservatively prepared the December 2018 air quality modeling using the trip generation counts resulting from 170 units and 30,000 square feet of retail, as presented in the December 2018 traffic modeling. As indicated in the 2018 CEQA Exemption, implementation of the proposed project would not result in new significant or substantially greater impacts related to air quality that were not identified in the 2009 Downtown Area Plan EIR.

Noise Analysis: Long-term operation of the proposed project would generate less traffic than the existing gas station. While the proposed project consists of 160 residential units above 24,049 square feet of retail space, the Traffic Study memorandum, prepared by Stantec, conservatively contemplated 170 residential units above 30,000 square feet of retail space and shows a net decrease of traffic counts. Therefore, noise associated with traffic would be reduced with the development of the proposed project. Estimated noise levels resulting from the development of the proposed project would be similar to existing conditions and typical of residential and commercial uses (e.g., landscape maintenance, waste collection, and people congregating and talking at the community gathering areas). Implementation of the proposed project would not result in new significant or substantially greater impacts related to air quality that were not identified in the 2009 Downtown Area Plan EIR.

February 2019 Revised Project Description

From the time the 2018 CEQA Exemption was prepared to the time of the project application submittal in February 2019, the proposed project was revised to consist of 165 residential units and 23,000 square feet of retail (a difference of an additional five residential units and a reduction of approximately 1,000 square feet of retail).

Given that the December 2018 traffic analysis, air quality analysis, and noise analysis were prepared based on the traffic modeling outputs using conservative values (170 residential units and 30,000 square feet of retail) greater than the February 2019 revised project design (165 units and 23,000 square feet of retail, respectively), Stantec does not anticipate changes in impact conclusions and level of significance of impacts resulting from the five additional residential units and the reduction of approximately 1,000 square feet of retail.

The Land Use, Population and Housing, Public Services, and Utilities and Service Systems resource sections of the 2018 CEQA Exemption were prepared assuming 160 residential units and 24,049 square feet of retail. As such, the Downtown Area Plan EIR determined respective impacts would be less than significant and no mitigation measures were identified (Land Use, Population and Housing, and Public Services) or the Downtown Area Plan provided mitigation measures to reduce potential impacts to a level of less than significant (Utilities and Service Systems).

The project site is contained within the development program envisioned by the Downtown Area Plan. The project site is identified as an opportunity site in the Downtown Area Plan Outer Core area and designated for mixed-use development. As such, while public services and utility and service system demands would increase slightly from the additional five residential units, Stantec does not anticipate changes in impact conclusions and level of significance of impacts resulting from the five additional units and the reduction of approximately 1,000 square feet of retail, given the project site is identified as an opportunity site.

Based on the Project Description History above, Stantec believes the December 2018 CEQA Exemption Documentation Package to have adequately analyzed the February 2019 revised project design and that the

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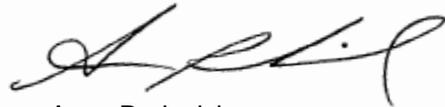
proposed modifications in the application would not result in an increase in severity of impact that was not otherwise already accounted for.

Our goal is to provide legally defensible environmental compliance services related to the 2176 Kittredge Street Mixed-Use Project; as such, we encourage you to contact us if you have any questions or concerns related to the outlined Project Description History discussed above. Should you need additional information regarding this submittal please do not hesitate to contact us.

Respectfully,



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