

III. RESPONSES TO WRITTEN COMMENTS ON THE DRAFT EIR

A. INTRODUCTION

According to the *California Environmental Quality Act (CEQA) Guidelines*, Section 15132, the Final EIR shall consist of the following items: (a) The Draft EIR or a revision of the Draft, (b) Comments and recommendations received on the Draft EIR, (c) A list of persons, organizations and public agencies commenting on the Draft EIR, (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process, and (e) Any other information added by the Lead Agency. Item (a) is provided as **Section II, Corrections and Additions to the Draft EIR**, of this document.

The Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and circulated for public review beginning Friday, August 29, 2008, and ending on Tuesday, October 14, 2008. The Draft EIR was circulated for a 46-day public review period, which exceeded by one day the 45-day review period as required by the *State CEQA Guidelines* Section 15087.

A total of 31 comment letters were received. A list of Commenters is provided below. The comment letters have been numbered and organized into the following categories: **State Agencies; Regional Agencies, City of Los Angeles Agencies; Homeowners Associations, Private and Local Organizations; and Individuals**. To provide a summary of the comments received, **Table III-1** lists the comment letters and identifies the issues raised in each.

The original comment letters with individual comments bracketed and numbered are provided, followed by numbered responses to each bracketed comment. Individual comments within each letter are numbered and the corresponding response is given a matching number. Where responses result in a change to the Draft EIR, it is noted, and the resulting change is identified in **Section II, Corrections and Additions to the Draft EIR**. Clean copies of the original letters, including any attachments, are provided in **Appendix A** of this Final EIR.

B. LIST OF PUBLIC AGENCIES AND PRIVATE PARTIES COMMENTING ON THE WILSHIRE AND LA BREA DRAFT EIR

State Agencies

1. State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, October 15, 2008
2. State of California, Native American Heritage Commission, September 9, 2008

Regional Agencies

3. Metropolitan Transportation Agency, October 13, 2008

City of Los Angeles Agencies

4. City of Los Angeles, Bureau of Sanitation, Wastewater Engineering Services Division, September 23, 2008

Homeowners Associations

5. Miracle Mile Residential Association, October 14, 2008

Private Organizations

6. Miracle Mile Players, October 10, 2008
7. Art Deco Society of Los Angeles, October 13, 2008
8. Kramer Law Group, October 13, 2008
9. Miracle Mile Chamber of Commerce, October 13, 2008
10. Los Angeles Conservancy, October 17, 2008

Individuals

11. Zachary Shepard, September 2, 2008
12. Myrna Dwyer, October 9, 2008
13. Matt Tenggren, October 9, 2008
14. John G. Huffman, October 11, 2008
15. Joan Jakubowski, October 11, 2008

III. Responses to Written Comments on the Draft EIR

16. Sung W. and Nancy Park, October 12, 2008
17. Jenna Petne, October 12, 2008
18. Ed Rubrico, October 12, 2008
19. Susan Baker, October 13, 2008
20. Felicia Filer, October 13, 2008
21. Elizabeth Fuller, October 13, 2008
22. Glenn Han, October 13, 2008
23. Dan Kegel, October 13, 2008
24. Mohsen Movaghar, October 13, 2008
25. Lori Nakama, October 13, 2008
26. Muriel Rothenberg, October 13, 2008
27. Ronald and Nancy Sakall, October 13, 2008
28. Devy Schonfeld, October 13, 2008
29. Matt Tenggren, Frocie M. Liwanag, Mayoni L. Scanlon, October 13, 2008
30. Brent Winn, October 13, 2008
31. Helen H. Nakama, October 13, 2008

**Table III-1
Comments on Draft EIR**

Summary of Comments Wilshire and La Brea Project CEQA Environmental Review Process	Project Description	Visual Resources	Air Quality	Cultural Resources	Geology	Hazards and Hazardous Materials	Hydrology and Water Quality	Land Use	Noise	Population and Housing	Public Services	Transportation	Public Utilities	Growth Inducement	Project Alternatives	Other	Explanation of "Other"	
State Agencies																		
1. State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, October 15, 2008																	X	City has complied with State Clearinghouse review requirements
2. State of California, Native American Heritage Commission, September 9, 2008				X														
Regional Agencies																		
3. Metropolitan Transportation Agency, October 13, 2008												X						

III. Responses to Written Comments on the Draft EIR

Summary of Comments Wilshire and La Brea Project CEQA Environmental Review Process	Project Description	Visual Resources	Air Quality	Cultural Resources	Geology	Hazards and Hazardous Materials	Hydrology and Water Quality	Land Use	Noise	Population and Housing	Public Services	Transportation	Public Utilities	Growth Inducement	Project Alternatives	Other	Explanation of "Other"
City of Los Angeles Agencies																	
4. City of Los Angeles, Bureau of Sanitation, Wastewater Engineering Services Division, September 23, 2008													X				
Homeowners Associations																	
5. Miracle Mile Residential Association, October 14, 2008											X	X	X			X	Cumulative impacts
Private Organizations																	
6. Miracle Mile Players, October 10, 2008				X												X	Support for project
7. Art Deco Society of Los Angeles, October 13, 2008				X								X					
8. Kramer Law Group, October 13, 2008																X	Support for project
9. Miracle Mile Chamber of Commerce, October 13, 2008																X	Support for project
10. Los Angeles Conservancy, October 17, 2008				X											X		

III. Responses to Written Comments on the Draft EIR

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Individuals																	
11. Zachary Shepard, September 2, 2008																	Support for project
12. Myrna Dwyer, October 9, 2008		X		X				X		X	X	X					
13. Matt Tenggren, October 9, 2008												X					
14. John G. Huffman, October 11, 2008												X					
15. Joan Jakubowski, October 11, 2008										X	X	X	X				
16. Sung W. and Nancy Park, October 12, 2008	X	X							X			X				X	Widening of 8 th Street in front of their property
17. Jenna Petne, October 12, 2008												X					
18. Ed Rubrico, October 12, 2008												X					
19. Susan Baker, October 13, 2008									X	X	X	X					
20. Felicia Filer, October 13, 2008	X	X										X					
21. Elizabeth Fuller, October 13, 2008	X			X				X		X	X	X			X	X	School safety
22. Glenn Han, October 13, 2008												X					
23. Dan Kegel, October 13, 2008	X											X			X	X	Walkability of project sidewalks

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24. Mohsen Movaghar, October 13, 2008																X	On-site tenant has existing lease and requests results of soil surveys.
25. Lori Nakama, October 13, 2008	X											X					
26. Muriel Rothenberg, October 13, 2008												X					
27. Ronald and Nancy Sakall, October 13, 2008												X					
28. Devy Schonfeld, October 13, 2008	X					X			X		X	X				X	Opportunities for public comment
29. Matt Tenggren, Frocie M. Liwanag, Mayoni L. Scanlon, October 13, 2008												X					
30. Brent Winn, October 13, 2008												X					
31. Helen H. Nakama, October 13, 2008												X					



STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



ARNOLD SCHWARZENEGGER
GOVERNOR

CYNTHIA BRYANT
DIRECTOR

October 15, 2008

RECEIVED
CITY OF LOS ANGELES

OCT 21 2008

ENVIRONMENTAL
UNIT

Srimal Hewawitharana
Los Angeles City Planning Department
200 No. Spring Street, Room 750
Los Angeles, CA 90012

Subject: Wilshire and La Brea
SCH#: 2007071053

Dear Srimal Hewawitharana:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 14, 2008, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

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

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

1

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

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

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**Document Details Report
State Clearinghouse Data Base**

SCH# 2007071053
Project Title Wilshire and La Brea
Lead Agency Los Angeles, City of

Type EIR Draft EIR

Description The Wilshire and La Brea project proposes a mixed-use development consisting of 562 residential units, 45,000 square feet of ground-floor retail-commercial and restaurant uses, landscaping, lighting, utilities, and subterranean and above-grade parking. The ground-floor retail/commercial and restaurant uses would be located on Wilshire Boulevard and La Brea Avenue. Of the proposed 562 residential units, 138 would be studio units, 315 would be one-bedroom apartment units, 99 would be two-bedroom apartment units, and 10 would be two-bedroom townhome units. The proposed project would provide a total of 1,083 parking spaces. Parking would be provided in a partial above-ground "mezzanine" level, in a ground level and in a 2.5 level subterranean structure.

Lead Agency Contact

Name Srimal Hewawitharana
Agency Los Angeles City Planning Department
Phone (213) 978-1202 **Fax**
email
Address 200 No. Spring Street, Room 750
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of
Region
Lat / Long 34° 03' 43.5" N / 118° 20' 36.6" W
Cross Streets Wilshire Boulevard, La Brea Avenue

Parcel No.	Township	Range	Section	Base
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Proximity to:

Highways I-10
Airports
Railways
Waterways
Schools various LAUSD
Land Use Commercial/[Q]C4-2CDO, C2-1, [Q]C2-1/Regional Commercial, General Commercial

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Cumulative Effects; Geologic/Seismic; Growth Inducing; Landuse; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply

Reviewing Agencies Resources Agency; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Department of Housing and Community Development; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission

Date Received 08/28/2008 **Start of Review** 08/29/2008 **End of Review** 10/14/2008

Note: Blanks in data fields result from insufficient information provided by lead agency.

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
 SACRAMENTO, CA 95814
 (916) 653-4082
 (916) 657-5390 - Fax



September 9, 2008

Clear
 10-14-08
 e



Srimal Hewawitharana
 City of Los Angeles, Department of City Planning
 200 N. Spring Street, Room 750
 Los Angeles, CA 90012

RE: SCH#2007071053 Wilshire and LaBrea; Los Angeles County.

Dear Mr. or Ms. Hewawitharana:

The Native American Heritage Commission (NAHC) has reviewed the Notice of Completion (NOC) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064(b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archaeological resources, the NAHC recommends the following actions:

- ✓ Contact the appropriate regional archaeological information center for a record search. The record search will determine:
 - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological information center.
- ✓ Contact the Native American Heritage Commission for:
 - A Sacred Lands File Check. USGS 7.5 minute quadrangle name, township, range and section required.
 - A list of appropriate Native American contacts for consultation concerning the project site and to assist in the mitigation measures. Native American Contacts List attached.
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
 - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
 - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Katy Sanchez
 Katy Sanchez
 Program Analyst

CC: State Clearinghouse

Native American Contacts
 Los Angeles County
 September 8, 2008

Samuel H. Dunlap
 P.O. Box 1391
 Temecula, CA 92593
 samdunlap@earthlink.net
 (909) 262-9351 (Cell)

Gabrielino
 Cahuilla
 Luiseno

Tongva Ancestral Territorial Tribal Nation
 John Tommy Rosas, Tribal Admin.
 Gabrielino Tongva
 tattnlaw@gmail.com
 310-570-6567

Fernandeno Tataviam Band of Mission Indians
 William Gonzales, Cultural/Environ Depart
 601 South Brand Boulevard, Suite 102
 San Fernando, CA 91340
 ced@tataviam.org
 (818) 837-0794 Office
 (818) 581-9293 Cell
 (818) 837-0796 Fax

Fernandeno
 Tataviam

San Fernando Band of Mission Indians
 John Valenzuela, Chairperson
 P.O. Box 221838
 Newhall, CA 91322
 tsen2u@msn.com
 (661) 753-9833 Office
 (760) 885-0955 Cell
 (760) 949-1604 Fax

Fernandefio
 Tataviam
 Serrano
 Vanyume
 Kitanemuk

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

Gabrieleno/Tongva San Gabriel Band of Mission
 Anthony Morales, Chairperson
 PO Box 693
 San Gabriel, CA 91778
 ChiefRBwife@aol.com
 (626) 286-1632
 (626) 286-1758 - Home
 (626) 286-1262 Fax

Gabrielino Tongva

Ti'At Society
 Cindi Alvitre
 6515 E. Seaside Walk, #C
 Long Beach, CA 90803
 calvitre@yahoo.com
 (714) 504-2468 Cell

Gabrielino

Randy Guzman - Folkes
 1931 Shadybrook Drive
 Thousand Oaks, CA 91362
 ndnrandy@hotmail.com
 (805) 905-1675 - cell

Chumash
 Fernandefio
 Tataviam
 Shoshone Paiute
 Yaqui

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

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

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH# 2007071053 Wilshire and LaBrea; Los Angeles County.

Native American Contacts
Los Angeles County
September 8, 2008

Gabrielino/Tongva Council / Gabrielino Tongva Nation
Sam Dunlap, Tribal Secretary
761 Terminal Street; Bldg 1, 2nd floor Gabrielino Tongva
Los Angeles , CA 90021
office @tongvatribes.net
(213) 489-5001 - Office
(909) 262-9351 - cell
(213) 489-5002 Fax

Gabrielino Band of Mission Indians of CA
Ms. Susan Frank
PO Box 3021 Gabrielino
Beaumont , CA 92223
(951) 897-2536
(951) 768-845-3606 - FAX

Gabrielino Tongva Indians of California Tribal Council
Robert Dorame, Tribal Chair/Cultural Resources
P.O. Box 490 Gabrielino Tongva
Bellflower , CA 90707
gtongva@verizon.net
562-761-6417 - voice
562-925-7989 - fax

Gabrielino Tongva Indians of California Tribal Council
Mercedes Dorame, Tribal Administrator
PO Box 590809 Gabrielino Tongva
San Francisco , CA 94159
Pluto05@hotmail.com

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Comment Letter No. 1

October 15, 2008

Terry Roberts, Director
State of California
Governor's Office of Planning and Research, State Clearinghouse and Planning Unit
P.O. Box 3044
Sacramento, California 95812-3044

Response No. 1-1

This letter confirms that the State Clearinghouse submitted the Wilshire and La Brea Draft EIR to selected state agencies for review. The review period closed on October 14, 2008. This letter acknowledges compliance with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Comments from one state agency, the Native American Heritage Commission, were attached to the State Clearinghouse's letter. The Native American Heritage Commission's letter is included as **Comment Letter No. 2**.

STATE OF CALIFORNIA

Arnold Schwarzenegger, Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
(916) 657-5390 - Fax



RECEIVED
CITY OF LOS ANGELES

September 9, 2008

SEP 16 2008

ENVIRONMENTAL
UNIT

Srinial Hewawtharana
City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

RE: SCH#2007071053 Wilshire and LaBrea; Los Angeles County.

Dear Mr. or Ms. Hewawtharana:

The Native American Heritage Commission (NAHC) has reviewed the Notice of Completion (NOC) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064(b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archaeological resources, the NAHC recommends the following actions:

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1

Sincerely,
Katy Sanchez
Katy Sanchez
Program Analyst

CC: State Clearinghouse

Native American Contacts

Los Angeles County

September 8, 2008

Samuel H. Dunlap
P.O. Box 1391
Temecula, CA 92593
samdunlap@earthlink.net
(909) 262-9351 (Cell)

Gabrielino
Cahuilla
Luiseno

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.
Gabrielino Tongva
tattnlaw@gmail.com
310-570-6567

Fernandeno Tataviam Band of Mission Indians
William Gonzales, Cultural/Environ Depart
601 South Brand Boulevard, Suite 102
San Fernando, CA 91340
ced@tataviam.org
(818) 837-0794 Office
(818) 581-9293 Cell
(818) 837-0796 Fax

Fernandeno
Tataviam

San Fernando Band of Mission Indians
John Valenzuela, Chairperson
P.O. Box 221838
Newhall, CA 91322
tsen2u@msn.com
(661) 753-9833 Office
(760) 885-0955 Cell
(760) 949-1604 Fax

Fernandeno
Tataviam
Serrano
Vanyume
Kitanemuk

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

Gabrieleno/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693
San Gabriel, CA 91778
ChiefRBwife@aol.com
(626) 286-1632
(626) 286-1758 - Home
(626) 286-1262 Fax

Gabrielino Tongva

Ti'At Society
Cindi Alvitre
6515 E. Seaside Walk, #C
Long Beach, CA 90803
calvitre@yahoo.com
(714) 504-2468 Cell

Gabrielino

Randy Guzman - Folkes
1831 Shadybrook Drive
Thousand Oaks, CA 91362
ndnrandy@hotmail.com
(805) 905-1675 - cell

Chumash
Fernandeno
Tataviam
Shoshone Paiute
Yaqui

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This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH# 2007071053 Wilshire and LaBrea; Los Angeles County.

Native American Contacts
Los Angeles County
September 8, 2008

Gabrielino/Tongva Council / Gabrielino Tongva Nation
Sam Dunlap, Tribal Secretary
761 Terminal Street; Bldg 1, 2nd floor Gabrielino Tongva
Los Angeles , CA 90021
office @tongvatribes.net
(213) 489-5001 - Office
(909) 262-9351 - cell
(213) 489-5002 Fax

Gabrielino Band of Mission Indians of CA
Ms. Susan Frank
PO Box 3021 Gabrielino
Beaumont , CA 92223
(951) 897-2536
(951) 768-845-3606 - FAX

Gabrielino Tongva Indians of California Tribal Council
Robert Dorame, Tribal Chair/Cultural Resources
P.O. Box 490 Gabrielino Tongva
Bellflower , CA 90707
gtongva@verizon.net
562-761-6417 - voice
562-925-7989 - fax

Gabrielino Tongva Indians of California Tribal Council
Mercedes Dorame, Tribal Administrator
PO Box 5901809 Gabrielino Tongva
San Francisco , CA 94159
Pluto05@hotmail.com

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Comment Letter No. 2

September 9, 2008

Katy Sanchez, Program Analyst
State of California
Native American Heritage Commission
915 Capitol Mall, Room 364
Sacramento, California 95814

Response No. 2-1

As discussed in the Initial Study, under Cultural Resources, and in Section IV.C, Cultural Resources, of the Draft EIR, the City of Los Angeles Planning Department determined that impacts associated with archaeological resources, human remains and paleontological resources could be mitigated to a less than significant level and, therefore, limited study of these cultural resource topics is provided within the Draft EIR.

No archaeological resources are known to exist on or adjacent to the project site. Excavation for the foundations and subterranean parking levels associated with the proposed project would cause new subsurface disturbance on the project site. As the project site has been subject to past subsurface disturbance associated with grading and foundations, it is unlikely that undisturbed unique archeological resources exist on this site. Additionally, based on the historic uses of the project site, intact human remains are unlikely to be present beneath the site. Nonetheless, unanticipated discovery of unique archeological resources and accidental discovery of human remains is possible.

The Draft EIR concluded that with implementation of the recommended mitigation measures CR-1 and CR-2 (reproduced below), impacts related to archaeological resources and human remains would be reduced to a less than significant level.

MM-CR-1. If archaeological resources are uncovered on the project site during excavation, the developer must notify the Los Angeles Department of Building and Safety immediately and work must stop within a 100-foot radius until a qualified archeologist has evaluated the find. Construction activity may continue unimpeded on other portions of the project site. If the find is determined by the qualified archeologist to be a unique archeological resource, as defined by Section 2103.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2 of the Public Resources Code. If the find is determined not to be a unique archeological resource, no further action is necessary and construction may continue.

MM-CR-3. If paleontological resources are uncovered during excavation of the project site, the City of Los Angeles Department of Building and Safety must be notified immediately and work must stop within 100 feet of the find to allow a qualified paleontologist to appropriately remove the find.



Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 T
metro.net

Metro

October 13, 2008

Ms. Srimal Hewawitharana
Project Coordinator
Room 750, City Hall
Department of City Planning
200 N. Spring Street
Los Angeles, CA 90012

Dear Ms. Hewawitharana:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Wilshire and La Brea Project. This letter conveys comments and recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibilities in relation to the proposed project.

Although the traffic impact analysis in the Draft EIR satisfies the provisions of the Congestion Management Program (CMP), you should also be aware that there are a variety of important transit services in the area and future services being planned or studied that have not yet been adequately addressed in the EIR. Specifically:

1. Current bus service: Both Wilshire and La Brea Boulevards currently have very high levels of bus transit service and ridership with various bus lines that travel by and stop at or near the proposed project site. Although the Draft EIR indicates that all project construction activities are expected to occur on-site and therefore not impact any bus operations, please be advised that Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines. Metro should also be contacted if any changes to existing stops and zones are anticipated either during or after construction. Other Municipal Bus Service Operators may also be impacted and therefore should be included in the FEIR and included in construction outreach efforts.
2. Wilshire Bus Lane Project: Metro, in partnership with the City of Los Angeles, is currently moving forward with an Environmental Assessment for a federally-funded, peak period exclusive bus lane along Wilshire Boulevard within the City of Los Angeles. The bus lane is anticipated to operate in the AM and PM peak periods and prohibit general purpose traffic from using the curb lane on Wilshire Boulevard between 7:00-9:00 a.m. and 4:00-7:00 p.m. The FEIR should discuss the transit and non-transit modal share of the project in the context of mobility along Wilshire Boulevard with a potential exclusive bus lane. Please contact Metro Project Manager Martha Butler if you require further information about this project. Ms. Butler can be reached at 213-922-7651 or butterm@metro.net.
3. Crenshaw Transit Corridor Study: The proposed project site is within the study area for the Crenshaw Transit Corridor Alternatives Analysis/Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR). The Draft EIS/EIR is considering alignments for both Bus Rapid

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Transit and Light Rail Transit that could extend north along Crenshaw Boulevard and La Brea Avenue to connect with Wilshire Boulevard at the intersection of Wilshire/LaBrea. The EIR for the Wilshire and La Brea Project should acknowledge this potential transit project and incorporate a discussion of it in the FEIR. Information is available on the Metro website at http://www.metro.net/projects_studies/crenshaw/default.htm. Please contact Metro Project Manager Mr. Roderick Diaz at 213-922-3018 or diazroderick@metro.net.

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4. Westside Extension Transit Corridor Study: The proposed project site is within the study area for the Westside Extension Transit Corridor Alternatives Analysis (AA) Study. The AA study is nearing its conclusion and a full EIS/EIR may be underway by this winter. This study is evaluating a variety of east-west transit improvements including a possible subway extension with a station at the intersection of Wilshire Boulevard and La Brea Avenue. The Wilshire and La Brea Project should consider locating on the property a proposed future subway portal (escalator and elevator). Such a portal would not appear to fit on the corner of the property the way the Wilshire and La Brea Project is currently designed. Metro therefore requests that the corner of the property be re-designed to more easily accommodate the future subway portal. Such a subway portal will not fit on the existing sidewalk and will require some incursion into the private property to be used for the proposed Wilshire and La Brea Project. The project should be designed for future modification to accept a subway entrance as well as easy access to connecting bus service. Please contact Metro Project Manager David Mieger if you require further information about this project. Mr. Mieger can be reached at 213-922-3040 or miegerd@metro.net. Information about the study can be found on the Metro website at http://www.metro.net/projects_studies/westside/default.htm.

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Metro looks forward to reviewing the Final EIR. If you have any general questions regarding this response, please call me at 213-922-6908 or by email at chapmans@metro.net. Please send the Final EIR to the following address:

Metro CEQA Review Coordination
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952
Attn: Susan Chapman

Sincerely,



Susan Chapman
Program Manager, Long Range Planning

cc: Martha Butler
Roderick Diaz
Jody Feerst Litvak
Roger Martin
David Mieger

Comment Letter No. 3

October 13, 2008

Susan Chapman, Program Manager, Long Range Planning
Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, California 90012-2952

Response No. 3-1

The Metropolitan Transportation Authority (Metro) Bus Operations Control Special Events Coordinator will be contacted regarding construction activity that may impact the Metro bus lines, or if any changes to existing stops and zones are anticipated either during or after construction. The Los Angeles Department of Transportation will also be notified regarding the DASH Fairfax local service it operates in the vicinity of the project site.

Response No. 3-2

The Wilshire Bus Lane project being considered would be the conversion of the existing Wilshire Boulevard curb-lane to an exclusive bus only lane during the morning and evening rush hours. The end-to-end project area would include portions of Wilshire Boulevard from west of the 110 Freeway to the Santa Monica City limits excluding the City of Beverly Hills.

Ridership is estimated in person trips, rather than vehicle trips, which were the basis of the analysis used in the Draft EIR. The Wilshire and La Brea Project is estimated to generate approximately 6,700 daily person trips, with 350 and 600 morning and afternoon peak hour person trips respectively. The LADOT Wilshire Boulevard Bus Lane – Council File 03-2337-S1 report indicates that the peak hour Wilshire Boulevard Bus lane project could achieve a 10 percent mode shift of drivers to transit. Using this potential transit mode split in lieu of the CMP mode split (7 percent commercial and 5 percent residential mode split from the transit impact analysis procedures, Section D.8.4 of the LA County CMP) would yield an increase of 270 daily transit trips from approximately 400 transit trips to 670 transit trips, if the Wilshire Boulevard Bus Lane project were to be implemented. The end-to-end bus lane project would have significant benefit for these transit users. Early studies indicate end-to-end bus travel times could decrease by an average of 24 percent with bus speeds increasing by 32 percent. The higher bus speeds and higher quality transit that this transit improvement could provide has the potential to further increase the mode split of the residents and employees of the proposed project.

The removal of one of the three mixed-flow lanes during peak hours on this segment of Wilshire Boulevard would significantly impact the carrying capacity for mixed flow traffic, increasing traffic

congestion and related air emissions. With the increased delays on Wilshire Boulevard (estimated by LADOT to be 27 percent and 13 percent increased intersection delays at La Brea and Wilshire Boulevard during the morning and afternoon peak hours, respectively), a portion of the project's non-transit trips would likely shift to other east-west routes such as Olympic Boulevard. Metro is preparing a full EIR to evaluate potential impacts that may result from implementation from the Wilshire Boulevard Bus Lane project. **Any further analysis of this proposed project would be speculative and outside the scope of this EIR.**

Response No. 3-3

The Crenshaw–Prairie Transit Corridor Draft EIS/EIR project area extends approximately 10 miles from Wilshire Boulevard on the north to El Segundo Boulevard on the south. The study area includes portions of five local government jurisdictions as well as portions of unincorporated Los Angeles County. The study area is generally defined as north to Wilshire Boulevard, east to Arlington Avenue, south to El Segundo Boulevard and west to Sepulveda Boulevard/La Tijera Boulevard/LA Brea Avenue. The intersection of Wilshire Boulevard and La Brea Avenue is located at the northwest boundary of the study area. The purpose of the future study is to determine a preferred transit mode and general alignment for transit improvements.

Metro is preparing an Alternative Analysis (AA) and an Environmental Impact Report/Environmental Impact Statement (EIR/EIS), in compliance with CEQA and the National Environmental Policy Act (NEPA) for the Crenshaw–Prairie Transit Corridor project. A Light Rail Transit (LRT) alternative is being considered to allow for a future extension north of the Exposition Line, currently under construction, in the direction of Wilshire Boulevard and a potential connection to a fixed-guideway transit facility. Outside of the formal environmental study, the Crenshaw–Prairie Transit Corridor project team is also studying the feasibility of a future LRT extension north of Exposition/Crenshaw station in the direction of the intersection of Wilshire Boulevard and La Brea Avenue. The Notice of Intent for the AA/EIS and Notice of Preparation for the EIR were published in September and October 2007. Scoping meetings were held in October 2007. The environmental analysis and preparation of the AA/EIS/EIR began in spring 2008 and extends through the beginning of 2009. The AA/EIS/EIR is scheduled for circulation to the public and agencies for review and comment in the spring of 2009. Because final routes and specific proposals for transit improvements adjacent to the project site are speculative, any analysis or discussion of this wide ranging transit study is beyond the scope of the Draft EIR for this project. Furthermore, this project would enhance ridership opportunities by locating new housing and retail uses adjacent to a high transit corridor. Also, the development of this project would in no way prohibit the construction of any future transit improvements in the project area. The applicant will work with Metro to help facilitate future transit improvements.

Response No. 3-4

The AA for the proposed Westside Extension Transit Corridor Study is still underway and preparation of a full EIS/EIR is anticipated to begin in early 2009. Therefore, any future plans for a subway portal on the project site are speculative, and redesigning the project to accommodate a future portal for a possible subway station is not feasible at this time. The Applicant, however, has initiated discussions concerning plans for future Metro improvements in this area of Wilshire Boulevard. The Applicant is also evaluating with Metro the potential for a future portal on the southeast corner of Wilshire Boulevard and La Brea Avenue on the project site to the extent that a portal is feasible and would not unduly burden the project. Also, preliminary designs presented by Metro indicate that the main portal to the proposed station would be located on the northwest corner of Wilshire Boulevard and La Brea Avenue, where a current Metro building is located, and the project would not interfere with this proposed portal. Development of the project will not otherwise interfere with the construction of any future transit improvements in the area, and the Applicant will continue to work with Metro to help facilitate future transit improvements.


FORM GEN. 160 (Rev. 6-60)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

File: SC.CE.

DATE: September 23, 2008

TO: Jimmy Liao
City Planner/EIR Unit Head
Department of City Planning

FROM: 
Brent Lorscheider, Acting Division Manager
Wastewater Engineering Services Division
Bureau of Sanitation

RECEIVED
CITY OF LOS ANGELES

SEP 29 2008

ENVIRONMENTAL
UNIT

SUBJECT: Wilshire and La Brea Project – Draft EIR

This is in response to your August 28, 2008 letter requesting wastewater service information for the proposed project. The Bureau of Sanitation, Wastewater Engineering Services Division (WESD), has conducted a preliminary evaluation of the potential impacts to the wastewater system for the proposed project.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
Existing			
Church	200 GPD/1000 SQ.FT	35,000 SQ.FT	(7,000)
Commercial	80 GPD/1000 SQ.FT	30,000 SQ.FT	(2,400)
Proposed			
Apartment-Studios	80 GPD/DU	138 DU	11,040
Apartment-1 bdrm	120 GPD/DU	315 DU	37,800
Apartment-2 bdrm	160 GPD/DU	99 DU	15,840
Townhouse-2 bdrm	180 GPD/DU	10 DU	1,800
Retail	80 GPD/1000 SQ.FT	37,000 SQ.FT	2,960
Restaurant	300 GPD/1000 SQ.FT	8,000 SQ.FT	2,400
Parking	20 GPD/1000 SQ.FT	1,083 SQ.FT	21.66
Total			62,462

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SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes the existing 8-inch pipe in Sycamore Ave and La Brea Ave. The sewage from the existing lines flows into a 12-inch line on Sycamore Ave. The sewage then feeds into a 15-inch line on La Brea Ave before discharging into a 30-inch line. The current flow levels (d/D) in the 15-inch and 30-inch line can not be determined at this time as gauging is needed for these lines. Based on

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our available gauging information, the current flow level (d/D) in the 8-inch line on La Brea Ave, the 8-inch line on Sycamore Ave, the 12-inch line, and 30-inch line is approximately 18%, 22%, 40%, and 40% full, respectively. The design capacities at d/D of 50% for the 8-inch line on La Brea Ave is 458,645 gallons per day (gpd), for the 8-inch line on Sycamore Ave is 397,199 gpd, for the 12-inch line is 1.51 million gpd, and for the 30-inch line is 4.92 million gpd.

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Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a sewer connection point. If the local sewer line, the 8-inch to the 30-inch line, have insufficient capacity then the developer will be required to build a secondary line to the nearest larger sewer line with sufficient capacity. A final approval for sewer capacity and connection permit will be determined at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficiently capacity for the project.

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If you have any questions, please call Abdul Danishwar of my staff at (323) 342-6220.

c: Daniel Hackney, BoS

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Comment Letter No. 4

September 23, 2008

Brent Lorscheider, Acting Division Manager
City of Los Angeles
Bureau of Sanitation
Wastewater Engineering Services Division

Response No. 4-1

The comment discusses the sewer infrastructure in the vicinity of the project site and provides estimates for the existing wastewater flow, the expected wastewater flow of the proposed project, and indicates what the capacity and current flow levels are for the local sewer infrastructure.

An analysis of potential impacts related to the wastewater system are provided in the Draft EIR in Section IV.L.2, Wastewater. An estimate of how much wastewater the existing uses and proposed uses would generate is provided in Table IV.L.2-1 on page IV.L.2-4 of the Draft EIR. The Draft EIR indicated that there would be a net increase of 68,150 gallons per day of wastewater generated, while the Bureau of Sanitation estimates that there would be a net increase of 62,462 gallons per day of wastewater flow. Because the Draft EIR estimated a higher amount of wastewater flow when compared to the Bureau's estimate, the Draft EIR can be considered to have provided a more conservative analysis.

The letter provides additional detail regarding the infrastructure surrounding the site and indicates that it appears the system has the capacity to handle the sewerage flows generated by the project.

Response No. 4-2

The letter indicates that it appears the system has the capacity to handle the sewerage flows generated by the project, and that further detailed gauging and evaluation will be needed as part of the permit process to identify a sewer connection point. Further, if local sewer lines have insufficient capacity, the developer will be required to build a secondary line to the nearest larger sewer line with sufficient capacity. The Bureau of Sanitation was consulted during preparation of the Draft EIR, and similar information is provided in the Draft EIR on page IV.L.2-5. As required in MM-WW-1 provided on page IV.L.2-6 of the Draft EIR, if local sewer lines have insufficient capacity, the developer will be required to build a secondary sewer line to the nearest larger sewer line with sufficient capacity.

From: James O'Sullivan [jamesos@aol.com]
Sent: Tuesday, October 14, 2008 12:01 AM
To: ZiIF@leapinliz.com; Srimai.Hewawitharana@lacity.org; jimmy.liao@lacity.org
Subject: Re: Comments on Wilshire/La Brea Draft EIR - Case #ENV-2007-1604-EIR

Jimmy Liao

The Miracle Mile Residential Association supports the Sycamore Square community as expressed by Elizabeth Fuller in her email to you (see below) on 10/13/08.

We would also add the following comments on Growth and Infrastructure as well as water.

☐

1.1. The City Lacks Adequate Information to Assess the State of the

The City is charged with producing a report called the "Annual Report on Growth and Infrastructure." The report is supposed to "annually document what has actually happened to the City's population levels, housing construction, employment levels, and the availability of public infrastructure and public services..." The report is described in the Growth Monitoring section of the General Plan originally adopted on December 11, 1996 and Re-adopted on August 8, 2001 (CPC 94-0354 GPF CF 95-2259 CF 01-1162).

The report is supposed to: "...annually document what has actually happened to the City's population levels, housing construction, employment levels, and the availability of public infrastructure and public services. Information on environmental conditions will also be monitored on a yearly basis to maintain and update an environmental database, which will be used to facilitate ... environmental review for subsequent programs and projects in accordance with CEQA."

The City has seen its infrastructure become increasingly challenged as development continues without matching investment in the infrastructure. Every portion of the infrastructure including transportation, water, power, police, fire, parks, libraries and schools seems to be in a far more precarious state.

How can the City approve more development without understanding whether the City can withstand the demands of development on the infrastructure? Prior to approval of any project, the City must prepare the required reports from 1999 to the present so that the current state of the infrastructure can be assessed. The collection of yearly reports will also allow for the City and the public to understand the trajectory of infrastructure consumption and availability.

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1.2. If Every Project Has Been Mitigated to Insignificance, Why is the Infrastructure

Failing? With each successive project in the Miracle Mile area, the public is told that all impacts are reduced to insignificance or that the new project will result in a decreased impact. Thousands of new square feet of residential space and retail space have been created using this concept. If correct, the reasonable conclusion would be that traffic would be staying the same, police and fire stations would have fewer calls and schools would not become impacted.

Of course, this is not the case. With each successive development, traffic has become more congested. Police and firefighters have to cover more with less and schools see more students and fewer resources.

We submit that claims of insignificance and the methods for determining significance be modified to accurately reflect the true impact of development projects.

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10/15/2008

1.3. Water Supply

The availability of water to support increased population is becoming a central issue, so much so that Councilmember DENNIS ZINE recently suggested HALTING RESIDENTIAL DEVELOPMENT." The reality is that resources are not unlimited. We are perilously close to the line where we have no buffer between supply and demand.

The EIR done for this project does not mention the current restrictions on water in Los Angeles let alone this most recent developments. It states that the LADWP gets the majority of its water from the Metropolitan Water District but quotes figures from the Metropolitan Water District of Southern California, *Water Surplus and Drought Management Plan* (June 21, 2007) which includes the following information.

WSDM Plan at 23. Notably, the threat of water shortages was much greater in the late 1980s and early 1990s when the agency only had about 225,000 AF of water stored. Since then, MWD has increased its storage capacity significantly and today has more than 2.5 million AF of water stored around Southern California, including Diamond Valley Lake in Riverside County.

Unfortunately that is no longer the case. An October 10, 2008 Los Angeles Times story revealed further evidence that water resources are not unlimited stating that Diamond Valley Lake, the 4,500-acre lake near Hemet intended as a DRINKING WATER insurance policy for Los Angeles in case of a natural disaster – is at only 60% capacity, and the MWD board could start rationing Southern California cities as soon as 2009.

The true "current" state of the Water issues facing Los Angeles should be included in this EIR.

3

James O'Sullivan
President, Miracle Mile Residential Association
213.840.0246 - Cell

-----Original Message-----

From: Elizabeth Fuller <ZiIF@leapinliz.com>
To: Srimal.Hewawitharana@lacity.org; jimmy.liao@lacity.org
Sent: Mon, 13 Oct 2008 4:05 pm
Subject: Comments on Wilshire/La Brea Draft EIR - Case #ENV-2007-1604-EIR

To Whom it May Concern:

I have a number of a number of comments to offer on specific sections of the Draft EIR. But I must preface those comments with a couple of overall concerns:

First, I am becoming increasingly dismayed with a planning process in the City of Los Angeles that assumes zoning changes and variances to be standard procedure for every almost every commercial development project. Instead of developers working to pre-established codes for any given area, it has become standard procedure for each individual project to open up a revision process, at the developer's request, which effectively renders the existing code worthless and makes a mockery of its intent. This disregard for zoning also has enormous cumulative impacts on our overall urban environment, far beyond anything within the scope of any single EIR.

Second, any Environmental Impact Report for a project of this size (which so completely transforms and, for lack of a better term, "densifies" its space) that concludes every single section with a finding of "no impact," "no cumulative impacts," or "no impact after mitigation," as this one does, is both unrealistic and hard to take seriously.

Now, for a few specifics:

City Actions Requested -- The original list of specific zoning changes and variances requested was more than a page long. The sheer number of requests is striking (see my first overall comment, above). I am particularly concerned about changing the current [Q]C2-1 lots along Sycamore to [1][Q]C4-2. These lots originally contained duplexes similar to the ones that still exist along the east side of Sycamore between Wilshire and 8th St. When those homes were taken and converted to parking for the adjacent businesses fronting on La Brea, the zoning was still specifically held (through the [Q] condition) to R-2 density levels, or surface level parking, to preserve the overall density and character of the neighborhood. The overall neighborhood has not changed since then, but converting the Sycamore lots would result in a huge character change for the surrounding residential area.

Parking -- The proposed project would include 1,083 parking spaces for 562 residential units (1,220 residents) and 45,000 square feet of retail space. According to the Draft EIR, this number does meet city codes...but it still seems inadequate in the real world. 1,220 residents, plus commercial customers, plus 20 residential visitors could easily overwhelm the planned parking, forcing the overflow to neighborhood streets, which are already struggling with limited parking and sparse enforcement of posted parking restrictions.

10/15/2008

Traffic -- The Wilshire/La Brea intersection is already slow and tight, especially during peak traffic periods. The developers plan to widen La Brea, Sycamore and 8th, and to improve the signal system at Wilshire and La Brea. But these measures seem inadequate to the real-world picture of more than 1,000 people traveling in and out of the complex every day. Also, one particularly neglected element in this scenario is Sycamore Ave. Currently, Sycamore is a residential street, lined with duplexes, fourplexes and a few small apartment buildings. There is also an elementary school just two blocks south, at the corner of Sycamore and Olympic. The new development will put one of its two major entrance/exit points for vehicles on Sycamore Avenue. To assume that all the traffic to and from this access point will come from Wilshire Boulevard is definitely not realistic. Those of us who live here know that many people - including current residents - use Sycamore to access the neighborhood from both north and south and avoid the heavy traffic on La Brea. Going south to Olympic Blvd. (a major east/west artery) or making turns to go north: from Olympic Blvd., is actually much easier at the uncontrolled Sycamore intersection than it is at La Brea. Residents of the new development will quickly discover this, too, and Sycamore will be burdened with a lot more traffic than it currently carries. No provisions for this are made in the current plans, and this is not addressed in the EIR. One potential mitigation would be a cul de sac on Sycamore, just south of Wilshire, which would allow traffic from Wilshire to access the development but not travel any further south on Sycamore. But this is not discussed in the current plans, some sort of control measures (speed bumps, etc.) need to be added to the dialogue. In addition, traffic and pedestrian safety already is a big concern at Wilshire Crest Elementary School...and would become an even bigger issue with the added traffic the development would bring to Sycamore Ave. Currently, the school has no crossing guards at any of its corners, which are already difficult for children and other pedestrians to navigate, especially during peak periods when both commuter and school traffic are at their heaviest. Closer study of neighborhood traffic patterns are definitely needed, as is greater consideration for school safety.

Visual Resources -- The Draft EIR concludes that because there are no "significant" visual resources on the current site (now home to a large parking lot, the old Columbia Savings building and the MetroPlaza mini-mall), there would be no adverse visual impacts from the removal of the existing structures and construction of the new one. What the report fails to consider, however, is that the project would transform a very low-density block into a six-story tall, very massive structure. This creates a significant loss of a sense of space and openness, which has huge visual impact. Whether the current structures are worth saving is a separate issue (see below), but claiming that replacing low density, fairly open space with massive structures has no visual impact to the surrounding area simply isn't true.

Cultural Resources -- The Draft EIR contains lengthy architectural surveys of the buildings that currently occupy the block. The Columbia Savings section is particularly interesting. It describes many distinctive details of the building, including its unique atrium and stained glass skylight. But after clearly pointing out several architecturally significant features, the report then contradicts itself and concludes the building has "no distinct aesthetically valuable features." Another consideration is the development's proximity to the Miracle Mile Historic District, which extends west from La Brea Ave. The Draft EIR concludes that: "No direct impacts to the nearby Miracle Mile Historic District would occur due to its distance from the project site." In fact, city planners decided this question several years ago, when they ruled that structures on this block are close enough to affect the Miracle Mile District, and thus included it in the Miracle Mile CDO. It seems odd to claim that this site has no connection to or responsibility toward the Miracle Mile District when it is, in fact, included in the Design Overlay zone created to protect that very district. Finally, there is the issue of the development's proximity to and potential compatibility with the surrounding Sycamore Square neighborhood, which is made up of mostly 1920s single-family homes, duplexes and small apartment buildings. This neighborhood is eligible for HPOZ consideration, but the Draft EIR concludes that the new - very modern - development "would not alter the immediate surroundings of adjacent historical resources such that significant impacts would occur." The justification for this conclusion is that "a 15-foot-wide landscaped area" would "separate all historical resources from the new building." Again, this is simply not a real-world conclusion. One line (even a double line) of sidewalk trees does almost nothing to hide or even visually separate a low-density historical neighborhood from a six-story, full-block, very modern commercial complex.

Population and Housing -- Our Sycamore Square neighborhood (Wilshire to Olympic, La Brea to Citrus) has approximately 1,200 residents. This development would double that population within one square block of the neighborhood. According to the EIR, this number of residents, and residential units, can easily be absorbed by the overall Wilshire Community Plan area, and thus "would not have a significant impact on population growth." If we were talking about adding 1,200 residents to the overall Wilshire Plan area, and there were no other developments happening in the region, that would certainly be true. We, however, talking about adding 1,200 residents to a single block in a single low-density neighborhood and immediately doubling its population. To say this will have no significant impact is, again, simply unrealistic. Also, the Draft EIR notes that there are 37 other developments underway in the surrounding area. Specific information about the overall planned increase in population is not given, but it seems impossible to conclude that 37 developments will not have any cumulative impacts, and that this development will not be part of that cumulative picture.

Parks and Recreation -- According to the Draft EIR, the proposed development will contain "indoor club and fitness rooms, an outdoor pool and spa and open space for decks." But it also admits "the public open space and private recreation facilities included in the project design would not... meet the needs of the residents of the project for neighborhood or community parks." It also notes that our already few and far between parks (the nearest small playground is about eight blocks away) will be taxed by this influx of population. The mitigation measures proposed are payment of fees (presumably "Quimby Funds") to the city for park development or to developing "public park or recreation land on the project site." However, since they already stated that park space is not part of the development plan, this seems to be a contradiction, not a realistic expectation. A large complex containing a significant number of two-bedroom units will definitely be home to children who need playgrounds...and to a great many active young adults who need outdoor recreation space. The current plans do nothing to provide that space, and the project will definitely bring more traffic to our existing parks, which simply aren't adequate for the current population, much less another 1,200 people.

Transportation -- Given the proposed parking plans (1,083 spaces for 1,220 residents plus visitors and business customers), one would have to assume that both the City and the developers are hoping many residents will take advantage of living at the intersection of two busy thoroughfares and take public transportation instead of driving. Unfortunately, this, too, is fairly unrealistic given current public transportation service. Metro Rapid buses along Wilshire are already standing room only for most of the day, and a Purple Line subway is probably at least 20 years in the future. Current rapid transit is not up to absorbing a great number of new riders at this location, and if people do make the attempt, and find service crowded to the point of unavailability, they'll quickly look elsewhere - probably back to their cars - for most daily excursions.

Alternatives Considered But Rejected -- The developers state in the Draft EIR that several alternative projects were considered, including a no-build option, a commercial-only development that would not require any zoning changes (but would put a tall office tower along Wilshire Blvd.), a lower-density mixed-use development that would still be large enough to require the same list of zoning changes, and a project identical to the one proposed, but with no subterranean parking. It seems odd, however, that the option that seems most logical was not considered: a much lower-density mixed use or commercial development along Wilshire and/or La Brea (which might even preserve at least one or two of the existing structures), with R2-density housing along Sycamore. This would require far fewer zoning changes, and would provide an end result much more in keeping with the overall density, history and character of the surrounding neighborhood.

Finally, I will conclude by saying I am definitely not categorically opposed to development on this block. I do, however, have serious concerns about all of the above issues, which directly affect the quality of life in a neighborhood I have called home for 17 years. The developers will need to more carefully consider all of these issues - and not just the size of building the block will hold - if they hope to gain widespread support for the project and become the good neighbor they have repeatedly told us they would like to be.

Sincerely,

Elizabeth Fuller
903 S. Sycamore=20 Ave.
Los Angeles, CA 90036
(323) 939-6193
zlf@leapniz.com

10/15/2008

Comment Letter No. 5

October 14, 2008

James O'Sullivan, President
Miracle Mile Residential Association

Response No. 5-1

The commenter maintains that because the City has failed to produce the Annual Report on Growth and Infrastructure (Annual Report) since 1999, insufficient documentation exists to accurately assess the state of the City's infrastructure. He asserts that the Annual Report is required by the City's General Plan, and he suggests that the City must prepare the required Annual Reports for the missing years until present in order for the EIR to accurately analyze the capacity of the City's infrastructure to accommodate the project. The commenter, however, merely offers his opinion regarding the state of the City's infrastructure and the usefulness of the Annual Reports to provide additional information. Whether or not the Annual Reports will actually provide additional information is speculative. Furthermore, producing the Annual Report is not a mandatory requirement under the General Plan's Framework Element (Chapter 2, Growth Monitoring) for conducting CEQA review. It is a means to "facilitate" infrastructure assessment that may be useful for environmental review. The fact that further studies or analysis might be useful or shed light on the subject is not evidence that an EIR analysis is inadequate. One can always imagine some additional study or analysis that might provide helpful information, but it is the adequacy of the information found in the Draft EIR that is important.

The commenter does not provide any substantial evidence that the discussion of potential impacts to infrastructure in the Draft EIR is inadequate or that the evidence upon which the Draft EIR reaches its conclusions is flawed. The Draft EIR addresses the specific impacts of the project on City infrastructure and analyzes in detail the project's potential impacts on transportation, water, power, police, fire, parks, libraries, and school infrastructure based on the most current information. The commenter does not address whether this project-specific analysis is inadequate and does not offer any substantial evidence of a potentially significant impact to City infrastructure. The conclusions of the Draft EIR regarding the adequacy of infrastructure to accommodate the project are drawn from a variety of sources, including a traffic study approved by the Los Angeles Department of Transportation (LADOT); a Water Supply Assessment prepared by the Los Angeles Department of Water and Power (LADWP) and approved by the LADWP Board; and data and correspondences from the LADWP, the Bureau of Sanitation, Los Angeles Police Department (LAPD), Los Angeles Fire Department (LAFD), Los Angeles Unified School District (LAUSD) staff, Los Angeles Department of Parks and Recreation, and the Los Angeles Public Library (LAPL). Written correspondence is provided in the Appendices to the Draft EIR. These sources are sufficient to ascertain the availability of public infrastructure to accommodate the project and to

analyze any potential project impacts on the City's infrastructure that may result. Nonetheless, the comment will be forwarded to the decision maker for his or her consideration.

Response No. 5-2

Please see **Response No. 5-1**, above. In addition, a perceived increase in demand for municipal services and traffic congestion may not be evidence of a significant impact. The project and its cumulative contribution of impacts related to other projects in the area may result in an increase in demand for municipal services and traffic congestion, but significance is determined by the application of significance thresholds adopted by the City as lead agency. The Draft EIR sets forth significance thresholds, based on the City CEQA Thresholds Guide and local and state law, for each of the potential impacts referenced in the comment, and includes analysis regarding whether the project will result in individual or cumulative impacts based on these thresholds. The commenter has not explained how he believes that significance thresholds and methodologies should be modified and has offered no evidence that any perceived increase in demand for municipal services and traffic congestion results in a significant impact compared to these established thresholds.

Response No. 5-3

The commenter states his concern that there will not be enough water available to supply the project. However, as discussed on page IV.L.1-39 of the Draft EIR, a Water Supply Assessment (WSA) was prepared by the Los Angeles Department of Water and Power (LADWP) for the proposed project, which estimated the originally proposed project (which included more dwelling units than currently proposed.) to have a water demand of 94 acre-feet of water per year (afy). The WSA also states that LADWP would have adequate water to meet the proposed project's demands. After revisions to the original design and a reduction in the number of units, the proposed project would use approximately 75 afy, which is approximately 0.01 percent of the projected water demand of 683,000 afy in 2010 that LADWP plans to meet under average conditions. Therefore, the water demand generated by the proposed project is accounted for in LADWP's projections and the Water Supply Assessment prepared by LADWP confirms that there is adequate water supply to meet the proposed project's demand. As such, implementation of the proposed project and the resulting increase in water demand in the project area would not have the potential to result in significant impacts associated with water supply.

The commenter also questions the availability of water supply to meet demand for the City as a whole. However, the Draft EIR includes detailed information regarding past and current DWP and MWD plans and programs to secure future water supply for the City. These include numerous water purchase and transfer programs and the expansion of water entitlements through additional storage, recycling and conservation programs. This information reaffirms the WSA's conclusions that future water supply is

anticipated to meet demand created by the project. Additionally, as stated in the 2005 UWMP and in the MWD and DWP plans and programs referenced in the Draft EIR, DWP anticipates meeting all existing and planned future water demands in its service area for the foreseeable future.

Finally, the commenter cites an October 10, 2008, Los Angeles Times article to support his argument that water supply is not unlimited and that because the Diamond Valley lake reservoir is at 60 percent capacity, the MWD board could start rationing water to Southern California cities. The commenter is correct to imply that water supply may not be unlimited and that shortages in supply may occur. However, the Draft EIR is not required to demonstrate an unlimited supply. It is required to describe the current state of water supply and to make a conclusion as to the likelihood of future supply availability based on substantial evidence. The California Court of Appeal in *Santa Clarita Organization for Planning the Environment v. County of Los Angeles* (2007) 157 Cal.App.4th 149 (the "SCOPE" case) upheld the sufficiency of a water supply analysis in an EIR for a long-term, large scale mixed-use development. In upholding this analysis, the court emphasized that future water supplies need not be absolutely concrete, but any uncertainty must be discussed in the EIR. Further, evidence must support any conclusion regarding those future supplies for the EIR to be legally sufficient. The Draft EIR includes a detailed discussion of potential water supply uncertainties and, as stated above, includes substantial evidence that future water supplies will be available for the project based on the DWP and MWD plans and programs described in the Draft EIR.



5858 WILSHIRE BOULEVARD, SUITE 205
LOS ANGELES, CA 90036-4521
323-964-7100 X223

October 10, 2008

Mr. Jimmy Liao
City Planner/EIR Unit Head Environmental Review Section
Los Angeles Department of City Planning – City Hall
200 North Spring Street, Room 750
Los Angeles, CA 90012

Re: ENV-2007-1604-EIR

Dear Mr. Liao,

The Miracle Mile Players, a not-for-profit (501 (c) (3)) organization located in the Miracle Mile District area, strongly supports the proposed mixed-use project at the corner of La Brea Avenue and Wilshire Boulevard. The Miracle Mile Players has long been dedicated to providing a forum for emerging artists, musicians and filmmakers in this cultural center of Los Angeles. In addition, in this past year, our organization has sponsored two "Runs" in our area. The proceeds of these events have been distributed to local area schools, the Wilshire Explorers group and LACMA's NexGen program.

The proposed redevelopment is long overdue. This corner of the city and gateway to the Miracle Mile has become an eyesore through years of disinterest and calls for a major statement. The addition of new retail uses and apartments will provide an opportunity to revitalize the area and help alleviate the city's housing shortage. We also appreciate the commitment to invest in the area given the current economic situation.

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The proposed uses located along a major transit corridor are a good example of smart growth. Upon completion, the project will create a more walkable community and place residents in close proximity to local shops and restaurants, and public transit services, reducing people's dependence on cars.

The environmental impact report has reviewed the major concerns of the community, and we encourage the city to move forward with the project.

Sincerely,

James Panozzo,
Executive Director

Comment Letter No. 6

October 10, 2008

James Panozzo, Executive Director
Miracle Mile Players
5858 Wilshire Boulevard, Suite 205
Los Angeles, California 90036-4521

Response No. 6-1

The commenter expresses support for the proposed project. The comment will be provided to the decision makers for their review and consideration prior to any approval action on the project. As this comment is not directed at the environmental analysis or conclusions in the Draft EIR, no further response is required.



Art Deco Society of Los Angeles
P.O. Box 972
Hollywood, CA 90078

Srimal Hewawitharanan Project Coordinator
Jimmy C. Liao, City Planner / EIR Unit Head
Room 750, City Hall Department of Planning
200 North Spring Street
Los Angeles, CA 90012

Dear Mr. Hewawitharana and Mr. Liao:

Oct. 13, 2008

The Murphy's Oldsmobile Dealership Building at 758 South La Brea Ave. has long been on the Art Deco Society of Los Angeles's radar as a building worthy of preservation. As a contributing structure in the Miracle Mile District, this Streamline Moderne building tells an important story of the emerging car culture of our city. Not only does it emphasize speed with its clean horizontal lines, it also beckons to drivers on busy Wilshire Boulevard with its bold tower jutting into the sky and topped with ball.

The destruction of the Murphy Oldsmobile Dealership building would diminish the impact of the Miracle Mile District as a whole. Considered by many to be the second largest concentrations of Art Deco structures in the United States after Miami, Florida, the Miracle Mile is fast becoming a destination spot for nightlife. But with each structure that gets destroyed, the value of the cohesion of the district and by extension the marketability of the area, is weakened.

The proposed Wilshire and La Brea Project (EIR case # ENV-2007-1604-EIR) as currently slated is not only woefully out of scale for the Sycamore Park Neighborhood of early twentieth century story book bungalows, but is an overly ambitious given traffic congestion and current World financial slowdowns.

On behalf of the Art Deco Society of Los Angeles, I respectfully ask that you reconsider the demolition of the Murphy Oldsmobile Dealership Building and help to save an important link to our cities past.

Most Sincerely,

Rory Cunningham,
President, Art Deco Society of Los Angeles

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Comment Letter No. 7

October 13, 2008

Rory Cunningham, President
Art Deco Society of Los Angeles
P.O. Box 972
Hollywood, California 90078

Response No. 7-1

The commenter incorrectly describes the 752 South La Brea Avenue property as 758 South La Brea Avenue, which includes the former Murphy Oldsmobile Company (Murphy dealership). The Murphy dealership is identified by a single address, 752 South La Brea Avenue, as noted in several locations, such as on page 16, of the Chattel Architecture, Planning & Preservation, Inc. report dated May 13, 2008 (Chattel report), which was contained in Appendix IV.C of the Draft EIR. Moreover, as described on page 31 of the Chattel report, the Miracle Mile Historic District, a nearby historical resource listed in the California Register, does not include the Murphy dealership, which is not located within the established boundaries of the District (i.e., between 5320–5519 Wilshire Boulevard, or west of La Brea Avenue and east of Burnside Avenue), or described in the 1983 Request for Determination of Eligibility for Inclusion in the National Register of Historic Places (DOE report) as one of the 19 contributing properties. Figure 60 of the Chattel report contains a reproduction of the map from the DOE report showing the boundary of the district; the Murphy dealership is not included within the boundary shown. In regard to the commenter noting the importance of the Miracle Mile area as one of the largest concentrations of Art Deco structures in the United States, comment noted. The Miracle Mile area is described on pages 6 through 8 of the Chattel report and page IV.C-20 of the Draft EIR. Regarding the Murphy dealership, as stated on page 21 of the Chattel report and summarized on page IV.C-31 of the Draft EIR:

While it retains elements of its Art Deco influence, including the curved and canted front façade wall and the vertical pylon, these characteristics do not appear to rise to the level of distinctiveness that would lead to the building's individual eligibility under [California Register] criterion 3. In addition, alterations, including new stucco, removal of windows, and rearrangement of storefronts, has dulled architectural lines and features and obscured the original Art Deco characteristics. As such, the building appears to be an undistinguished, altered example of a commercial building with Art Deco influences that does not embody distinctive characteristics of the type, period, region, or method of construction that would lead to its individual eligibility. The building does not exhibit high artistic value nor can the architect, Max Maltman, be considered an important creative individual. The building, therefore, does not appear individually eligible for listing in the California Register under criterion 3.

Response No. 7-2

The commenter states that the proposed project is out of scale with the adjacent so-called “Sycamore Park Neighborhood,” identified in the Chattel report as a Potential Period Revival Residential Historic District. The early 20th-century buildings that make up the neighborhood are a combination of single- and multi family residences that are one- or two-stories and in limited cases three-stories in a combination of Period Revival styles popular in Los Angeles in the 1920s and 1930s. These historic buildings are typically situated on individual residentially zoned parcels, and by contrast the proposed project covers a full City block zoned for commercial use. The proposed project is three stories in height along Sycamore Avenue, stepping up toward Wilshire Boulevard and La Brea Avenue. While this height is somewhat taller than the generally two-story multi-family buildings on the east side of Sycamore Avenue, as described on page 37 of the Chattel report and summarized on page IV.C-42 of the Draft EIR:

The massing of the building is further broken down at the street-level defined by the building’s three-story height. Here, small-scale recessed entries directly off the sidewalk are defined by low, stepped platforms and overhanging entry canopies. These design features keep the scale and mass of the new building relatively similar in its relationship to the street to that of the nearby residences. Meanwhile, the taller residential units of the remaining four floors set back on the base are much less articulated architecturally so that they visually recede. The residential character of the street is further reinforced through reiteration of landscape features characteristic of the area such as tree-lined sidewalks set off from the street with planting strips or parkways and front-yard setbacks. These landscape features serve to further define the individual entries to the three-story flat/townhouse units and contribute to the overall pedestrian scale of the neighborhood.

Designed as a single mixed-use building to accommodate multi-family housing and ground floor retail, the proposed project has a massing that differs substantially from that of the existing single- and multi family residential buildings in the neighborhood. The above-described three-story frontage on the west side of Sycamore Avenue successfully mitigates potential impacts on the historic properties across the street and in the larger neighborhood to the east and south. There is no doubt that the addition of the proposed project will change the setting of the identified historical resources. A change in setting is not in and of itself considered a “substantial adverse change” to an historic resource under CEQA. For the taller proposed project to cause a substantial adverse change to the setting of the identified historical resources it would have to diminish the “character of the place in which the property played its historical role” or how “the property is situated and its relationship to surrounding features.” (National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation, National Park Service, revised for the internet 2002, <http://www.cr.nps.gov/nr/publications/bulletins/nrb15/>.)

As provided in CEQA Section 21068, significant impact on the environment means “a substantial or potentially substantial, adverse change in the environment.” *State CEQA Guidelines* Section 15064.5(b)(1) provides, “Substantial adverse change in the significance of an historical resource means physical

demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” The potential to indirectly alter in an adverse manner the physical characteristics or qualities that make an historical resource significant was also evaluated in the Chattel report. As described on page 37 of the Chattel report and summarized on page IV.C-43 of the Draft EIR:

[T]he new proposed building will not materially alter the setting of adjacent or nearby historical resources in an adverse manner; rather, the new proposed building will beneficially contribute to the setting by filling in the streetscape with a defined edge similar to the existing. The overall height and setbacks of the proposed building also appears to be generally compatible with existing development in the immediate surroundings of the project site.

State CEQA Guidelines Section 15064.5(b)(3) finds that “a project that follows the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitation, Restoring, and Reconstruction Historic Buildings (Secretary’s Standards) ... shall be considered as mitigated to a level of less than a significant impact on the historical resource.” The Secretary’s Standards, particularly the rehabilitation standards, anticipate change. Variety in building height is already a characteristic of the neighborhood.

Additionally, Section IV.A, Visual Resources, of the Draft EIR sets forth seven factors to be considered in determining whether the project would have a significant impact with respect to visual character analyzes these factors with respect to the project and the cumulative development of the surrounding area. Section IV.G, Land Use, of the Draft EIR and Tables IV.G-1 through IV.G-5 specifically addresses the project’s impacts to visual character and its consistency with applicable local and regional land use plans. The Draft EIR concludes that no project-specific or cumulatively significant visual character or land use impacts will result. The commenter does not identify any defects in this analysis and offers no substantial evidence to contradict the conclusion of the Draft EIR.

Response No. 7-3

The commenter does not identify a defect in the Draft EIR traffic impact analysis or offer evidence of a traffic congestion impact not disclosed or analyzed in the Draft EIR.

Pursuant to the City of Los Angeles Department of Transportation (LADOT) policies and using industry standard methodologies, the traffic impact of the Project’s net change in traffic volume has been calculated by adding the Project volume to the “cumulative without project” traffic volume. Comparing the changes in the traffic conditions provides the information to determine if the project-generated traffic increases create a significant impact on the study intersection. According to the standards adopted by LADOT, a project traffic impact is considered significant if the related increase in the V/C value equals or

exceeds the significance thresholds shown in **Table III-2** and provided on pages IV.K-9 and IV.K-10 of the Draft EIR.

Table III-2
V/C Ratios as Significance Thresholds

LOS	Final V/C Value	Increase in V/C Value
C	0.701–0.800	+ 0.040
D	0.801–0.900	+ 0.020
E, F	> 0.900	+ 0.010 or more

Source: Overland Traffic Consultants, November 2008.

Using criteria established by the LADOT it has been determined that the change in traffic patterns associated with the proposed project may significantly impact the traffic flow at three intersections during the weekday peak hour traffic flow prior to the implementation of traffic mitigation measures. The three intersections that potentially may be significantly impacted without mitigation measures by the project during the weekday peak hours are: La Brea Avenue and Wilshire Boulevard; Wilshire Boulevard and Highland Avenue; and 8th Street and La Brea Avenue.

With the implementation of the proposed mitigation measures MM-TRA-1, MM-TRA-2, and MM-TRA-3 identified on page IV.K-37 of the Draft EIR and approved by LADOT, all significant operational project traffic impacts will be reduced to less than significant levels.

With regard to the “world financial slowdown,” the commenter does not specify or relate the world economic slowdown to an environmental impact. Economic impacts, to the extent that the comment implies an economic impact, are not considered environmental impacts under CEQA.

Response No. 7-4

Please see **Response No. 7-1**. This comment will be provided to the decision makers for their review and consideration prior to any approval action on the project. As this comment is not directed at the environmental analysis or conclusions in the Draft EIR, no further response is required.

KRAMER LAW GROUP

5858 WILSHIRE BOULEVARD, SUITE 205
LOS ANGELES, CALIFORNIA 90036-4521
TELEPHONE 323-964-7100
FACS: MILE 323-964-7107
WWW.KRAMERLAW.BIZ

October 13, 2008

Mr. Jimmy Liao
City Planner/EIR Unit Head Environmental Review Section
Los Angeles Department of City Planning – City Hall
200 North Spring Street, Room 750
Los Angeles, CA 90012

Re: ENV-2007-1604-EIR

Dear Mr. Liao,

The Kramer Law Group, which has been located in the Miracle Mile District for close to fifteen years, strongly supports the proposed mixed-use project at the corner of La Brea and Wilshire Boulevard.

The proposed redevelopment is long overdue. This corner of the city and gateway to the Miracle Mile has become an eyesore through years of disinterest and calls for a major statement. The addition of new retail uses and apartments will provide an opportunity to revitalize the area and help alleviate the city's housing shortage. We also appreciate the commitment to invest in the area given the current economic situation.

The proposed uses, located along two major transit corridors, are a good example of smart growth. Upon completion, the project will create a more walkable community and place residents in close proximity to local shops and restaurants, and public transit services, reducing people's dependence on cars.

The environmental impact report has reviewed the major concerns of the community, and our office encourages the city to approve and move forward with this project.

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Best regards,

KRAMER LAW GROUP

By: _____

Stephen W. Kramer

Comment Letter No. 8

October 13, 2008

Stephen W. Kramer
Kramer Law Group
5858 Wilshire Boulevard, Suite 205
Los Angeles, California 90036-4521

Response No. 8-1

The commenter expresses support for the proposed project. This comment will be provided to the decision makers for their review and consideration prior to any approval action on the project. As this comment is not directed at the environmental analysis or conclusions in the Draft EIR, no further response is required.



October 13, 2008

Mr. Jimmy Liao
City Planner/EIR Unit Head Environmental Review Section
Los Angeles Department of City Planning - City Hall
200 North Spring Street, Room 750
Los Angeles, CA 90012

Re: ENV-2007-1604-EIR

Dear Mr. Liao,

The Miracle Mile Chamber of Commerce, which represents a thriving cultural and business community in the historic Miracle Mile area, strongly supports the proposed mixed-use project at the corner of La Brea Avenue and Wilshire Boulevard.

The proposed redevelopment is long overdue. This corner of the city and gateway to the Miracle Mile has become an eyesore through years of disinterest and calls for a major statement. The addition of new retail uses and apartments will provide an opportunity to revitalize the area and help alleviate the city's housing shortage. We also appreciate the commitment to invest in the area given the current economic situation.

The proposed uses located along a major transit corridor are a good example of smart growth. Upon completion, the project will create a more walkable community and place residents in close proximity to local shops and restaurants, and public transit services, reducing people's dependence on cars.

The environmental impact report has reviewed the major concerns of the community, and we encourage the city to move forward with the project.

Sincerely,

William Bergstrom, Executive Director

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Comment Letter No. 9

October 13, 2008

William Bergstrom, Executive Director
Miracle Mile Chamber of Commerce

Response No. 9-1

The commenter expresses support for the proposed project. The comment will be provided to the decision makers for their review and consideration prior to any approval action on the project. As this comment is not directed at the environmental analysis or conclusions in the Draft EIR, no further response is required.



October 17, 2008

Submitted electronically

Mr. Jimmy C. Liao, City Planner/EIR Unit Head
Department of City Planning
Room 750, City Hall
200 North Spring Street
Los Angeles, CA 90012
Email: Jimmy.Liao@lacity.org

Re: Wilshire and La Brea Project – ENV-2007-1604-EIR – Draft EIR

Dear Mr. Liao

On behalf of the Los Angeles Conservancy, we submit these comments on the historical and architectural significance of the former Columbia Savings & Loan Building (also referred to as Wilshire Grace Church) at 5220 Wilshire Boulevard and the need for consideration of preservation alternatives as part of the ongoing environmental review process.

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with over 7,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural heritage of Los Angeles through advocacy and education. Since 1984, the Conservancy’s all-volunteer Modern Committee has worked to raise awareness about Los Angeles’ unique collection of mid-20th-century modernist structures that shaped the tastes and architectural trends of the entire nation.

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I. Substantial evidence supports a fair argument that the project will cause a substantial adverse change to a historical resource

Courts often refer to the EIR as “the heart” of CEQA because it provides decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzes a range of alternatives that reduce those impacts. Based on the objective analyses in the EIR, CEQA requires public agencies to deny approval of a project with significant adverse impacts when there are feasible alternatives or mitigation measures that can substantially lessen such effects. As applied to the proposed project, the EIR must evaluate preservation alternatives given substantial new evidence in the record establishing the significance of Columbia Savings.

A. Based on its historical and architectural significance, Columbia Savings qualifies as a “historical resource” under CEQA

Completed in 1965 and designed by architect Irving Shapiro, Columbia Savings is a monumental example of modernist bank architecture that derives from earlier bank building precedents, integrates art into the building, and served as an icon for the institution it was designed to serve. During the postwar era, banks throughout the nation revolutionized their designs by breaking away from the dominant classical revival styles from the previous century. Irving Shapiro responded, through a design competition, by recalling the monumental presence of earlier banks, but incorporating expansive glass windows across the ground floor to create transparency. The building’s exterior is clad in split-faced marble tile and featuring

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523 West Sixth Street, Suite 826, Los Angeles, California 90014 T: 213 623 2489 F: 213 623 3909

dramatic use of structural forms on the building's upper floors. The monumental signage Shapiro designed for the bank is the in form of two 85-foot tall sculptural pylons that reach beyond the building's height and are visible from great distances.

The quality of Columbia Savings' design is particularly expressed in the number of design solutions that were achieved at the site. The cantilevered sculptured trellises of metal lath and plaster that are suspended between the building's four corner support piers also function as shading for the second and third floor glass walls.¹ The free-standing screen-waterfall, a major component of the site's art program located alongside the building's west elevation, also served to shield the west-facing windows from the mid-day sun. The twin 85-foot tall sign towers are exceptional for a bank, and are visible from great distances, taking advantage of the southwesterly bend that La Brea Avenue follows south from Wilshire to maximize visibility. The entire building is constructed on a raised platform that recalls the earlier design and form of banks inspired by Classical temples, but additionally, this raised volume conceals a lower level that housed the building's power and electrical equipment.²

Columbia Savings' innovative concrete engineering was noted as far away as Europe, where the French architecture journal *L'architecture d'au jour d'hui* explained to readers that, "the entire building is suspended from four massive reinforced concrete piers, each weighing 375 tons."³ Additionally, Columbia Savings was judged by the Ceramic Tile Institute in 1965 and received an award for the quality and craftsmanship of the building's exterior cladding of split-faced marble tile.⁴

1. Columbia Savings in the Context of Postwar Bank Design

Banks as a building type underwent an incredible transformation following WWII, as financial institutions nationwide recognized the need for progressive banking methods and architects responded by radically reinventing the bank's form. The magnitude of this trend for American society, and for banking and architecture specifically, prompted the journal *Architectural Record* to publish a set of articles on the subject in 1945, noting that, "perhaps in no field of activity have changed methods of work caused such a striking change in building needs as in the old conservative field of banking."⁵

Throughout the 19th and early 20th centuries, Classical-inspired architecture was the norm for banks seeking to convey stability and the image of a financially sound institution. Inside these temples of commerce, however, bank design and layout did not specifically cater to the individual as a consumer. Postwar prosperity changed the banking industry forever, as "the middle class and its spending power were finally recognized."⁶ When wartime building restrictions were lifted in 1947, modernism was quickly embraced by banking institutions seeking to convey a bright new future as they overhauled their design to meet the changing needs of postwar society. Several design features became commonplace, including facades with large expanses of glass to allow passersby to admire spacious interior bank lobbies and open teller counters.⁷ *Architectural Forum* summarized the reasons behind the new look of American bank buildings:

¹ "Columbia Savings and Loan Association." *Metal Lath News*, Vol. 30. No. 1. Winter, 1966.

² "Columbia Savings." *Contemporary Living*, Special Summer Edition, 1965.

³ "Caisse d'epargne, Los Angeles." *L'architecture d'au jour d'hui*, June-July, 1966.

⁴ "CTI Announces 1965 Tile Award Winners." *Building News*. Vol. 20. No. 26. 14 Apr. 1966.

⁵ "Banks." *Architectural Record*, March, 1945.

⁶ Belfoure, Charles. *Monuments to Money: The Architecture of American Banks*. Jefferson, NC: McFarland, 2005: 245.

⁷ Belfoure, Charles. *Monuments to Money: The Architecture of American Banks*. Jefferson, NC: McFarland, 2005: 245.

Banks used to sell security. But now, with their deposits federally insured, they are selling service. Today's bankers are an aggressive new breed of financial merchandisers, replacing the stiff old banking types of yesteryear, and they are out to lure ever passing pedestrian into opening a special checking account.⁸

In *Moments to Money*, author Charles Belfoure notes, "by the late 1950s and early 1960s, bank design seemed to go in two distinct directions: rectangular glass boxes such as those of Mies van der Rohe, or more plastic forms executed in poured concrete and favored by the other modern master of the period, LeCorbusier."⁹ "In the early 1960s," Belfoure continues, "architects began to merge the two aesthetics of glass and concrete."¹⁰ It is within this category of American bank design that Columbia Savings fits. The design melds two divergent design approaches reflected in American bank design following WWII: transparent banks, which featured entire elevations of expansive glass, and sculptural banks, in which a building's volume was shaped by a diverse range of forms executed in concrete or other materials. Columbia Savings presents a massive and solid presence to the street, primarily from its uniform volume and use of masonry cladding. However, apart from the four massive reinforced concrete piers, all exterior walls are solar-bronze tinted glass, with sculptured trellises functioning as "shading for the second and third floor glass walls."¹¹ The effective design imparts the illusion of the cantilevered upper floors having a floating quality above the vast expanses of glass below, particularly when illuminated at night.¹² Another, less monumental example of a Los Angeles bank whose design combines both transparent and sculptural qualities is architect Richard Dorman's Beverly Hills National Bank (1965), located at 143 South Barrington Place.¹³ Belfoure himself has described Columbia Savings as "a modernist way of interpreting a classical bank's composition," noting that its combination of quality design, artwork and monumental signage make it "a really excellent example of this time period...a complete package."¹⁴

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2. Significant Integrated Art Components

Artwork was integral to Shapiro's design concept for Columbia Savings, including a 40-foot by 10-foot bronze water sculpture designed by local artist Taki and a monumental dalle de verre glass installation capping the interior light well of the building. The screen-waterfall, currently not in operation, consists of a cellular screen composed of brass panes.

Dalle de verre, also known as slab glass or faceted glass, is a modern form of stained glass developed in Europe in the 1930s. Inch-thick chunks of colored slab glass are set in a reinforced concrete matrix rather than ¼-inch thin glass held in place with lead armature as in traditional stained glass. A thoroughly modern material, dalle de verre is distinguished by bold, vibrant colors and robust designs and was used to great effect and prominence in Wallace K. Harrison's First Presbyterian Church in Stamford, Connecticut in 1958.

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Designed and hand-made by French artist and sculptor Roger Darricarrere, the 36-square-foot skylight capping Columbia Savings weighs 18,000 pounds and includes thousands of separate pieces of thick stained glass sculpted into concrete-and-steel reinforced panels, filtering light through orange, yellow,

⁸ Belfoure, 250.

⁹ "Sculptural Approach to a National Bank." *Architectural Record*, Vol. 137, No. 6, June, 1965: 197. Architect Craig Ellwood's South Bay Bank (1958), located at 1800 S. Sepulveda Blvd., Manhattan Beach, exemplifies this transparent school of postwar bank design, while architect Charles Deaton's Wyoming National Bank (1962), in Casper, Wyoming, exemplified the sculptural school.

¹⁰ Belfoure, 257.

¹¹ "Columbia Savings and Loan Association." *Metal Lath News*, Vol. 30, No. 1, Winter, 1966.

¹² "Columbia Savings and Loan Association." *Metal Lath News*, Vol. 30, No. 1, Winter, 1966.

¹³ "Four Buildings for Banking." *Architectural Record*, Vol. 142, No. 1, July, 1967: 130.

¹⁴ Belfoure, Charles. Interview with the author, 20 Sept. 2006.

deep amber, turquoise and violet-colored glass. A graduate of the Ecole des Beaux Arts in Paris, Darricarrere was widely recognized as a skilled dalle de verre glass artist, and is credited with helping to introduce the technique to America after World War II. Although little research or survey work has been done on dalle de verre in Los Angeles, the installation at Columbia Savings may be one of the largest and most spectacular in the city, if not the state.

3

II. Conclusion

A key policy under CEQA is the lead agency's duty to "take all action necessary to provide the people of this state with... historic environmental qualities...and preserve for future generations...examples of major periods of California history."¹⁵ With regard to Columbia Savings, substantial new information clearly establishes the building's architectural significance, such that it should be carefully re-evaluated for its eligibility for listing in the California Register of Historical Resources. Under the current range of alternatives for the project, only Alternative 1 (No Project, No Building Alternative) retains existing on-site structures. Therefore, the EIR should be augmented to include one or more alternatives that retain and reuse Columbia Savings while allowing new development throughout the rest of the block.

4

Thank you for the opportunity to comment on the draft EIR for the Wilshire and La Brea Project. Please feel free to contact me at (213) 430-4203 or mbuhler@laconservancy.org should you have any questions.

Sincerely,



Mike Buhler
Director of Advocacy

¹⁵ PRC §21001 (b), (c).

List of Attachments

1. **Columbia Savings featured in Metal Lath NEWS.** "Columbia Savings and Loan Association." *Metal Lath News*, Vol. 30. No. 1. Winter, 1966.
2. **Columbia Savings featured in Contemporary Living.** "Columbia Savings." *Contemporary Living*, Special Summer Edition, 1965: 2.
- 3-4. **Columbia Savings featured in L'architecture d'au jour d'hui.** "Caisse d'epargne, Los Angeles." *L'architecture d'au jour d'hui*, June-July, 1966: 100-101
5. **Columbia Savings receives Award for Tile Craftsmanship.** "CTI Announces 1965 Tile Award Winners." *Building News*. Vol. 20. No. 26. 14 Apr. 1966.
6. **Image of Craig Ellwood's South Bay Bank.** Belfoure, Charles. *Monuments to Money: The Architecture of American Banks*. Jefferson, NC: McFarland, 2005: 257.
7. **Image of Charles Deaton's Wyoming National Bank.** "Sculptural Approach to a National Bank." *Architectural Record*, Vol. 137. No. 6. June, 1965: 197.
8. **Image of Richard Dorman's Beverly Hills National Bank.** "Four Buildings for Banking." *Architectural Record*, Vol. 142. No. 1. July, 1967: 130.
9. **Columbia Saving's dalle de verre skylight featured in Los Angeles Times.** "Stained Glass Skylight Feature of New Office." *Los Angeles Times*. 30. Aug. 1964: L13

Vol. 30 No. 1
WINTER 1966

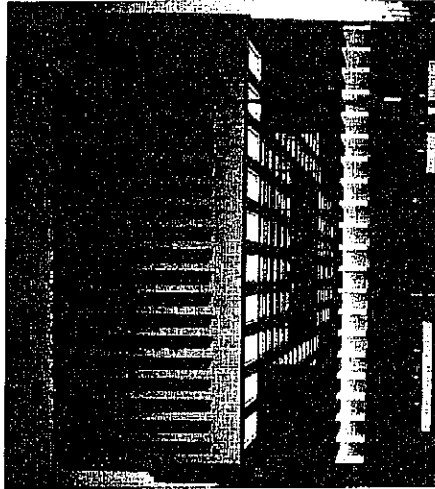
Metal Lath NEWS



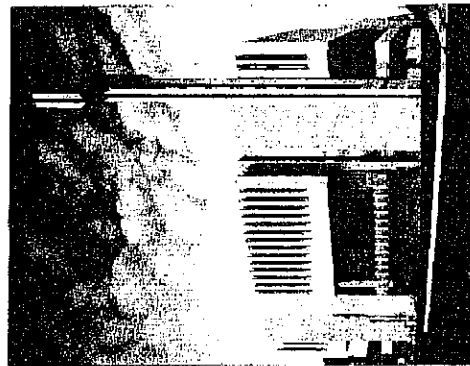
COLUMBIA SAVINGS AND LOAN ASSOCIATION Los Angeles, California

architect
lathing and
plastering contractor
general contractor

Irving D. Shapiro
Cornell Brennan Co.
Rena Corp.



Interior suspended ceiling and walls are plastered metal lath. Architect Shapiro noted that the use of metal lath reduced plaster cracking, made expansion and contraction separation control easier.



Cantilevered sculptured trellises of metal lath and plaster suspended between the support piers function as shading for the second and third floor glass walls. Promoting a new role for banks, the third floor, designed as a balcony, is called "La Gal-leria" presenting local art work. Cost: approx. \$1 million. Area: 38,000 sq. ft.

PHOTO: MALVIN RAND

Marking the site of Columbia Savings and Loan Association's new Home Office are two 85-foot-high sign towers, visible for miles at the southeast corner of the busy intersection of Wilshire Boulevard and La Brea Avenue. Here Columbia's savings center dominates the east gateway to the famed Miracle Mile.

The dramatically sculptured building appears much larger than its three stories and lower level. Elevated on a Grecian-inspired black slate raised platform, the 38,000-square-foot building is suspended from four massive reinforced concrete piers, each weighing 375 tons. Except for these wide anchor piers, the exterior is of glass, with white plaster cantilevered trellises, for styling and sun control, projecting outward as do the two upper levels.

Flanking the front and rear entrances are pairs of white marble reflector pools with fountain sprays. Along the building's western exterior paralleling La Brea is a unique free-standing screen-waterfall.

On entering Columbia's new home, your first impressions are of spaciousness, loftiness and elegance. Light and modulated colors surround you.

The lobby, or savings level, is carpeted and furnished in tones of gold, walnut and slate green with bold accents of black and white. This color scheme is maintained throughout the building.

Most of the light is natural, as the walls of the building are solar-bronze tinted glass extending from ground level to the first over-hang balcony 28 feet above. Textured drapes hang this full distance to soften the vertical lines. Coffered fluorescent lighting, designed as an integral part of the ceiling pattern, adds just the right amount of artificial illumination. A subtle diffusion of colored light filters down from an immense skylight 62 feet above through a 1,600-square-foot lightwell. From the lobby far below, this exciting multi-colored stained glass skylight caps the building like a giant jewel. This skylight and the screen-waterfall are outstanding examples of the blending of art and architecture which has contributed to this landmark structure.

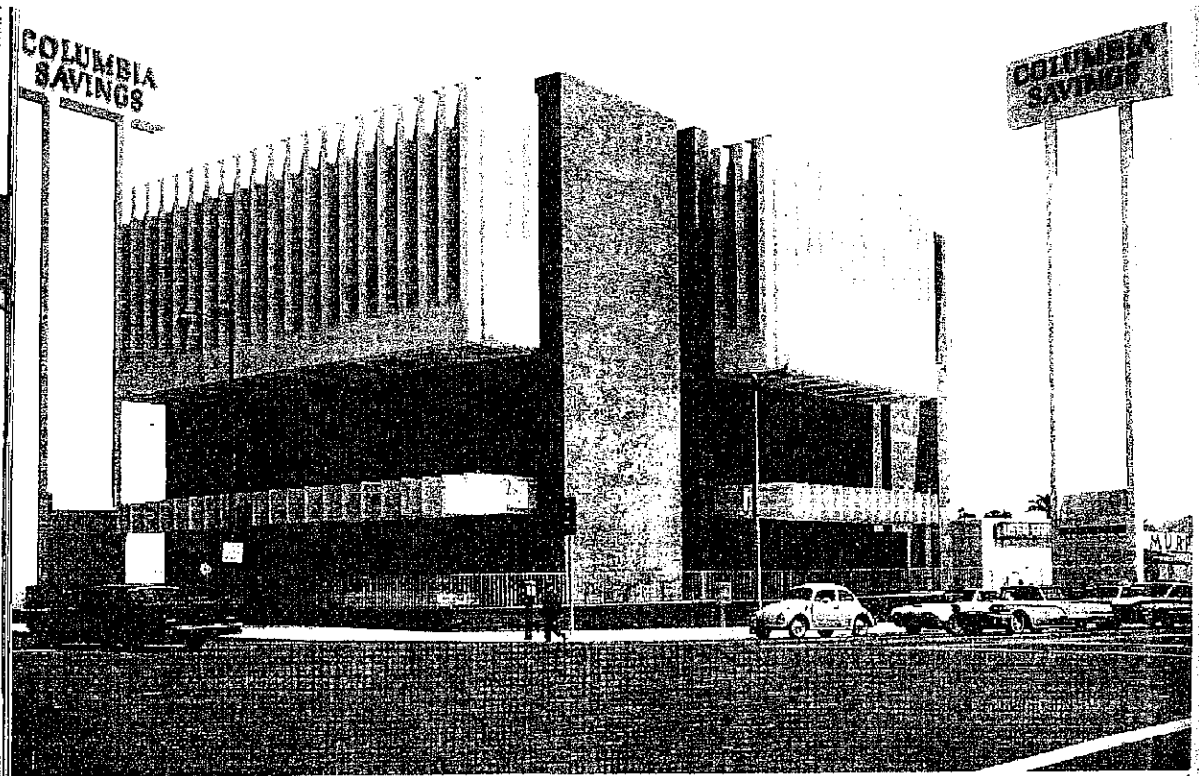
The four master piers supporting the building are finished in greenish-grey imported split-marble that results in a rough and sturdy surface. Roman travertine and walnut paneling are used above the elevators and side doors. Concealed within teak panels above the front and rear entrances are surveillance cameras which can constantly photograph all activity on the lobby level.

Looking east as you enter are the new accounts department, the teller area with the accounting department directly behind, and the vault. Moving south are the public relations department, public restrooms and telephone, the entrance from the 185-car parking lot, and receptionist. To the west are the elevators, officers' platform and branch manager's section. The northern area offers the initial welcome with a lounge section at the main Wilshire Boulevard entrance. In the lobby's center is a large round slate-and-walnut writing table with recessed individual adding machines for customer convenience.

The lower level is comprised of the employee and executive dining areas, the appraisal department, employee rest rooms, the power plant, mail room, and maintenance section and storage facilities. All equipment, including the boiler, is electrically powered.

By specially-designed automatic elevators, you arrive at the balcony-shaped second floor which encircles and forms the square lightwell that pierces the entire building. Executive offices are located on this floor, each one individually designed and decorated. Also on this level are the loan, escrow, loan servicing and construction disbursement departments.

2



caisse d'épargne, los angeles

irving d. shapiro et associés architectes

Le siège de la Columbia Savings and Loan Association occupe un bâtiment de trois niveaux sur sous-sol, situé à l'angle de deux voies importantes de Los Angeles.

Le bâtiment est suspendu aux 4 piles en béton armé d'un poids respectif de 375 tonnes. A l'exception de ces éléments massifs, l'ensemble des façades est traité en pans de verre protégés par des brise-soleil dont les formes et la matière caractérisent cette architecture.

En bordure de la façade donnant sur la grande avenue, un mur-écran a été exécuté par le sculpteur Taki. Cette composition comprend 20 000 éléments de verre et de cuivre teinté, soudés entre eux et créant un motif abstrait.

En sous-sol ont été répartis les divers locaux du personnel : restaurant des cadres et cafeteria, service du courrier, chaufferie, réserves, service d'entrées, etc.

Le rez-de-chaussée est entièrement occupé par le vaste hall dont la partie centrale se développe sur toute la hauteur du bâtiment. Ce hall est éclairé par un lanterneau d'une surface inusitée (147 m²) étudié par un artiste français, le sculpteur Roger Darricarrère à partir d'éléments en verre coloré, orange, jaune, ombre, turquoise, blanc et violet. Ce lanterneau dont le poids est d'environ 25 kg/m² est le plus grand qui ait été réalisé aux Etats-Unis pour un bâtiment privé.

Le deuxième et le troisième étages se développent en mezzanine autour du hall. C'est à ces niveaux qu'ont été aménagés les bureaux de direction et les services de prêts et dépôts, etc.

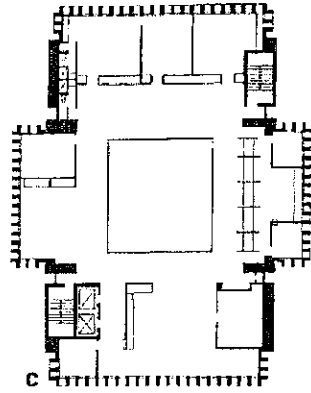
Le troisième niveau, également en mezzanine est actuellement réservé à des expositions, mais il sera utilisé dans l'avenir pour l'expansion des locaux.

Des problèmes de circulation ont été posés par la différenciation des circuits du public et du personnel et par le transport automatique des documents au moyen d'un système complexe de gaines et monte-charges.

Il a été prévu en outre l'installation de caméras de télévision et de système d'alarme, des locaux pour les installations techniques : air conditionné, contrôle du degré hygrométrique, mécanographie, reproduction des documents, etc., et un parking extérieur de 185 places.

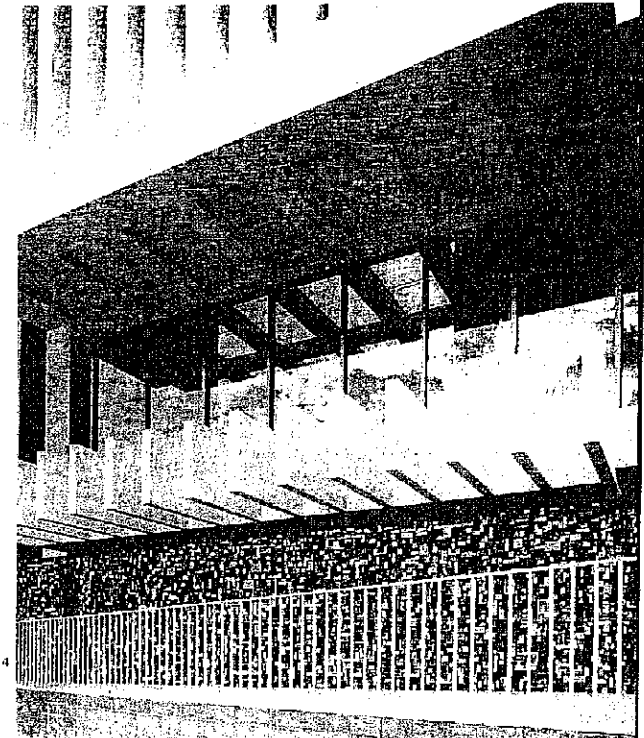
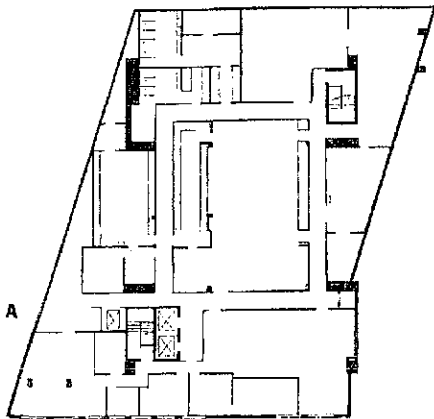
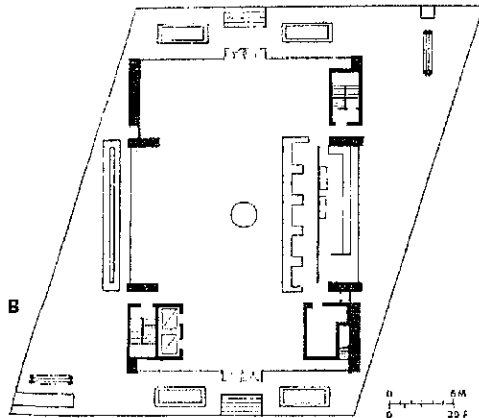
Le bâtiment a été réalisé avec le concours de Richard R. Bradshaw pour les aménagements et de Ralph E. Phillips pour les installations mécaniques.





1. Vue d'ensemble du bâtiment suspendu à 4 piles en béton armé dont l'une d'elles est visible au centre de la photographie; on remarquera les brise-soleil qui se développent devant les pans de verre des façades. 2. Effet de perspective, vue prise en cours de chantier. 3. Façade entrées. 4. Détail montrant la composition murale du sculpteur Taki.

- A. Niveau inférieur occupant toute la surface du terrain.
- B. Rez-de-chaussée; la dénivellation entre les avenues et la configuration du terrain ont conduit l'architecte à placer le bâtiment sur une base animée par des fontaines et miroirs d'eau.
- C. Etage ourari; au centre, vide ou hall occupant toute la hauteur du bâtiment; sur les poutres: bureaux.



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SAM JAFFE, Editor and Publisher

MEMBER
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CHAMBER OF
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(Construction
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CTI Announces 1965 Tile Award Winners

Installations of marble tile on the Union Bank operations building and Columbia Savings and Loan Association building, both located in Los Angeles, have been judged as outstanding tile jobs for 1965, according to officials of the Ceramic Tile Institute.

A prominent feature of these buildings was the extensive use of split-faced marble tile, supplied by Walker & Zanger Inc. (West Coast, Ltd.), Glendale.

Columbia Savings and Loan, judged as the best commercial installation, earned coveted CTI awards for architect Irving D. Shapiro, AIA, builder Ruane Corp., and tile contractor Selectile Co.

Ground To Roof

Dark green split-faced marble tile, which has a rugged unpolished stone appearance, was installed from ground to roof level on both exterior and interior surfaces at the new headquarters of the institution.

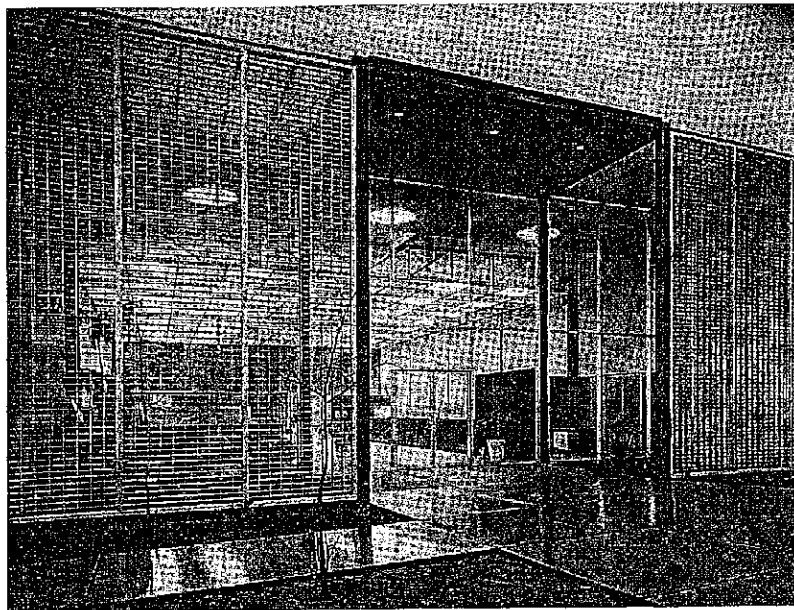
These tiles are two inches by six inches known as "Marspac."

Walker & Zanger also supplied a six-inch by 12-inch light colored polished and filled Travertine marble tile which was installed on interior surfaces from floor-to-ceiling and a six-inch by 12-inch green-veined marble tile which was installed on walls in the executive restrooms.

Froehlich Architect

Arthur Froehlich & Associates, AIA, earned the CTI architectural award for the Union Bank structure. Also honored were builders Chotinar & Gumbiner and Marley Construction Co., and Selectile Co.

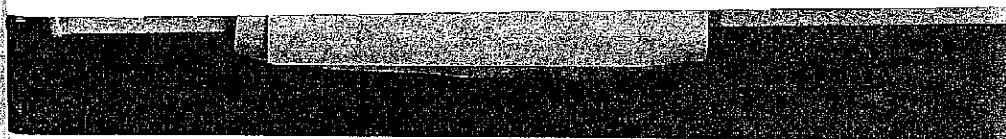
The outstanding ceramic tile exterior featured a combination use of Cipollino-green split-faced marble tile ("Marspac") running from ground level to rooftop on sections forming a right angle at Olympic Blvd. and Hope St., and sage-colored 12-inch by 12-inch Franciscan Contours CV set on a diagonal on large curtainwall sections running the length and width of the building.

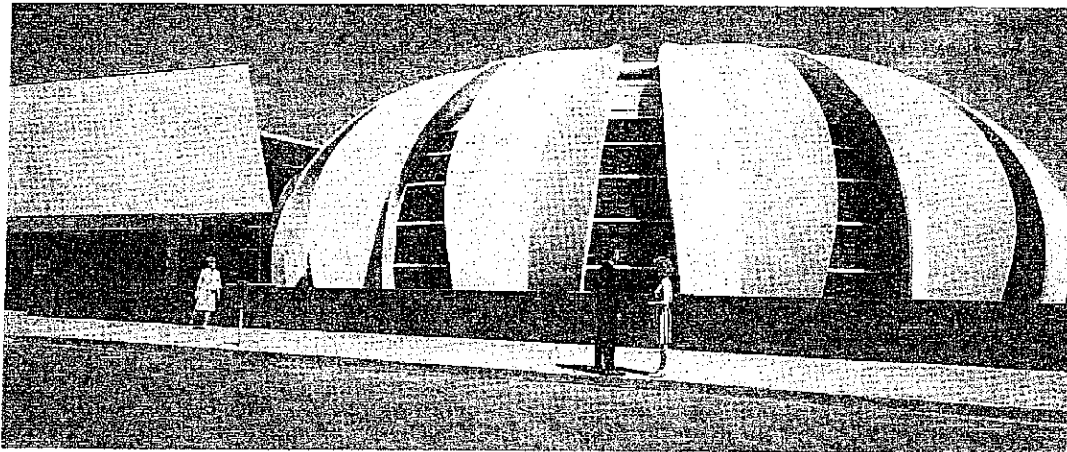


(174) Craig Ellwood, South Bay Bank, Manhattan Beach, California, 1957 (Marvin Rand).

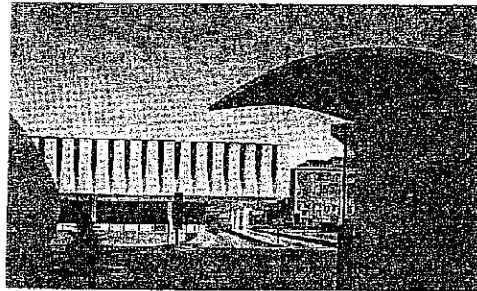
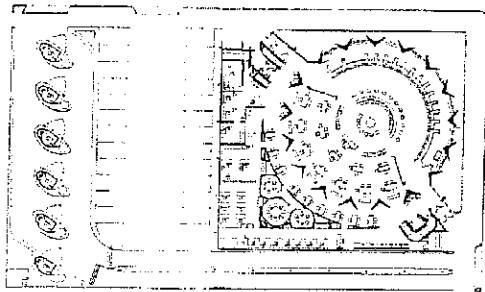
exquisitely detailed glass box with a full window wall that is recessed at the main entrance, with steel trusses exposed at the ceiling of the banking room. Ellwood used blue, heat-absorbing wireglass and an interlocking grid of aluminum bars for sun control on the window walls. The public circulation path runs straight down the center of the building, with tellers and offices on both sides. The bank is the epitome of "transparent" banking. Though it has the look of a machine-made object, it has the dignity of a temple bank.³¹

In the early 1960s, architects began to merge the two aesthetics of glass and concrete. The Architect's Collaborative designed a prototype suburban branch for Chase Manhattan Bank in Great Neck, Long Island (figure 175). The New York legislature had allowed New York City banks to open branches in Westchester and Nassau Counties, and the bank wanted its new buildings to represent the best in modern architecture. The partner-in-charge, Benjamin Thompson, felt that banks should go back to looking like banks instead of retail stores. The Architect's Collaborative created a concrete waffle slab roof supported by 16 concrete columns, under which was a glass and brick banking office. The perimeter walls were recessed six feet from the outside columns, creating a wide overhang. The use of such a prominent concrete structure would convey to the customer that money was still "a serious business" and treated accordingly. The brick and brown quarry tile gave a residential feel to the





Henrich-Bleasig photos



Six drive-in teller booths, connected by tunnel to the main building, are set under precast leaf forms echoing the dome

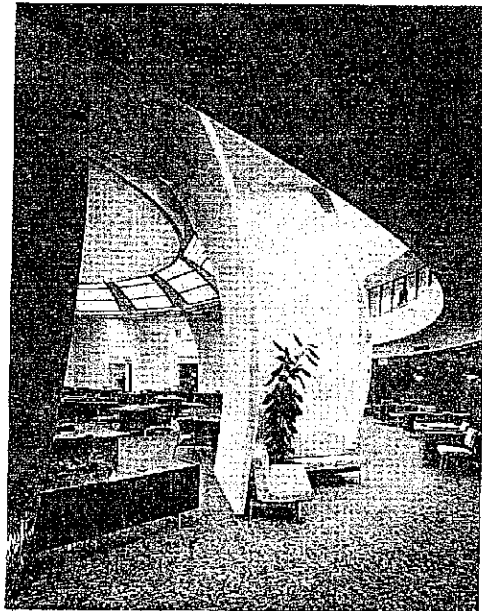
SCULPTURAL APPROACH TO A NATIONAL BANK

*Wyoming National Bank
Casper, Wyoming
ARCHITECT: Charles Deaton*

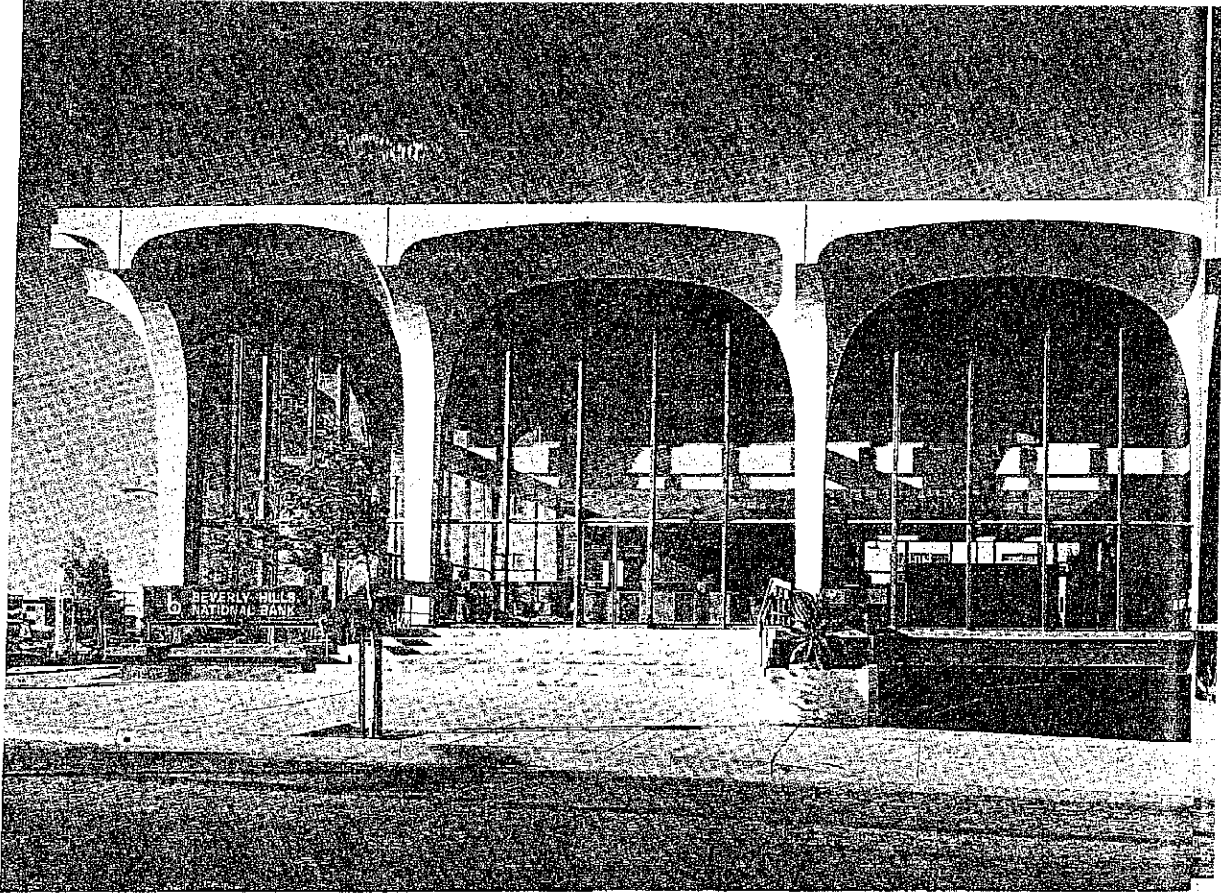
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According to the architect, floor space needs of this Wyoming bank conventionally shaped the initial planning, but the final form of the building "was conceived as sculpture and was developed in sculptural techniques." While judgments of the esthetic results are not likely to be unanimous, the plan seems to work.

A 94-foot dome, supported by 17 leaf-shaped precast concrete exterior blades, provides a clear span of 86 feet in the banking rotunda. Blades were cast by the contractor in hand-shaped earth molds. Spaces between blades are filled with flat segments of gray glass, behind which draperies in Austrian pleat are horizontally operated on bowed retainers. The dome is set into one corner of a basically square two-story building with precast panel walls into which windows appear to have been scooped with a rounded chisel.

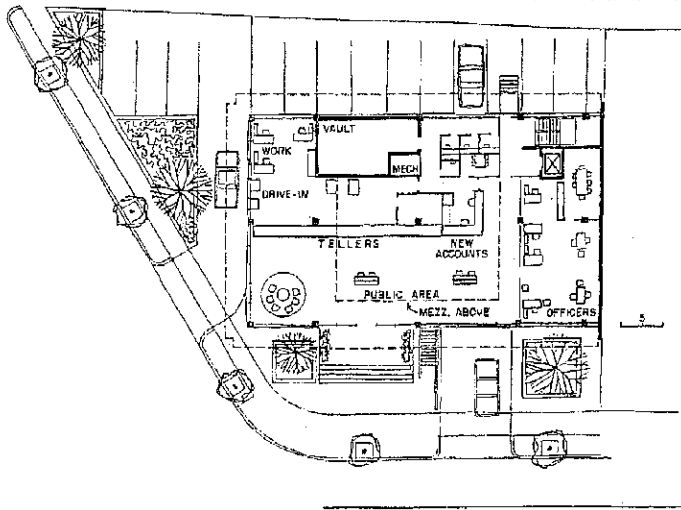


ARCHITECTURAL RECORD June 1965 197

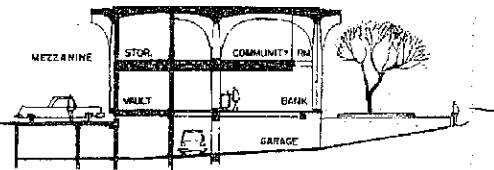


Richard Gross photos

A BANK IN A SMALL NEIGHBORHOOD



The site for this handsome bank building is a very small plot in a shopping center near a residential area. Eight vaults—the two at each outer end are designed on a slightly smaller module than the center four—give the building exterior a distinctive appearance and on the interior work with the sculptured columns to produce unusual spaces. The banking area is two stories high, unexpectedly spacious. A mezzanine floor at the other end of the building contains a meeting room for public use. Interiors are finished





ARTIST—Roger Darricarrere works on master pattern for the 1,300 sq. ft. mosaic skylight for Columbia Savings and Loan Assn.'s Wilshire Office.

Stained Glass Skylight Feature of New Office

The biggest, most colorful color, quality, amount of and probably the only bubble, and thickness, stained glass skylight in a commercial building in Southern California is being made for the new home office building of Columbia Savings and Loan Assn. hammer and placed on the under construction on Wilshire Blvd.'s "Miracle Mile" area.

This unusual, multi-colored skylight, which will cap a three-story-high light-well centered in the savings and loan office, will cost more than 10,000 dollars. The pieces of thick stained glass covering an area of almost 1,300 sq. ft.

Cost at \$40,000

Designed by Roger Darricarrere, French artist and sculptor, the 36-ft.-square skylight will cost approximately \$40,000.

Darricarrere is composing the skylight in his studio on San Fernando Rd., using 78 panels. Each panel is designed from a paper pattern that outlines hundreds of different glass pieces from one to seven inches in size, from specially-designed kilns, he makes his own stained glass to control its color.

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Comment Letter No. 10

October 17, 2008

Mike Buhler, Director of Advocacy
Los Angeles Conservancy
523 West Sixth Street, Suite 826
Los Angeles, California 90014

Response No. 10-1

The commenter purports to set forth the legal requirements of CEQA and states that the information provided is substantial evidence of the historical significance of the Columbia Savings building, thereby requiring a project alternative that studies retention and preservation of the building. The commenter maintains that substantial evidence supports a fair argument that the project will cause a substantial adverse change to an historical resource. As a preliminary matter, the "fair argument" standard does not apply when, as in this case, the lead agency has prepared an EIR. Instead, in order to comply with CEQA, the EIR's conclusions must be supported by substantial evidence. The Chattel report, prepared by a recognized expert and based on an intensive study of the building, provides substantial evidence that the building is not an historical resource under CEQA.

In any event, the commenter fails to provide substantial evidence to establish the historic significance of the 5220 Wilshire Boulevard property, the former Columbia Savings building, as an historical resource. It would necessarily follow, that should the California Register eligibility of the Columbia Savings building be firmly established, its demolition as proposed would result in a significant adverse impact under CEQA. New information is provided in the commenter's letter such as the fact that when the building was newly constructed it was published in a leading professional architectural magazine in France, that the stained glass artist studied with renowned Belarusian-French artist Marc Chagall, and that the fountain was designed by a local artist, Taki (though no additional information on this artist is provided by the commenter). However, this new information does not adequately establish the building's eligibility for listing in the California Register or constitute substantial evidence of a new significant impact or a substantial increase in a significant impact disclosed in the Draft EIR or new information requiring recirculation of the Draft EIR pursuant to *State CEQA Guidelines* Section 15088.5.

The commenter requests that the EIR evaluate an alternative that retains and preserves the Columbia Savings building. However, *State CEQA Guidelines* Section 15126.6 provides that an EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of alternatives to the proposed project that "would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant impacts of the project." In this case, the Columbia Savings building is not historic, and removing the building would not result in a significant impact to

historic resources. Therefore, including an alternative to preserve the building would not lessen any significant impacts posed by the project.

Even if the alternative requested by the commenter were to lessen a significant environmental effect, the alternative is not feasible. *State CEQA Guidelines* Section 15364 defines “feasible” as capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. Such factors include, among other things, site suitability, economic viability, availability of infrastructure, general plan consistency, jurisdictional boundaries, and the applicant’s access to an alternative site. In terms of site suitability and consistency with the City’s General Plan, retaining the bank building would create significant design constraints and inhibit implementation of the City’s planning goals. Residential uses cannot be developed within the bank building due to its open atrium or, central court. Moreover, retaining the bank building would make it infeasible to excavate that portion of the project site for subterranean parking.

Keeping the bank building would result in the loss of approximately 100 units at the corner of Wilshire and La Brea. Forty units could be relocated to the east side of the project by extending the building “fingers” to the east where the townhomes are currently located, and by enclosing the courtyard areas, again at the eastern edge. However, this could result in an incompatible height and scale along Sycamore that could have physical land use, cultural resource, and visual character impacts on the homes across Sycamore. The remaining 60 units would be lost unless the building height was raised, which would result in the same potential impacts and significantly increase costs due to a different construction type.

The frontage along Wilshire Boulevard, where the bank building is located, is zoned at the highest density and is more suitable for higher density residential and mixed use commercial development than other portions of the project site. Retaining the bank would preclude redevelopment of this portion of the project site, in conflict with Objective 1-2 of the Wilshire Community Plan to reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations, and existing bus route stops. In addition, retaining the bank building would result in a loss of approximately 50 percent of the proposed retail uses along Wilshire Boulevard in an area that is underserved by high quality retail. The bank building itself is not viable for retail use, as evidenced by the fact that it has not been used for commercial use since 1994. Thus, retaining the bank would interfere with Objective 2-1 of the Community Plan to preserve and strengthen viable commercial development and provide additional opportunities for new commercial development and services within existing commercial areas.

Retaining the bank would also interfere with several project objectives. For example, keeping the building would require residential density to be pushed to the south, adjacent to sensitive residential uses along

Sycamore Avenue. This would interfere with the objective to develop the site with structures that are compatible with existing residences to the east in terms of scale, mass, and bulk. As noted above, retaining the bank building would yield fewer units and therefore would not meet the project object of providing multi-family residential housing in an urban area of the City of Los Angeles. Also, maintaining the bank building and thereby limiting the amount of mixed-use development along Wilshire Boulevard would conflict with the City's walkability guidelines and would interfere with the project objective to promote walkability. Also, the current bank building is on a plinth and there would be very little room to add landscaping and other pedestrian friendly elements and still meet the City's sidewalk and setback requirements. This would also interfere with the project objective to improve and integrate the streetscape along Wilshire Boulevard and La Brea Avenue.

Response No. 10-2

The text beginning on page 8 of the Chattel report and summarized beginning on page IV.C-3 of the Draft EIR describes both the architecture and history of the Columbia Savings building, including both exterior and interior features as well as alterations, property history and an extensive discussion of both the architect and architectural style. Consistent with accepted professional practice, this detailed description identified all decorative features present in the building as well as information about the architect and artist responsible for their creation when that information is available. It should be clear, however that most buildings that are not of a strictly utilitarian nature contain decorative features and these decorative features always have someone responsible for their creation. The mere fact that a building has decorative elements or that its creation can be attributed to a person or persons hardly constitutes significance. The commenter also asserts that the two 85-foot-tall signs are sculptural in nature and somehow add to the monumentality of the building. Use of florid language to describe otherwise straightforward and utilitarian features of building or its site does not establish architectural significance.

While not explicitly stated, the commenter seems to be arguing that the Columbia Savings building is significant under California Register criteria 1 and 3. Under criterion 1, a building would considered to be significant if it was associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States. Under criterion 3, a building would be considered to be significant if it embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values. In addition, while the California Register does not maintain an arbitrary cutoff for eligibility at 50 years of age, it does provide a special consideration for historical resources achieving significance within the past 50 years. Under Section 4852 (d)(2):

Historical resources achieving significance within the past fifty (50) years. In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly

perspective on the events or individuals associated with the resource. A resource less than fifty (50) years old may be considered for listing in the California Register if it can be demonstrated that sufficient time has passed to understand its historical importance.

While the California Register does not require an evaluation of exceptional importance for resources that are not yet 50 years of age, National Register guidance for such properties is nevertheless instructive. For properties that have achieved significance within the last 50 years National Register guidance states (*National Register Bulletin 22: Guidelines for evaluating and nominating properties that have achieved significance within the last fifty years*, National Park Service, undated, 9):

Justifying the importance of properties that have achieved significance in the last fifty years...The rationale or justification for exceptional importance should be an explicit part of the statement of significance. It should not be treated as self-explanatory...It must discuss the context used for evaluating the property. It must demonstrate that the context and the resources associated with it can be judged to be "historic." It must document the existence of sufficient research or evidence to permit a dispassionate evaluation of the resource.

As far as California Register criteria 1, the commenter appears to be arguing that the Columbia Savings building contributes to the cultural heritage of the United States as an exemplar of postwar bank design. The most convincing evidence offered in the commenter's letter is the stated opinion of the Columbia Savings building's importance by the author of a book on the history of bank design entitled *Monuments to Money: The architecture of American banks* (Jefferson, NC: McFarland & Company, Inc., 2005). The commenter quotes the book's author, Charles Belfoure, a Maryland-based architect, as stating in an interview with the commenter that the Columbia Savings building is "a modernist way of interpreting a classical bank's composition." In that interview, given on September 20, 2006, the author further noted that the Columbia Savings building's combination of quality design, artwork, and monumental signage make it "a really excellent example of this time period ... a complete package." While the opinion of a design professional who has investigated the building typology of banks does carry some weight, it hardly constitutes a statement of this particular bank's significance. While the author obviously thinks highly of this building, as demonstrated in his spoken comments on the subject, it is not a building that he thought so representative or exemplary that he included it or referred to it within his book. Moreover, it is unclear whether the commenter or the author considers the Columbia Savings building significant at the national or regional level within the context of postwar bank design. The commenter included, as an attachment to his letter, selected pages out of Belfoure's book with a photograph of a bank by a very well known and highly regarded California architect (Craig Ellwood), but the relationship of the Columbia Savings building to either this bank building, or other photographs of postwar bank buildings included as attachments, was in no way explained.

Under California Register criterion 3, the commenter appears to rely on the building being of a stand-alone retail subtype including banks of a unique design incorporating integrated art. However, the commenter never explicitly states this, and cites disparate factors that leave the reader to formulate his or her own historic context. The importance of this context has not been fully developed as provided in the guidance cited above and therefore there is no way to evaluate the contribution of this particular building at either a national or regional level. Other proffered “evidence” is unsubstantiated and un-cited, including the assertion that the architect, Irving Shapiro, may have received the commission through a design competition.

If a comparison to other stand alone bank buildings of the period or to other works of Brutalist architecture were made, the obvious comparison to the work of local architect Kurt Meyer would be appropriate. Meyer designed at least two Brutalist bank buildings in the 1960s era, Lytton Savings and Loan Association (1965) located at 300 W Second Street in Pomona and Liberty Savings & Loan (1966) located at 1180 S Beverly Drive in Los Angeles. Both of these buildings are highly representative of the stand alone retail bank building of the period and the latter is featured with a photograph in David Gebhard and Robert Winter’s *A Guide to Architecture of Los Angeles and Southern California* (Santa Barbara: Peregrine Smith, 1977) as the representative example of Brutalism regionally. Again, if the comparison were appropriately made, the Columbia Savings building, which falls into a hybrid design employing elements of International Style and Brutalism, would be viewed in the context of like properties. As stated on page 13 of the Chattel report and summarized on page IV.C-7 of the Draft EIR:

[T]here are times when combinations of diverse architectural styles create a structure that is architecturally insignificant. In the case of 5220 Wilshire Boulevard, the assortment of stylistic elements adds up to something that is both more and less than the sum of the parts. Expressing the geometric massing and vertical slot windows typical of Brutalism negates the horizontal and volumetric emphasis of the International Style. The application of paint and stone veneer on the exterior, while appropriate for International Style buildings, completely misses one of the central principles of Brutalism; the expression of raw materials, particularly exposed concrete. In an effort to combine these two styles, the architect created a structure that fails to effectively express or celebrate either style. Thus, the building is neither architecturally distinctive nor a meaningful and unique architectural expression. Likewise, the stained glass skylight and the sculptural fountain, while two of the most articulated design features of the building, are not highly-skilled or representative examples of stained glass or sculptural works, and they do not stand separately on their own as historic resources.

Application of California Register criterion 3 requires some additional discussion beyond the commenter’s contentions in order to demonstrate that the building is California Register eligible and therefore an historic resource under CEQA. The commenter fails to make any comparison of the Columbia Savings building to like properties other than by offering images of buildings shown in attachments. It is unclear to the reader exactly what these images are intended to illustrate (for example,

there is no information provided as to whether these buildings are extant, are representative examples of the period, how is their significance demonstrated, whether the examples were previously evaluated, or if they are even included in scholarly publications). As such, the information provided in the letter does not constitute substantial evidence that the building is an historic resource. In contrast, the DEIR, and the Chattel report attached as an appendix thereto, provide abundant evidence that the building is not an historic resource.

Response No. 10-3

In addition, also in reference to California Register criterion 3, the commenter appears to be arguing that the Columbia Savings building possesses high artistic values because it contains integrated art components. The two artworks which are noted in the Chattel report and commenter's letter are the stained glass ceiling and the metal fountain, both of which appear to have been designed and fabricated specifically for this building. The Chattel report identified both the École des Beaux Arts trained stained glass artist, Roger Darricarrere, and the dalle de verre-technique used. The commenter notes that Roger Darricarrere studied under Marc Chagall and won an award for use of the dalle de verre technique at the 1964 New York World's Fair. While the commenter credits Darricarrere as "helping to introduce the technique to America after World War II," there is no evidence offered to support an assertion that he is one of the primary people associated with the technique or its dissemination in the United States. In fact, it seems that the commenter may be simply overstating the role of Darricarrere based on information provided in the Chattel report on page 10 where it is noted that the artist "immigrated to the United States after World War II to work with Harold W. Cummings, who had recently established the first American studio to design, fabricate and install dalle de verre glass." The commenter also states that the glass installation may be one of the largest in the City, if not in the state (and this is, in fact, corroborated by the French article which shows that it was not only the largest in the state at the time, but it was the largest installation of its kind in the US for a private building). However, the mere physical attribute of size does not impart significance to a work of art; if size were indeed to dictate the significance of a work of art, rather than the originality of the idea conveyed or the skill by which the artwork was rendered, then the creation of works of art would be reduced to a contest in which whoever could gather the most material together would be declared the winner. The commenter fails to provide a context for the creation of the dalle de verre glass installation at the Columbia Savings building that would convey why this installation is particularly skilled when considered either among other installations in Darricarrere's oeuvre or when considered in relation to other dalle de verre installations in the City, the region or the nation.

The 10-story Glendale Federal Savings & Loan building at 9450 Wilshire Boulevard at the southeast corner of Beverly Drive in Beverly Hills, designed by architects Langdon & Wilson and constructed in

1968, offers an exemplary use of dalle de verre-type stained glass in contrast to the installation at the Columbia Savings building. The overhanging cornice-like element at the top of the building on all four elevations integrates stained glass. At 9450 Wilshire Boulevard, the dalle de verre glass is incorporated into the exterior of the building in a particularly innovative way that makes the artwork accessible to the public at all times, whether back lit by the sun or illuminated at night. This innovative installation, when compared to the installation at the Columbia Savings building, not only demonstrates that this form of stained glass was in widespread use during this period, but also offers an exemplary example of its application.

Nor is a context provided for the significance of the Columbia Savings building within the context of other bank buildings of the period that integrate art, which was commonplace in bank design and other building types of the period. In the Los Angeles region, by far the most exemplary bank buildings that integrate art were those designed and constructed between circa 1951 through 1970 by artist Millard Sheets for Howard Ahmanson, chair of Home Savings of America. Millard Sheets (1907 through 1989) was an artist, architectural designer, and educator, best known for his figurative painting on canvas. Howard Ahmanson (1906 through 1968) was a successful banker and philanthropist. Home Savings, at the time of Ahmanson's death, was the largest savings and loan in the country. Ahmanson and his wife, Caroline, were major donors to and leaders of the Los Angeles County Museum of Art and the Music Center. The earliest extant bank building designed by Sheets Designs for Ahmanson & Co is located at 9245 Wilshire Boulevard in Beverly Hills at the "T" intersection with Rexford Drive. Completed in 1954, this bank building, with its integrated art consisting of mosaic tile, stained glass, and sculpture, was an immediate success. It became the prototype for future bank designs and with approximately 40 buildings designed during Sheets' 17-year relationship with the bank using the same integration of art, served as a "brand" for the company. As noted by esteemed architecture critic Aaron Betsky in the *Los Angeles Times* article entitled "Marble Palaces of Home Savings Remind us what the Money's for" (August 29, 1991, J2), "The marble box tells you that this is a safe, dependable place to store your money, while all the art gives you a picture of what you are saving for." The bank branches designed by Sheets were clearly a sound investment and branding effort, but also were a successful attempt to demonstrate Ahmanson's cultural patrimony regionally. The commenter does not make any of the necessary comparison of the Columbia Savings building to like properties such as the early Home Savings branches. In making such an effort, the Columbia Savings building pales by comparison in its integration of artwork as a component of the architectural program.

California Register criterion 3 also addresses significance for an association with "high artistic values." The commenter provides limited information with regard to integration of artwork in the building program, does not identify that by this period such integration was commonplace, and fails to compare

like properties, such as the Home Savings branches where integration of artwork was a key component of each branch bank, but also served as a culturally patrimony regionally.

Response No. 10-4

As noted above in **Responses No. 10-1** through **No. 10-3**, the information provided by the commenter does not clearly establish the Columbia Savings building's historic or architectural significance employing California Register criteria or guidance. CEQA requires that an EIR study range of alternatives that may substantially reduce or avoid the significant impacts of the proposed project. The Columbia Savings building is not a significant historical resource and its demolition would not result in a significant impact. Therefore, study of a preservation/retention alternative is not required.

From: zachary shepard [zjshepard@gmail.com]
Sent: Tuesday, September 02, 2008 9:59 AM
To: srimal.hewawitharana@lacity.org; jimmy.liao@lacity.org
Subject: Comments ENV 2007 1604 EIR

Planners,
I am writing to comment on the proposed project on Wilshire and La Brea (ENV 2007 1604 EIR).

I am a six-year tenant resident at 654 S. Detroit St. just north of Wilshire - one block from this development. You probably get a lot more comments from anti-development NIMBYs, so I wanted to pipe in. I am disappointed that this project is so dramatically scaled back from what was presented at the scoping meeting. The design and scale of the original development was so much more appropriate to this site. This is one of the busiest intersections in the City, and it is totally appropriate to place a high density tall building here. I am especially disappointed that the "platform/podium" will now be just 20 feet high on Wilshire. This intersection easily supports a much much taller building.

1

And for the love of god - no more yellow stucco on Wilshire - it's ugly. This development should be architecturally significant on a such a significant site.

Zach

--
Zachary J. Shepard, Esq.
Glickman & Glickman
9460 Wilshire Blvd., Suite 830
Beverly Hills, CA 90212
(310) 273-4040

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10/15/2008

Comment Letter No. 11

September 2, 2008

Zachary Shepard, Esq.
Glickman & Glickman
9460 Wilshire Boulevard, Suite 830
Beverly Hills, California 90212

Response No. 11-1

This commenter expresses a preference for an earlier project design. The architect has gathered considerable feedback on the exterior design, and the applicant will take these comments into consideration as the building design is further developed. The comment will be provided to the decision makers for their review and consideration prior to any approval action on the project. As this comment is not directed at the environmental analysis or conclusions in the Draft EIR, no further response is required.

From: Myrna Dwyer [ziggyseb@gmail.com]
Sent: Thursday, October 09, 2008 12:11 PM
To: Srimal.Hewawitharana@lacity.org
Subject: Comments on Draft EIR for the Wilshire and La Brea Project/Case # ENV-2007-1604-EIR

To: Srimal Hewawitharana, Project Coordinator
Wilshire and La Brea Project
EIR Case No: ENV-2007-1604-EIR

Dear Mr. Hewawitharana,

I am writing you to comment on the Draft EIR for the Wilshire and La Brea project.

I think the scale and the size of the project is too large. The developer is projecting 1220 new residents for this project. With the current state of the economy, I think people will be doubling up and sharing apartments to save money, and there will probably be 1500 new residents in this development.

1

Our entire Sycamore Square community, bounded by Olympic Boulevard, La Brea Avenue, Wilshire Boulevard and Highland Avenue currently only contains about 1200 residents. The new project will more than double the size of our community. We are already having major traffic congestion problems on Wilshire Boulevard and on 8th Street. This new project will make traffic much worse, despite what the developer says.

2

The developer has included 1083 parking spaces for residents and their guests. There is currently not enough neighborhood parking for residents. The new project will make neighborhood parking even more difficult. Since we may not get a subway extension for 20 years, one can only assume that an excess of 200 - 400 new residents will be competing with the current residents for street parking.

3

I do not think that the modern, blocky architectural design of the project fits in with the character of our neighborhood, which is mainly composed of small apartment buildings, duplexes, and private homes constructed in the 20's and 30's. Many of our homes are Spanish Revival, and I would like to see at least part of the new project, at least, echo that design.

4

The developer plans to remove an Art Deco structure, the Metroplaza mini-mall (located on La Brea Avenue, between Wilshire and 8th streets), and a Brutalist - International Style building, the original Columbia Savings Building (currently known as Wilshire Grace Church) at the Southeast corner of Wilshire and La Brea. I believe that both of these buildings have architectural merit and therefore should not be destroyed. The Columbia Savings Building's interior features a stained-glass ceiling by French artist Roger Darricarrere, who studied under Marc Chagall and had a thriving glass studio in Southern California. He taught other glass sculptors and he created many stained glass windows in churches and other buildings in Southern California. One of his stained-glass windows, called "Light of the World," was featured at the 1964 New York World's Fair, and is now in a Tujunga Church.

5

I believe that this piece of stained glass art should be preserved, along with the Columbia Savings

10/15/2008

Building. Contrary to the developer, I believe that this building is very architecturally distinctive.

5

I also adamantly oppose the developer's request for a zoning change on the West side of the 700 block of South Sycamore. This project is already way too dense for the neighborhood.

6

Regarding parkland and open space, I would like the developer to provide a lot more green space as part of the Wilshire La Brea project, rather than paying an in-lieu fee to the City. We do not have enough green space or parks in our area at this time.

7

I realize that some of these issues, in response to the previous comment period, have been discussed in the current Draft EIR; but I do not feel that the above issues have been adequately addressed or satisfactorily resolved.

8

Thank you for your time.

Respectfully,

Myrna Dwyer
746 South Mansfield Avenue
Los Angeles, California 90036

10/15/2008

Comment Letter No. 12

October 9, 2008

Myrna Dwyer
746 South Mansfield Avenue
Los Angeles, California 90036

Response No. 12-1

The commenter discusses the “Sycamore Square community” and potential impacts to its population related to project implementation. Section IV.I, Population and Housing, of the Draft EIR sets forth significance thresholds for the potential impact related to the increased residential population that would result from project implementation, and includes analysis regarding whether the project impacts and cumulative impacts result in significant impacts compared to these thresholds. The Draft EIR analyzed the population and housing impacts at the Census Tract and Community Plan levels; however, there are no municipal data or verifiable information about the “Sycamore Square community” with regard to its current population or its planned population growth; therefore, no analysis at the neighborhood level could be performed.

As discussed on page IV.I-6 of the Draft EIR, based on the 2000 Census, an average of 2.17 persons occupied multiple family units within Census Tract 2110, where the proposed project would be constructed.¹ Census Tract 2110 extends from West 3rd Street/Beverly Boulevard to the north, 8th Street/Wilshire Boulevard to the south, South Plymouth Boulevard to the east and North June/South La Brea to the west.² In 2000 the population of Tract 2110 was 4,309, reflecting a decrease of approximately 4 percent since the 1990 reported population of 4,488.^{3,4}

While the exact occupancy rate for the proposed housing units is unknown, it is anticipated that the occupancy rate for multiple family units would be comparable to the year 2000 baseline Census data. Applying the 2.17 persons per multifamily unit factor to the proposed 562 residential units associated with the proposed project would result in the introduction of approximately 1,220 new residents to the project site. The new residents from the project would result in an increase of 28 percent over the 2000 population and 27 percent increase from the 1990 population. As no population projections are provided

¹ US Census Bureau. Profile of General Demographic Characteristics: 2000. Census Tract 2110, Los Angeles County, California. Available on-line at: <http://factfinder.census.gov/>. 2007.

² See boundaries on map for Census Tract 2110, <http://factfinder.census.gov/>. 2007.

³ US Census Bureau, *Profile of General Demographic Characteristics: 1990*, Census Tract 2110, Los Angeles County, California. Available on-line at: <http://factfinder.census.gov/>. 2007.

⁴ US Census Bureau, *Profile of General Demographic Characteristics: 2000*, Census Tract 2110, Los Angeles County, California. Available on-line at: <http://factfinder.census.gov/>. 2007.

at the Census Tract level, no analysis can be performed on the potential impact of the project at the Census Tract level.

The Wilshire Community Plan includes population projection data through 2010. The data suggests that population within the Wilshire Community Plan Area will grow at a rate of 7.2 percent between 2005 and 2010, from 314,602 to 337,144 persons (an increase of 22,542 persons).⁵ If the occupancy rate remains the same after the project's completion, anticipated to be in 2010, and assuming an occupancy rate of 2.17 persons in each of the housing units, the resulting population would be approximately 1,220 persons, or approximately 0.36 percent of the estimated 2010 population of 337,144 persons in the Wilshire Community Plan Area.

Based upon this information, the project would be consistent with the projections made for the Wilshire Community Plan Area. The commenter has not addressed the adequacy or propriety of significance thresholds and has offered no evidence that any perceived increase in demand for municipal services and traffic congestion results in a significant impact compared to these established thresholds.

The commenter asserts that due to the current economy, tenants will double up and the project population will probably be 1,500 persons. However, the commenter offers no substantial evidence to support her opinion. Therefore, no further response is necessary or can be provided.

Response No. 12-2

With the implementation of the proposed mitigation measures MM-TRA-1, MM-TRA-2, and MM-TRA-3 identified on page IV.K-37 of the Draft EIR and adopted by LADOT, all significant project traffic impacts will be reduced to less than significant levels. Also see **Response No. 7-3**, above.

Response No. 12-3

The commenter suggests that the amount of parking proposed by the project is inadequate and would result in spillover parking impacts to the neighborhood. However, the commenter offers no substantial evidence to support her opinion. The project complies with City code requirements by providing a total of 1,083 parking spaces, including approximately 148 retail spaces, 80 restaurant spaces, and 855 residential spaces. A summary of the project's parking requirements described above as compared to its proposed parking supply is provided in Table IV.K-9, Code Parking Ratios and Required Spaces, on page IV.K-36 of the Draft EIR. Furthermore, residential guest parking will be allowed to use the commercial parking during off-peak commercial periods.

⁵ City of Los Angeles, *Wilshire Community Plan*, 2001.

City code parking requirements have been calculated based on the sum of the peak parking demands for each individual use. However, simply adding the peak parking demand per code for each individual uses in a mixed-use development produces an overall parking demand estimate that is too high.

The concept for shared parking is that a single parking space can be used to serve two or more individual uses without conflict. In other words, hourly parking demand differs between uses so that one space may provide parking for several uses during different times of the day. Furthermore, opportunities are available in mixed-use projects to reduce overall parking demand due to the effects of a captive market. Short walking distances between uses allows visitors to patronize more than one on-site use on a single trip to the project site. Therefore, stand alone parking requirements can be factored downward to account for the internal market support between complementary land uses.

Using the Urban Land Institute's shared parking model, a 6 to 8 percent reduction of the code parking demand for this project would be realized. However, the project would be parked to the full City code requirement of 1,083 spaces. Therefore, the amount of parking provided is likely to exceed the actual parking demand created by the project.

Significant spillover parking impacts will not occur because the parking provided by the project is more than adequate to meet anticipated demand. Furthermore, Residential Parking District Number 36, located on the east side of Sycamore Avenue across the street from the project site (and also the west side of Sycamore Avenue south of 8th Street) will restrict the availability of parking for occupants and visitors to the project who may choose not to park within the project parking garage. In addition, the project will provide street improvements to the west side of Sycamore Avenue, including the addition of 14 parking spaces. Currently, parking is not allowed on the west side of the street, and the additional parking spaces will enhance parking availability in the neighborhood.

Response No. 12-4

The commenter states her opinion that the modern, blocky architectural design of the proposed project does not fit in with the character of the neighborhood. The residentially scaled edge of the building along Sycamore Avenue has been further developed based on neighborhood comments to reflect the existing context in scale, texture, and materials. Please see **Response No. 28-9** for more information regarding public outreach for this project made by the project Applicant.

As noted in **Response No. 7-2**, the project steps down from the Wilshire and La Brea frontages to create a three-story envelope with apartment units accessible from grade along the west side of Sycamore Avenue. The overall scale and mass of this portion of the project makes every reasonable attempt to meet the scale and character of the east side of Sycamore Avenue. The commenter further states that at least

part of the new project should echo the design of the 1920s and '30s Spanish Colonial Revival homes in the neighborhood. This concept of treating a new contemporary building in a stylistic manner that “matches” the surrounding adjacent historic buildings is often popularly cited, by design professionals and the public alike, as an appropriate means by which to sensitively respond to those historic buildings. However, this approach, in fact, runs contrary to accepted professional practice as established in guidance provided by the National Park Service, the primary public agency entrusted with safeguarding the nation’s historic properties for the future. Guidelines established by the agency serve as the benchmark by which successful preservation practice is judged.

The most definitive guidelines for preservation design practice are those set forth in the Secretary’s of the Interior’s Standards for the Treatment of Historic Properties (Secretary’s Standards, National Park Service, 1995). Those standards establish that the best way to respect existing historic properties is not to mimic them, but to complement them with new buildings that clearly communicate their own time and place. Further guidance to the appropriate approach to new building design where historic resources are present is provided in National Park Service publications such as Preservation Brief 14: New Exterior Additions to Historic Buildings: Preservation Concerns (Kay D. Weeks, National Park Service, 1986). Some of the most substantial information on this subject is provided in a section of that brief entitled “Protecting the Historic Significance: Making a Visual Distinction between Old and New.” This section not only describes the appropriate approach for additions to an historic building, but it also explains that the same approach could be applied equally to the preservation of districts, sites, buildings, structures and objects. The section also takes care to note the common preservation fallacy, also suggested by the commenter, that a new contemporary building should “match” the adjacent historic building and the reason that such an approach is inappropriate:

Rather than establishing a clear and obvious difference between old and new, it might seem more in keeping with the historic character simply to repeat the historic form, material, features, and detailing in a new addition. But when the new work is undistinguishable from the old in appearance, then the “real” National Register property [or other historic property] may no longer be perceived and appreciated by the public.

An attempt to mimic the architectural style of the nearby historic buildings would not generally be in conformance with the Secretary’s Standards. As discussed in more detail on page 37 of the historic resources assessment provided in Appendix IV.C to the Draft EIR, the contemporary design of the proposed project, particularly along the west side of Sycamore Avenue, is an appropriate contemporary interpretation that is compatible in use and scale, and speaks of its own time and place.

Response No. 12-5

Please see **Responses No. 7-1** and **No. 10-1** through **No. 10-4**. Neither the Murphy dealership (Metroplaza mini-mall) nor the Columbia Savings buildings are eligible for listing in the California Register and thus are not considered historical resources for purposes of CEQA.

Response No. 12-6

As discussed in Section IV.G, Land Use, of the Draft EIR, the proposed project would require a general plan amendment and a zone change.

Without these discretionary approvals the project as proposed would not be constructed. As stated on page IV.G-15, "Implementation of the proposed project would require a general plan amendment to change the designation for the southernmost portion of the project site along La Brea Avenue from General Commercial to Regional Center Commercial." Also as discussed on page IV.G-16, the Zoning Code designates the project site as [Q] C4-2-CDO along Wilshire Boulevard, C2-1 along La Brea Avenue, and [Q] C2-1 along Sycamore Avenue, which all permit commercial and residential uses within these zones. Additionally, Height District 1 associated with the C2-1 zone along La Brea Avenue and the [Q] C2-1 along Sycamore allow a maximum FAR of 1.5:1 while Height District 2 associated with the C4-2-CDO along Wilshire Boulevard allows a maximum FAR of 6:1. As portions of the project would exceed the FAR permitted under Height District 1 and the density permitted under the [Q] C2-1 zoning, implementation of the project will require that the entire site be rezoned as [T][Q]C4-2. With project approval, the general plan amendment and zone change would be adopted and implementation of the proposed project would thereby be consistent with the site's *new* zoning designation.

The commenter asserts that the project is inconsistent with the surrounding neighborhood. As discussed in Section II, Project Description, of the Draft EIR the residential floors would consist of two elements: a primary structure arranged in a "wing" configuration, which would create building "fingers" that would surround open-ended courtyards; and a smaller "bar" structure along the base edge at Sycamore Avenue. The "finger" building would be six stories plus mezzanines above the base, while the "bar" building would be two stories above the base. Overall, the "finger" building would be a maximum of 100 feet above grade, and the "bar" building would be up to 44 feet above grade. An accent tower at the corner of Wilshire Boulevard and La Brea Avenue would be up to 130 feet above grade; the highest parts would contain equipment and provide a decorative element for the building.

The courtyards would open to the east to take advantage of City skyline views and to provide a more articulated building face to the adjacent residential neighborhood on Sycamore Avenue. The secondary "bar" building would be used, together with the flats at grade, to diminish the height of the structure as it fronts Sycamore Avenue, and would provide mass, bulk, and scale that is more consistent with the

residential structures located at the east side of the street. Additionally, the western ends of the “fingers” would be set back 60 feet along Sycamore Avenue while the average setback of the building would be set back 15 feet; a 5,400-square-foot linear park would be located between Sycamore Avenue and the proposed building.

Section IV.A, Visual Resources, of the Draft EIR also sets forth seven factors to determine the significance of visual character impacts and analyzes these factors with respect to the project and the cumulative development of the surrounding area. Section IV.G, Land Use, of the Draft EIR and Tables IV.G-1 through IV.G-5 specifically addresses the project’s potential impacts to visual character and its consistency with applicable local and regional land use plans. The Draft EIR concludes that no project-specific or cumulatively significant visual character or land use impacts will result. The commenter does not identify any defects in this analysis or offers any substantial evidence to contradict the conclusion of the Draft EIR.

Response No. 12-7

The commenter requests that the project provide additional green space instead of paying the in-lieu fee required as mitigation in the Draft EIR. The commenter, however, does not provide any evidence that paying the in-lieu fee instead of providing actual green space would result in any significant impacts. To the contrary, the City has determined that the in-lieu fee will reduce impacts to less than significant levels. As discussed in Section II, Project Description, of the Draft EIR the proposed project would include both common and private open space and amenities totaling 65,000 square feet (1.49 acres). Shared open space recreational amenities totaling 3,000 square feet would be provided on the 2nd/base level and would include a 1,200-square-foot club room and a 1,800-square-foot fitness room. Shared open space non-recreational amenities would total 39,600 square feet and would include a 31,500-square-foot pool deck on the 2nd/base level. These amenities and pool deck would be available to residents only. Other non-recreational amenities include a 5,400-square-foot linear park located on Sycamore Avenue, a 1,600-square-foot garden located at the corner of 8th Street and Sycamore Avenue, and the 1,100-square-foot La Brea Court, located along La Brea Avenue, for a total of 8,100 square feet (0.19 acre) of public open space. Private decks totaling 22,400 square feet would also be provided.

As discussed in the Draft EIR in Section IV.J.4, Recreation and Parks, the project would introduce approximately 1,220 new residents and employ approximately 135 individuals. Also discussed therein, the desired long-range standard for both neighborhood and community park/recreation facilities is 2 acres (minimum) per 1,000 residents and, for regional parks, 6 acres per 1,000 residents. As such, project residents would require approximately 2.44 acres of neighborhood and community park/recreation facilities, and 7.32 acres of regional parkland. Project employees would require an additional 0.27 acre of

neighborhood and community park/recreation facilities, and 0.81 acre of regional parkland. In total the project would require 2.71 acres of neighborhood and community park/recreation facilities, and 8.13 acres of regional parkland.

As discussed above, the project would provide common and private open space and amenities totaling 65,000 square feet (1.49 acres) and a total of 8,100 square feet (0.19 acre) of public open space. As such, the project would not provide the required amount of open space to meet project demands.

As discussed on page IV.J.4-10, the recreation and open space amenities would also partially serve to meet the needs and demands of the new residents and serve to partially reduce demand for public recreation facilities potentially generated by the proposed project. However, due to the existing deficit of public parks and open space in the Wilshire Community Plan Area and City of Los Angeles, the project would still contribute additional demand for recreational and park facilities. As such, the project applicant would pay the in-lieu fee (based on current rates approximately \$3.8 million) to the City in accordance with the requirements of the City of Los Angeles (Ordinance No. 141422, amending Chapter 1, Article 7, of the Los Angeles Municipal Code). With payment of these fees, impacts related to parks and recreation would be reduced to a less than significant level.

Response No. 12-8

Please see **Responses No. 12-1** through **No. 12-7**. The comment expressing concern about the adequacy of the analysis and resolution of issues will be provided to the decision makers for their review and consideration prior to any approval action on the project.

EIR CASE NO: ENV- 2007-1604-EIR

PROJECT NAME: WILSHIRE AND LA BREA PROJECT

5200 - 5224 WILSHIRE BOULEVARD 700- 758 LA BREA AVENUE,
719 -757 S. SYCAMORE AVE, LOS ANGELES, CA 90036

TOPIC: SYCAMORE TRAFFIC CONTROL DUE TO NEW BUILDING

ATT:

Simal Hewawitharanna & Jimmy Liao (213 978 1343) FX

I am writing concerning the potential traffic issues that will no doubt arise with respect to the proposed WILSHIRE AND LA BREA PROJECT.

The traffic on 800 & 900 blocks of Sycamore Ave is already congested and Sycamore should be a one way street traveling North or a cul de sac at 8th & Sycamore.

From our understanding parking exits for the condos and retail spaces exit onto Sycamore Ave. We would like to stop the increased congestion that will surely happen if a diversion is not put into place prior to the building being completed.

1

Sincerely,

Matt Tenggren 835 S. Sycamore Ave
323-937-3575

Comment Letter No. 13

October 9, 2008

Matt Tenggren
835 S. Sycamore Avenue
Los Angeles, California 90036

Response No. 13-1

The commenter suggests that the project will result in significant traffic impacts on the 800 and 900 blocks of Sycamore Avenue because of the parking exits proposed on that street and requests that the street be changed into a one way street traveling north or that a cul-de-sac be implemented at 8th Street and Sycamore to reduce these impacts. However, the traffic study provided in Appendix IV.K of the Draft EIR and approved by the LADOT concludes that the project will not result in significant traffic impacts on Sycamore Avenue, Orange Avenue or Detroit Street. The commenter does not offer any evidence to challenge this conclusion. Furthermore, the commenter does not provide any evidence to support his suggestion that a one way street or cul-de-sac would improve traffic conditions on Sycamore Avenue.

The Draft EIR concludes that with the implementation of the proposed mitigation measures MM-TRA-1, MM-TRA-2, and MM-TRA-3 identified on page IV.K-37 of the Draft EIR and approved by LADOT, all significant project traffic impacts will be reduced to less than significant levels. Furthermore, the project traffic study analyzes potential neighborhood traffic impacts on local streets, including Sycamore Avenue. This analysis is summarized on pages 35 and 36 of the traffic study provided in Appendix IV.K of the Draft EIR and concludes that potential impacts to Sycamore Avenue would be less than significant due to an average daily trip (ADT) increase that would be below the threshold established in the City's CEQA guidelines. Therefore, additional traffic mitigation such as street closures or one-way street conversions is not warranted. Furthermore, the commenter's suggested conversion of Sycamore Avenue to one-way northbound street or creation of a cul-de-sac may exacerbate traffic conditions by causing secondary traffic impacts due to the diversion of traffic currently using Sycamore Avenue to other local neighborhood streets at this time. For these reasons, the suggested changes to Sycamore Avenue are not recommended for further consideration at this time. However, the Applicant will continue to work with LADOT to ensure that effective traffic reduction measures are implemented.

EIR CASE NO: ENV- 2007-1604-EIR

PROJECT NAME: WILSHIRE AND LA BREA PROJECT

5200 - 5224 WILSHIRE BOULEVARD 700- 758 LA BREA AVENUE,
719 -757 S. SYCAMORE AVE, LOS ANGELES, CA 90036

TOPIC: SYCAMORE TRAFFIC CONTROL DUE TO NEW BUILDING

ATT:

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1

From our understanding parking exits for the condos and retail spaces exit onto Sycamore Ave. We would like to stop the increased congestion that will surely happen if a diversion is not put into place prior to the building being completed.

Sincerely, ^{JONG H. HUFMAN 821 S SYCAMORE AVE LA 90036}
~~_____~~ WHENEVER LABREA, WHICH IS A MAIN STREET IS

OBSTRUCTED TRAFFIC FLOWS THRU SYCAMORE AND CREATED A TRAFFIC JAM. WITH THE INCREASE IN OCCUPANCY, IT WILL BECOME A NIGHTMARE. THE STREET IS ALREADY NOT WIDE ENOUGH FOR TWO CARS TO PASS GOING IN OPPOSITE DIRECTIONS. ALSO KEEP IN MIND THE ELEMENTARY SCHOOL LOCATED ON SYCAMORE AND OLYMPIA

2

Comment Letter No. 14

October 11, 2008

John G. Huffman
831 S. Sycamore Avenue
Los Angeles, California 90036

Response No. 14-1

Please see **Response No. 13-1** regarding potential traffic impacts to Sycamore Avenue and for a discussion about why the suggested changes to Sycamore Avenue are not recommended for further consideration at this time.

Response No. 14-2

The commenter correctly points out that Sycamore Avenue may not wide enough to sustain heavy traffic. Sycamore Avenue is designated a local street south of Wilshire Boulevard to 8th Street. A local street standard in commercial areas calls for a 60-foot right-of-way with a 40-foot-wide roadway and 10-foot sidewalks on each side. Sycamore Avenue is fully dedicated to 60 feet with a 30-foot roadway and 15-foot sidewalks on each side. Therefore, a 5-foot street widening along the Sycamore Avenue project frontage will be required to meet the local street standard, as has been determined to be necessary by the City of Los Angeles Bureau of Engineering. Also, please see **Response No. 13-1** above regarding local traffic on Sycamore Avenue.

From: Joan Jakubowski [joanjakubowski@sbcglobal.net]
Sent: Saturday, October 11, 2008 7:43 AM
To: Srimal.Hewawitharana@lacity.org; Jimmy.Liao@lacity.org
Subject: EIR Case No.: ENV-2007-1604-EIR - Wilshire and LaBrea Project

After reviewing the EIR for this project and attending meetings with the developer, there are many things that bother me about this development. Rather than listing all the reasons that I am against the project however, I would like to focus only on my three top priorities.

1

This development will basically double the size of the of the population in the Sycamore Square Area which runs from Citrus to La Brea and Highland to Olympic.

Number One - Our area can not handle more traffic and more cars to be parked. We currently do not have enough parking due to the many apartment buildings on Mansfield that do not provide parking for tenants. With rising rents more and more people currently sharing housing 855 residential parking spaces is just not enough for 562 units. I understand that this number might meet the City Code but the City Code does not reflect what is actually happening in today's world and does not work for this project. People already use 8th Street as a cut through in the morning to avoid Wilshire, Olympic and 9th Street due to the school that backs up on 9th and the traffic caused by the busses and cars bringing students to the campus. 8th Street will become a parking lot in the morning. Cars will simply not be able to enter/exit the proposed building.

2

Number Two - There is no current infrastructure survey on file with the City although there have been many projects built to the West of this project in the past several years. Until a current study is done, I would like to see this project halted. The EIR does not adequately address the potential problems with the infrastructure namely utilities, telephone, sewer.

4

Number Three - This goes along with the infrastructure but has to do with services. We just do not have services available to handle an influx of people. There is no green space, no park space - add that to our local library being small and a slow response rate from the LAPD and we are an area ripe for trouble.

5

Please reconsider the size and scope of this project. It is just too large in its current state for the neighborhood.

6

Joan Jakubowski
855 S. Citrus Avenue
Los Angeles, CA 90036
323-938-0812

10/15/2008

Comment Letter No. 15

October 11, 2008

Joan Jakubowski
855 S. Citrus Avenue
Los Angeles, California 90036

Response No. 15-1

Please see **Response No. 12-1**, above. As discussed there, the project would be consistent with the population projections made for the Wilshire Community Plan Area.

Response No. 15-2

Please see **Response No. 12-3** for a detailed discussion of parking needs for the project and the adequacy of the parking that will be provided.

Response No. 15-3

Please see **Response No. 13-1** regarding potential neighborhood traffic impacts to Sycamore Avenue. The commenter also suggests that traffic on Sycamore Avenue will prevent cars from exiting/entering the proposed project during the morning rush hour at that street. The commenter, however, offers no evidence to support her conclusion that the cars will not be able to enter/exit the project. Furthermore, the project's on-site circulation patterns, access, and loading locations are consistent with current LADOT policy and prior reviews for this site. LADOT required all access be from the adjacent minor streets with no vehicular access on Wilshire Boulevard and La Brea Avenue; streets with heavy traffic volume. Therefore, all site access is proposed from Sycamore Avenue and 8th Street with full internal connectivity within the parking garage to allow alternative access choices for residents and patrons of the project.

It is recommended by LADOT that 8th Street be widened along the north and south sides to improve project access and to accommodate the added traffic generated by the project and cumulative development. LADOT's project requirements are contained in the project approval letters dated September 10, 2007, and June 26, 2008, which are provided in Appendix IV.K of the Draft EIR.

Response No. 15-4

As stated in Section I, Summary, of the Draft EIR, the Draft EIR has been prepared in accordance with CEQA and the *State CEQA Guidelines*. CEQA does not require an analysis of telephone infrastructure, nor does the City of Los Angeles. A discussion of the proposed project's impacts and cumulative impacts related to utilities is contained in Section IV.L, Utilities, of the Draft EIR, which includes a discussion of impacts to water, wastewater (sewer), solid waste, and energy service systems. The analyses contained in the Draft EIR concluded that with the implementation of mitigation measures, potential impacts would

be reduced to less than significant levels. Because no specific questions related to the analysis or conclusions in the Draft EIR have been raised, no further response can be provided. Please see also **Response No. 5-1** for a detailed discussion on why the project will not result in significant impacts to the City's infrastructure.

Response No. 15-5

A discussion of the proposed project's impacts and cumulative impacts related to public services is contained in Section IV.J, Public Services, of the Draft EIR, which includes a discussion of impacts to police protection, fire protection and emergency medical services, public schools, recreation and parks, and libraries. The analyses contained in the Draft EIR concluded that with the implementation of mitigation measures, potential impacts Public Services would be reduced to less than significant levels. Because no specific questions related to the analysis or conclusions in the Draft EIR have been raised, no further response can be provided.

Response No. 15-6

Please see **Response No. 12-6** for a detailed discussion of why the size and scale of the project is compatible with the neighborhood. The comment will be provided to the decision makers for their review and consideration prior to any approval action on the project. As this comment is not directed at the environmental analysis or conclusions in the Draft EIR, no further response is required.

Sung and Nancy Park
5262 West 8th Street
Los Angeles, CA 90036

October 12, 2008

Jimmy Liao, City Planner/EIR Unit Head
Room 750, City Hall
Department of City Planning
200 North Spring Street
Los Angeles, CA 90012

RE: EIR Case File No. ENV-2007-1604-EIR
Wilshire and La Brea Project

Dear Mr. Liao:

This is in response to the Notice of Completion and Availability of Draft Environmental Impact Report dated August 28, 2008.

We are homeowners for the property (a duplex) located on the south-west corner of South Sycamore Avenue and West 8th Street. Our residence address is 5262 West 8th Street, which is situated directly across the street from the project location. We are concerned with several issues regarding the project's impact on our home and the surrounding neighborhood.

First, insufficient/no consideration has been given to the location of our property, which is the only residence located on the 5000 block of West 8th Street, directly south of the project. There are plans to allow for a 15 feet-wide setback along Sycamore Avenue. However, there does not appear to be a similar setback planned for West 8th Street. Along with the setback are plans for a linear park along Sycamore Avenue. The purpose of the setback and park is to provide for a transition between the height and mass of the proposed project and the residential buildings on the east side of Sycamore Avenue.

1

Granted, there is a garden planned at the corner of Sycamore and West 8th Street. However, this is not sufficient to provide a similar transition from the height of the proposed building to our property. There are also plans to widen West 8th Street. However, this will be done by reducing the width of the sidewalk along our property by 3.5 feet. The impact of the street widening should be limited to the project building, not to our property, and consideration should be given for an increased setback along West 8th Street.

Another concern is the impact of the two access points to the structure on West 8th Street. Two entrances are located directly across the street from our property and the entrance to our own driveway and garage. An exit for all unloaded trucks will also be located across from our property, which gives us reason to conclude that the impact of traffic patterns on our property has been completely disregarded. The additional traffic resulting from the cars entering and exiting this location will make it much more difficult for us to utilize our own driveway, as well as increase the amount of noise pollution from which we would suffer.

2

3

With the increase in traffic, we believe that there will inevitably be a higher frequency of accidents at the corner of West 8th Street and Sycamore Avenue. There is already a high rate of accidents at this intersection, as we personally witness the occasional collision and almost-daily near misses. In fact, a family vehicle was parked immediately south of this intersection and was hit by another vehicle about one month ago. The driver was going south on Sycamore, hit the parked car, and took off before being identified. While the family member was insured, total damages cost approximately \$12k.

4

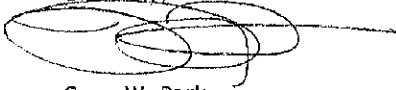
One proposal to reduce the traffic and number of accidents at this intersection is to convert Sycamore Avenue to a one-way street heading north. We are also requesting that the two access points and truck exit be relocated to minimize the impact to our home.

5

6

We thank you for your time and consideration in this matter.

Sincerely,



Sung W. Park

Comment Letter No. 16

October 12, 2008
Sung W. and Nancy Park
5262 West 8th Street
Los Angeles, California 90036

Response No. 16-1

The Commenter claims that no consideration is given in the Draft to EIR to the residential development located on the 5000 block of West 8th Street. This is incorrect. Draft EIR Figure IV.A-5 takes 8th Street into account for purposes of shade/shadow analysis. Page IVA-13 specifically references 8th Street, describes the existing development, and discusses the existing transition “between areas of high-density commercial development and low-scale residential.” Please see **Response No. 13-1** regarding potential neighborhood traffic impacts to Sycamore Avenue. Please see **Response No. 12-6** for a detailed discussion of why the size and scale of the project is compatible with the neighborhood.

The commenter requests a 15-foot setback on 8th Street, similar to that proposed for the east side of the project, due to the height and mass of the project. The commenter is referring to the 15-foot landscape buffer along Sycamore Avenue which is intended to enhance the transition between the project and an entire block of residences across the street. Unlike Sycamore Avenue, 8th Street is characterized by a mix of commercial and residential uses. Furthermore, the distance between the proposed project building along the 8th Street frontage and the residential buildings along 8th Street would be at least 64 feet, which is the required right-of-way width (including sidewalks) after street widening (see project Traffic Study, p. 39, Appendix IV.K of the Draft EIR); this distance does not include the side yard of the commenter’s property. There is not a significant land use compatibility impact regarding the project’s 8th Street frontage and its relationship to 8th Street multi-family residential uses. In fact, the front yard of the commenter’s property is oriented toward Sycamore Avenue. The side yard is bordered by 8th Street, and side yard setback requirements (generally 5 feet) are much less than front yard setback requirements (generally 20 feet) for R2-zoned properties such as the commenter’s. Therefore, there is no evidence to suggest that additional 15-foot setback on 8th Street is necessary. Furthermore, the Draft EIR concludes that the project will not result in any significant impacts with respect to Visual Resources or Land Use. As noted by the commenter, landscaped open space will be located at the corner of 8th Street and Sycamore Avenue, across the street from the commenter’s property, to help provide a buffer between the project and neighboring residences. Also, the C2 Zone and -1 Height District do not limit height, but the project will be seven stories tall along the 8th Street frontage, which is well within the typical height range for projects located on land designated as a Regional Center.

The commenter also requests that the proposed widening of 8th Street be confined to the north side of the street only. Widening 8th Street by 3.5 feet from La Brea Avenue to approximately 160 feet easterly (along the commercial frontage of 8th Street only is required to mitigate a potentially significant traffic trip impact at the intersection of 8th Street and La Brea Avenue. If only the north side of 8th Street were widened, then the traffic impact would remain significant. CEQA requires the implementation of feasible mitigation measures to reduce potential impacts below significant levels. The commenter offers no substantial evidence that street widening on the south side of the street would result in any significant environmental impacts. After widening, the sidewalk on the south side of 8th Street will be 12 feet wide adjacent to the commercial use. The 8th Street sidewalk/parkway along the residential frontage would remain 15 feet wide (see Appendix IV.Kb, Supplemental Traffic Assessment for Revised Project, of the Draft EIR, LADOT September 10, 2007 letter, attachment 5). There has never been a requirement or need for additional dedication on the south side of 8th Street between La Brea Avenue and Sycamore Avenue.

Response No. 16-2

See **Response No. 15-3** for a discussion of circulation on the project site and adjacent streets. The project has been designed to provide on-site loading and unloading facilities. The delivery trucks associated with the project will not be conducting loading or unloading activities on 8th Street and therefore will not be blocking any driveways on the south side of 8th Street between La Brea Avenue and Sycamore Avenue.

Response No. 16-3

As discussed in the Draft EIR in Section IV.H, Noise, on page IV.H-17, the proposed project would result in permanent ambient noise level increases ranging from 0.0 to 1.2 A-weighted decibels (dB(A)) on surrounding roadways during the weekday. As shown in Table IV.H-5, in the Draft EIR, the largest project related increase of 1.2 dB(A) would occur on Sycamore Avenue between Wilshire Boulevard and 8th Street. An increase of 0.4 dB(A) is projected to occur on 8th Street between La Brea Avenue and Sycamore Avenue. These road segments would have a CNEL that falls under the “normally acceptable” category, as identified in Table IV.H-4 of the Draft EIR. Based upon this analysis, operational impacts would be less than significant and no mitigation measures are required.

Response No. 16-4

The commenter suggests that frequency of accidents will increase at the corner of West 8th Street and Sycamore Avenue due to the project. However, the commenter offers no evidence to support this claim. Furthermore, project traffic mitigation along 8th Street consists of street widening to improve the traffic flow and driver sight lines at the intersection of 8th Street and Sycamore Avenue. Traffic mitigation is also required at the intersection of La Brea Avenue and 8th Street to reduce the project’s traffic impacts to a less than significant level. These project traffic mitigation measures will provide a benefit for all users of

III. Responses to Written Comments on the Draft EIR

8th Street by improving the traffic flow. This, in turn will improve traffic safety. These mitigation measures are provided on page IV.K-37 of the Draft EIR. Also, please see **Response 15-3** regarding LADOT review of the project for access and circulation.

Response No. 16-5

Please see **Response No. 13-1** for a discussion about why the suggested changes to Sycamore Avenue are not recommended for further consideration.

Response No. 16-6

See **Response No. 16-2** for a discussion regarding the lack of impact on the commenter's access.

EIR CASE NO: ENV- 2007-1604-EIR

PROJECT NAME: WILSHIRE AND LA BREA PROJECT

5200 - 5224 WILSHIRE BOULEVARD 700- 758 LA BREA AVENUE,
719 -757 S. SYCAMORE AVE, LOS ANGELES, CA 90036

TOPIC: SYCAMORE TRAFFIC CONTROL DUE TO NEW BUILDING

ATT:

Simal Hewawitharanna & Jimmy Liao (213 978 1343) FX


I am writing concerning the potential traffic issues that will no doubt arise with respect to the proposed WILSHIRE AND LA BREA PROJECT.

The traffic on 800 & 900 blocks of Sycamore Ave is already congested and Sycamore should be a one way street traveling North or a cul de sac at 8th & Sycamore.

From our understanding parking exits for the condos and retail spaces exit onto Sycamore Ave. We would like to stop the increased congestion that will surely happen if a diversion is not put into place prior to the building being completed.

1

Sincerely,


Jenna Pethe

Comment Letter No. 17

October 12, 2008

Jenna Petne

Response No. 17-1

Please see **Response No. 13-1** for a discussion about why the suggested changes to Sycamore Avenue are not recommended for further consideration.

EIR CASE NO: ENV-2007-1604-EIR

PROJECT NAME: WILSHIRE AND LA BREA PROJECT

5200 - 5224 WILSHIRE BOULEVARD 700- 758 LA BREA AVENUE,
719 -757 S. SYCAMORE AVE, LOS ANGELES, CA 90036

TOPIC: SYCAMORE TRAFFIC CONTROL DUE TO NEW BUILDING

ATT:

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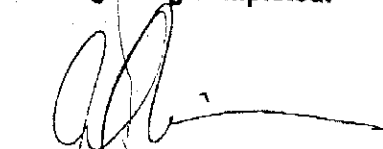
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From our understanding parking exits for the condos and retail spaces exit onto Sycamore Ave. We would like to stop the increased

congestion that will surely happen if a diversion is not put into place prior to the building being completed.

1

Sincerely,


→ RUBEN
(213) 965 1925

10/12/2008

Comment Letter No. 18

October 12, 2008

Ed Rubrico

Response No. 18-1

Please see **Response No. 13-1** for a discussion about why the suggested changes to Sycamore Avenue are not recommended for further consideration.

From: Susan Baker [susanjbaker@earthlink.net]
Sent: Monday, October 13, 2008 7:09 AM
To: Srimal.Hewawitharana@lacity.org
Cc: mten@earthlink.net; Fuller Elizabeth
Subject: ENV-2007-1604-EIR

I am writing to protest the proposed Wilshire and LaBrea Project, referred to as W/LB in my letter.

1

Sycamore Square is a very pleasant, quiet, low density neighborhood of mostly cottage-style homes and Spanish-style duplexes or four-plexes. W/LB proposes by its one project in one small corner of our neighborhood to nearly double the number of residents. But will they stop there if they complete the W/LB project? What is to prevent them from doing this repeatedly all the way from LaBrea to Highland and beyond? Their only motive is profit: they don't have to put up with the consequences. We who already live here will get nothing but added traffic, noise pollution and likely digital billboard blight.

2

After the noise, dust pollution and increased traffic during a three-year construction period this is what we will have to look forward to:

3

The added traffic will be of a 24-hour nature: proposed residents will have visitors, parties, UPS and pizza deliveries. Proposed retail tenants will have customers, employees, UPS deliveries and trash hauling and franchise chains will have semi trucks delivering provisions between midnight and 5 a.m. It is expected that increasing the number of residents and retail vendors will produce more auto accidents as well as personal/retail robberies and burglaries, which will require costly police action and its attendant noise of sirens and helicopters. In addition, it is expected that some new retail vendors will request liquor licenses: the three blocks of LaBrea from Wilshire to Olympic already have EIGHT wine/beer or liquor licenses as well as a dance hall. How much more liquor are we expected to absorb?

4

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6

It's probable that W/LaB will have insufficient parking for retail and maintenance employees, believing that it will force people to take public transportation. It won't. Employees will be shuffling their cars every two hours to avoid tickets. Imagine what it will be like during the winter holiday season with all the added traffic. LaBrea becomes very impacted during rush hours, and is dreadful during Oscar season because Hollywood Boulevard gets shut down for more than a week.

7

8

Now add in Wilshire Crest elementary school at Sycamore and Olympic, and the many parents who walk their children to and from school, as well as the big yellow school buses that will be competing for driving space with all the W/LB employees who will be coming to work at about the same time.

9

This entire area is becoming overbuilt with brand-new apartments. Who \$ay\$ we have to have \$till more? And who the heck is going to live there? I don't know anybody who sleeps in their car because they can't find an apartment. New apartments do *not* cause rents to fall on existing units.

I would like to point out that Mayor Villaraigosa, for whom I enthusiastically voted, did not start talking about the Manhattan-ization of Los Angeles until AFTER he was elected. Not a peep did he

10

10/15/2008

say before the election about this distorted vision of his. Why do we have to turn nice, relatively quiet, very pleasant Los Angeles into Manhattan? Please understand that if I wanted to live in Manhattan, I would already be there! Please don't thrust some other city's lousy lifestyle and cramped conditions on us.

10

Many thanks!

Susan J. Baker
825 S. Sycamore Avenue
Los Angeles, CA 90036

10/15/2008

Comment Letter No. 19

October 13, 2008

Susan J. Baker
825 S. Sycamore Avenue
Los Angeles, California 90036

Response No. 19-1

Please see **Response No. 12-1**, above. As discussed there, the project would be consistent with the projections made for the Wilshire Community Plan Area.

Response No. 19-2

The commenter offers no substantial evidence that the project will result in significant impacts in terms of traffic, noise, or billboard blight. Traffic impacts were discussed in Section IV.K, Transportation, of the Draft EIR. Noise impacts were discussed in Section IV.H, Noise, of the Draft EIR. Aesthetic impacts, including light and glare, were discussed in Section IV.A, Visual Resources, of the Draft EIR. All environmental sections of the Draft EIR contained a cumulative impact analysis. The analysis in the Draft EIR concluded that operational project and cumulative impacts in all topic areas would be less than significant, or reduced to less than significant levels with implementation of mitigation measures. The project applicant does not currently own any other site on Wilshire Boulevard from La Brea Avenue east to Highland Avenue and beyond for the purposes of redevelopment and therefore cannot comment on the development of any other site. Other projects proposed for development will be subject to review and approval by the City of Los Angeles. Also, the project would not include any new billboards, and the two billboards currently located on the project site would be removed.

Response No. 19-3

The commenter does not raise any specific issues regarding construction impacts. However, the EIR analyzed impacts related to air quality, noise, and traffic during construction in sections IV.B, Air Quality, IV.H, Noise, and IV.K, Transportation. The Draft EIR concluded that even with the implementation of all feasible mitigation measures to reduce impacts to the extent possible, air quality and noise impacts during construction would be temporary but nonetheless significant and unavoidable. The Mitigation Monitoring Program (MMP) in **Section IV** of this Final EIR is designed to monitor implementation of the mitigation measures required for the Wilshire and La Brea Project. The MMP will be in place throughout all phases of the project. City Planning, in conjunction with the project applicant, will assure that project construction occurs in accordance with the MMP. The South Coast Air Quality Management District (SCAQMD) shall be responsible for the implementation of corrective actions relative to violations of SCAQMD rules associated with mitigation. With compliance with City

regulations related to construction hours and implementation of the MMP, the air quality and noise impacts related to construction will be reduced to the fullest extent possible. Mitigation measures **MM-TRA-4** to **MM-TRA-7** will further reduce potential impacts due to construction traffic. Please refer to Section I, Summary, and **Section IV** of this Final EIR for these mitigation measures.

Response No. 19-4

The commenter asserts that traffic related to operation of the project will occur 24 hours per day. With regard to activities of residents and residents' guests, activities of the residents are anticipated to be similar those of residents currently living in the immediate project vicinity and are not expected to be 24 hours in nature. During off-peak retail hours, guests of residents would be allowed to use the retail and commercial parking spaces. The hours of operation of retail uses would conform to City code and would be generally be between 7:00 AM and 12:00 AM (midnight). Loading docks would be located completely within the interior of the parking structure. Trucks would enter on the north from the driveway on Sycamore Avenue and exit via the south driveway onto 8th Street. Delivery will be limited to the hours of between 7:00 AM to 10:00 PM, per Municipal Code Section 114.03j(a).

Please refer to Section IV.K, Transportation, of the Draft EIR. The traffic impact study prepared for the project's environmental review and summarized in Section IV.K includes an estimate of the daily traffic generated by the project. The study also includes a neighborhood traffic impact analysis based on the added daily traffic generated by the project (page 35 of traffic impact study provided in Appendix IV.K of the Draft EIR). Using the LADOT policies and procedures for neighborhood traffic impacts, it was determined that the project's daily traffic generation would not cause any significant neighborhood traffic impacts.

Response No. 19-5

The commenter provides no evidence that the Project will result in increased traffic accidents and crime. However, as discussed in **Response No. 15-3**, traffic safety will improve as a result of mitigation measures, including street widening, which will enhance driver line of sight in the area. Also, as discussed in Section IV.J.1, Police Protection, of the Draft EIR, the project would be designed to provide security features that insure a secure environment for project residents and employees. Secured entry and exit points for residents, security fencing, security lighting, and other essential features would be provided at the project site. Additionally, as recommended in mitigation measure MM-PP-1, prior to the issuance of building permits, the applicant would coordinate with the LAPD's Crime Prevention Unit (CPU) to incorporate necessary security measures for the purpose of incorporating "defensible space" and other crime prevention features into the project. Additionally, in order to help the Wilshire Area

commanding officers during responses to emergencies, the applicant would provide a diagram demonstrating access routes to each portion of the project site.

As discussed in Section IV.J.1, Police Protection, funding for the police department in the City of Los Angeles is derived from various types of tax revenue (e.g., property taxes, sales taxes, user taxes, vehicle license fees, deed transfer fees, etc.), which are deposited in the City's General Fund. The City Council then allocates the revenue for various public services that the City provides, including police protection services. As the Wilshire and La Brea Project is developed, tax revenues from property and sales taxes would be generated and deposited in the City's General Fund and the State Treasury. A portion of these revenues would then be allocated to the City's police department during the City's annual budget process to maintain staffing levels within the City of Los Angeles in numbers adequate to serve project-related increases in service call demands.

Response No. 19-6

The commenter is concerned about the concentration of alcohol-serving establishments in the project area and the possible impact on crime by adding establishments that serve liquor to the project site. The commenter, however, does not address the adequacy of the EIR in analyzing these issues. As described in the project's entitlement application, 12 establishments selling or dispensing alcoholic beverages for on-site consumption are located within a 1000-foot radius of the project site. Of these, one is located on site and will be removed with the demolition of the existing uses. Three premises are located within 100 to 160 feet, two of which sell beer and wine only. The remaining eight establishments are located 500 to 1000 feet from the subject property and include seven restaurants. With respect to off-sale establishments, four are located within 1000 feet of the subject site. Of these, one is on site and will be removed with the demolition of existing uses. Two others are food markets located 700 or more feet from the subject site and selling only beer and wine. The fourth establishment is an online retailer offering no on-site purchases, and sells only beer and wine.

With respect to the applicant's request for authorization to sell/dispense alcoholic beverages for on-site consumption in conjunction with three restaurants, the statistics from the Department of Alcoholic Beverage Control state there is an over-concentration of licenses. However, the number of licenses does not rise to the level of being an undue concentration. This is a condition which similarly exists in many intensely urbanized areas of the City of Los Angeles, and particularly in areas such as Downtown Los Angeles, Westwood, and the Miracle Mile. Due to both residential population densities in the vicinity and because such areas are also tourist and recreation destinations, there tends to be a high concentration of bonafide eating establishments, many of which typically also sell/dispense alcoholic beverages as an important adjunct to the economic viability of their businesses.

With respect to the applicant's request for authorization to sell alcoholic beverages for off-site consumption in conjunction with a gourmet specialty foods and beverages store, while there exists a minor concentration of licenses (three permitted, four existing), it again does not rise to the level of being undue. As noted above, after construction of the project, there will exist only three off-sale licenses within 1000 feet of the property. As with the restaurants, this is a condition which exists in many highly urbanized portions of the City. The existence of a slight overconcentration of off-sale licenses in areas such as the project area is not automatically inappropriate and does not necessarily constitute an undue concentration. This is substantially because in this case, the applicant is requesting the authorization to sell alcoholic beverages in conjunction with a specialty market operation. Such goods are anticipated to be imported and domestic gourmet items, not typically sold in more conventional liquor outlets, and will appeal to upscale residents of the project.

With respect to crime statistics, information from the Department of Alcoholic Beverage Control demonstrates that the project site is not located within a high crime area. Furthermore, as noted in the Draft EIR on page IV.J.1-1, the average police response time for the project area is slightly faster than the Citywide average. It is not anticipated that the character of the proposed uses would exacerbate existing levels of crime or be a magnet for criminal activity. These uses will be located within an upscale development, and will be composed of bonafide eating places offering full dining menus, and a specialized gourmet food and beverage shop. The property owner will insure that individual operators of the facilities provide appropriate security measures when application is made for the specific premises under future plan approval filings. Under those applications, a variety of premises-specific characteristics can be determined, including hours of operation, occupancy loads, entertainment, the precise type of alcoholic beverages permitted, the location of cocktail lounges and security measures. The project owner will fully comply with the rules and regulations established by the City of Los Angeles for establishments that serve liquor. This comment will be provided to the decision makers for their review and consideration prior to any approval action on the project. As this comment is not directed at the environmental analysis or conclusions in the Draft EIR, no further response is required.

Response No. 19-7

See **Response No. 12-3** for a detailed discussion of parking needs for the project and the adequacy of the parking that will be provided.

Response No. 19-8

LADOT provides a safe route to school map for the Wilshire Crest Elementary school. All suggested walking routes to the school provide for safe street crossings controlled by traffic signals or stop signs to protect the movements of pedestrians along these routes to school. Also see **Response No. 19-4**.

Response No. 19-9

The commenter expresses the opinion that new apartments are not needed.

The need for housing in this area was evaluated in the context of the Wilshire Community Plan Land Use Goals and Objectives in Section IV.G, Land Use, of the Draft EIR. As stated on page IV.G-12, Residential Objective 1-1 is the development of new housing to meet the diverse economic and physical needs of the existing residents and expected new residents in the Wilshire Community Plan Area to the year 2010. The project is consistent with this objective.

The impact of adding housing was analyzed in the Draft EIR in Section IV.I, Population and Housing. As stated on page IV.I-5, the implementation of the proposed project would result in the construction of 562 apartment units in the Wilshire Community Plan Area of Los Angeles. The provision of these 562 apartment units represents a 0.91 percent contribution towards the Southern California Association of Government's projected dwelling unit increase of 61,739 units within the City of Los Angeles between 2005 and 2010. As such, the additional housing that would be provided by the project is accounted for within growth projections for the City of Los Angeles and the Wilshire Community Plan Area, and implementation of the proposed project would not result in significant impacts.

Response No. 19-10

The comment will be provided to the decision makers for their review and consideration prior to any approval action on the project. As this comment is not directed at the environmental analysis or conclusions in the Draft EIR, no further response is required.

Felicia Filer
750 South Sycamore Avenue
Los Angeles, Ca 90036

October 13, 2008

**Subject: EIR Case No. ENV-2007-1604-EIR
Wilshire and La Brea Project encompassing
5200-5224 Wilshire Boulevard
700-758 La Brea Avenue, and
719-757 So. Sycamore Ave
Los Angeles, Ca 90036**

**Topic: SYCAMORE TRAFFIC CONTROL DUE TO NEW BUILDING; AND,
SYCAMORE DAYLIGHT REDUCTION DUE TO NEW BUILDING**

Attention: Simal Hewawitharanna & Jimmy Liao Fax 213-478-1343

I am writing concerning the potential traffic issues that will arise as a result of the proposed Wilshire and La Brea Development Project. The traffic on 700, 800 and 900 blocks of Sycamore Avenue is already congested. From our understanding parking exists for the condos and retail spaces will exit onto Sycamore. We would like to stop increased congestion that will surely happen if a diversion is not put into place prior to the building being completed. To that end, I support Sycamore becoming a one way-street traveling North or a cul-de-sac at 8th and Sycamore as an acceptable mitigation to the potential traffic problems this new development will create. I do not support widening Sycamore Avenue or 8th Street to accommodate the new development.

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Additionally, I am writing concerning the height of the proposed development and the negative effect of reduced daylight that will arise as a result. Sycamore residents on the 700 block currently have access to sunlight from sunrise to sunset. The proposed height of the new building will significantly reduce our access to daylight from roughly 2pm to sunset. It is my understanding that if a new development reduces the amount of sunlight to existing residents by up to three hours, the development is too tall and should be reduced. Therefore, I would like to request that four (4) separate shade studies be undertaken, in the Fall, Winter, Spring and Summer, to document the daylight conditions in each season. I also support the height of the building being reduced by one to two floors.

3

Respectfully,

Felicia Filer

Comment Letter No. 20

October 13, 2008

Felicia Filer
750 S. Sycamore Avenue
Los Angeles, California 90036

Response No. 20-1

See **Response No. 15-3** for a discussion of circulation on the project site and adjacent streets.

Response No. 20-2

Please see **Response No. 13-1** for a discussion about why the suggested changes to Sycamore Avenue are not recommended for further consideration.

Response No. 20-3

Figure IV.A-5, Shade and Shadow Analysis, of the Draft EIR, shows the shadows that would be cast by the project in the vicinity of the project site. As discussed on page IV.A-18 of the Draft EIR, morning shadow patterns would extend to the west and northwest of the project. The maximum shadow lengths would occur at the winter solstice. On that day, the project would cast shadows of approximately 440 feet. Early morning shadows would fall across properties on the northwest side in both the winter and autumn. Noon shadows would be cast on properties to the north in both the winter and autumn. Afternoon shadows cast by the project would extend to the northeast in the winter and autumn. During summer months, the sun travels in an arc farther north than during other times of the year. As such, shadows cast during the summer do not extend as far onto other adjacent properties as would occur during the winter. For this reason, no shadows would be cast upon residences along Sycamore Avenue. The Draft EIR concluded that no significant impact from shading would occur because the shadows cast from the proposed structure would not be cast upon shadow-sensitive uses to the east.

The commenter's request that the building height be reduced by one to two stories will be provided to the decision makers for their review and consideration prior to any approval action on the project. As this comment is not directed at the environmental analysis or conclusions in the Draft EIR, no further response is required.

From: Elizabeth Fuller [ZiIF@leapinliz.com]
Sent: Monday, October 13, 2008 4:06 PM
To: Srimal.Hewawitharana@lacity.org; jimmy.liao@lacity.org
Subject: Comments on Wilshire/La Brea Draft EIR - Case #ENV-2007-1604-EIR

To Whom it May Concern:

I have a number of a number of comments to offer on specific sections of the Draft EIR. But I must preface those comments with a couple of overall concerns:

First, I am becoming increasingly dismayed with a planning process in the City of Los Angeles that assumes zoning changes and variances to be standard procedure for every almost every commercial development project. Instead of developers working to pre-established codes for any given area, it has become standard procedure for each individual project to open up a revision process, at the developer's request, which effectively renders the existing code worthless and makes a mockery of its intent.

1

This disregard for zoning also has enormous cumulative impacts on our overall urban environment, far beyond anything within the scope of any single EIR.

Second, any Environmental Impact Report for a project of this size (which so completely transforms and, for lack of a better term, "densifies" its space) that concludes every single section with a finding of "no impact," "no cumulative impacts," or "no impact after mitigation," as this one does, is both unrealistic and hard to take seriously.

2

Now, for a few specifics:

City Actions Requested -- The original list of specific zoning changes and variances requested was more than a page long. The sheer number of requests is striking (see my first overall comment, above). I am particularly concerned about changing the current [Q]C2-1 lots along Sycamore to [T][Q]C4-2. These lots originally contained duplexes similar to the ones that still exist along the east side of Sycamore between Wilshire and 8th St. When those homes were taken and converted to parking for the adjacent businesses fronting on La Brea, the zoning was still specifically held (through the [Q] condition) to R-2 density levels, or surface level parking, to preserve the overall density and character of the neighborhood. The overall neighborhood has not changed since then, but converting the Sycamore lots would result in a huge character change for the surrounding residential area.

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Parking -- The proposed project would include 1,083 parking spaces for 562 residential units (1,220 residents) and 45,000 square feet of retail space. According to the Draft EIR, this number does meet city codes...but it still seems inadequate in the real world. 1,220 residents, plus commercial customers, plus residential visitors could easily overwhelm the planned parking, forcing the overflow to neighborhood streets, which are already struggling with limited parking and sparse enforcement of posted parking restrictions.

4

Traffic -- The Wilshire/La Brea intersection is already slow and tight, especially during peak traffic periods. The developers plan to widen La Brea, Sycamore and 8th, and to improve the signal system at Wilshire and La Brea. But these measures seem inadequate to the real-world picture of more than 1,000 people traveling in and out of the complex every day. Also, one particularly neglected element in this scenario is Sycamore Ave. Currently, Sycamore is a residential street, lined with duplexes, four-plexes and a few small apartment buildings. There is also an elementary school just two blocks south, at the corner of Sycamore and Olympic. The new development will put one of its two major entrance/exit points for vehicles on Sycamore Avenue. To assume that all the traffic to and from this access point will come from Wilshire Boulevard is definitely not realistic. Those of us who live here know that many people - including current residents - use Sycamore to access the neighborhood from both north and south and avoid the heavy traffic on La Brea. Going south to Olympic Blvd. (a major east/west artery) or making turns to go north from Olympic Blvd., is actually much easier at the uncontrolled Sycamore intersection than it is at La Brea. Residents of the new development will quickly discover this, too, and Sycamore will be burdened with a lot more traffic than it currently carries. No provisions for this are made in the current plans, and this is not addressed in the EIR. One potential mitigation would be a cul de sac on Sycamore, just south of Wilshire, which would allow traffic from Wilshire to access the development but not travel any further south on Sycamore. But this is not discussed in the current plans, some sort of control measures (speed bumps, etc.) need to be added to the dialogue. In addition, traffic and pedestrian safety already is a big concern at Wilshire Crest Elementary School...and would become an even bigger issue with the added traffic the development would bring to Sycamore Ave. Currently, the school has no crossing guards at any of its corners, which are already difficult for children and other pedestrians to navigate, especially during peak periods when both commuter and school traffic are at their heaviest. Closer study of neighborhood traffic patterns are definitely needed, as is greater consideration for school safety.

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Visual Resources -- The Draft EIR concludes that because there are no "significant" visual resources on the current site (now home to a large parking lot, the old Columbia Savings building and the MetroPlaza mini-mall), there would be no adverse visual impacts from the removal of the existing structures and construction of the new one. What the report fails to consider, however, is that the project would transform a very low-density block into a six-story tall, very massive structure. This creates a significant loss of a sense of space and openness, which has huge visual impact. Whether the current structures are worth saving is a separate issue (see below), but claiming that replacing low density, fairly open space with massive structures has no visual impact to the surrounding area simply isn't true.

7

Cultural Resources -- The Draft EIR contains lengthy architectural surveys of the buildings that currently occupy the block. The Columbia Savings section is particularly interesting. It describes many distinctive details of the building, including its unique atrium and stained glass skylight. But after clearly pointing out several architecturally significant features, the report then contradicts itself and concludes the building has "no distinct aesthetically valuable features." Another consideration is the development's proximity to the Miracle Mile Historic District, which extends west from La Brea Ave. The Draft EIR concludes that: "No direct impacts to the nearby Miracle Mile Historic District would occur due to its distance from the project site." In fact, city planners decided this question several years ago, when they ruled that structures on this block are close enough to affect the Miracle Mile District, and thus included it in the Miracle Mile CDO. It seems odd to claim that this site has no connection to or responsibility toward the Miracle Mile District when it is, in fact, included in the Design Overlay zone created to protect that very district. Finally, there is the issue of the development's proximity to and potential compatibility with the surrounding Sycamore Square neighborhood, which is made up of mostly 1920s single-family homes, duplexes and small apartment buildings. This neighborhood is eligible for HPOZ consideration, but the Draft EIR concludes that the new - very modern - development "would not alter the immediate surroundings of adjacent historical resources such that significant impacts would occur." The justification for this conclusion is that "a 15-foot-wide landscaped area" would "separate all historical resources from the new building." Again, this is simply not a real-world conclusion. One line (even a double line) of sidewalk trees does almost nothing to hide or even visually separate a low-density historical neighborhood from a six-story, full-block, very modern commercial complex.

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Population and Housing -- Our Sycamore Square neighborhood (Wilshire to Olympic, La Brea to Citrus) has approximately 1,200 residents. This development would double that population within one square block of the neighborhood. According to the EIR, this number of residents, and residential units, can easily be absorbed by the overall Wilshire Community Plan area, and thus "would not have a significant impact on population growth." If we were talking about adding 1,200 residents to the overall Wilshire Plan area, and there were no other developments happening in the region, that would certainly be true. We, however, talking about adding 1,200 residents to a single block in a single low-density neighborhood and immediately doubling its population. To say this will have no significant impact is, again, simply unrealistic. Also, the Draft EIR notes that there are 37 other developments underway in the surrounding area. Specific information about the overall planned increase in population is not given, but it seems impossible to conclude that 37 developments will not have any cumulative impacts, and that this development will not be part of that cumulative picture.

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Parks and Recreation -- According to the Draft EIR, the proposed development will contain "indoor club and fitness rooms, an outdoor pool and spa and open space for decks." But it also admits "the public open space and private recreation facilities included in the project design would not...meet the needs of the residents of the project for neighborhood or community parks." It also notes that our already few and far between parks (the nearest small playground is about eight blocks away) will be taxed by this influx of population. The mitigation measures proposed are payment of fees (presumably "Quimby Funds") to the city for park development or to developing "public park or recreation land on the project site." However, since they already stated that park space is not part of the development plan, this seems to be a contradiction, not a realistic expectation. A large complex containing a significant number of two-bedroom units will definitely be home to children who need playgrounds...and to a great many active young adults who need outdoor recreation space. The current plans do nothing to provide that space, and the project will definitely bring more traffic to our existing parks, which simply aren't adequate for the current population, much less another 1,200 people.

12

Transportation -- Given the proposed parking plans (1,083 spaces for 1,220 residents plus visitors and business customers), one would have to assume that both the City and the developers are hoping many residents will take advantage of living at the intersection of two busy thoroughfares and take public transportation instead of driving. Unfortunately, this, too, is fairly unrealistic given current public transportation service. Metro Rapid buses along Wilshire are already standing room only for most of the day, and a Purple Line subway is probably at least 20 years in the future. Current rapid transit is not up to absorbing a great number of new riders at this location, and if people do make the attempt, and find service crowded to the point of unavailability, they'll quickly look elsewhere - probably back to their cars - for most daily excursions.

13

Alternatives Considered But Rejected -- The developers state in the Draft EIR that several alternative projects were considered, including a no-build option, a commercial-only development that would not require any zoning changes (but would put a tall office tower along Wilshire Blvd.), a lower-density mixed-use development that would still be large enough to require the same list of zoning changes, and a project identical to the one proposed, but with no subterranean parking. It seems odd, however, that the option that seems most logical was not considered: a much lower-density mixed use or

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commercial development along Wilshire and/or La Brea (which might even preserve at least one or two of the existing structures), with R2-density housing along Sycamore. This would require far fewer zoning changes, and would provide an end result much more in keeping with the overall density, history and character of the surrounding neighborhood.

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Finally, I will conclude by saying I am definitely not categorically opposed to development on this block. I do, however, have serious concerns about all of the above issues, which directly affect the quality of life in a neighborhood I have called home for 17 years. The developers will need to more carefully consider all of these issues - and not just the size of building the block will hold - if they hope to gain widespread support for the project and become the good neighbor they have repeatedly told us they would like to be.

15

Sincerely,

Elizabeth Fuller
903 S. Sycamore Ave.
Los Angeles, CA 90036
(323) 939-6193
zilf@leapinliz.com

Comment Letter No. 21

October 13, 2008

Elizabeth Fuller
903 S. Sycamore Avenue
Los Angeles, California 90036

Response No. 21-1

The commenter raises concerns with the planning process in the City of Los Angeles and suggests that this process may be resulting in cumulative environmental impacts. The commenter, however, does not raise specific environmental issues that pertain to this Draft EIR. In addition, the commenter does not provide any substantial evidence that the City's planning process will result in any significant cumulative environmental impacts. The comment raises an issue of public policy, i.e., whether the City should allow development projects that require zone changes. This policy issue will be forwarded to the decision maker for consideration.

Response No. 21-2

The project and its cumulative contribution of impacts related to other projects in the area were evaluated for each topical area of the Draft EIR. Significance is determined by the application of significance thresholds. The Draft EIR sets forth significance thresholds for each of the potential impact areas and includes analysis regarding whether the project impacts and cumulative impacts result in significant impacts compared to these thresholds. The commenter has not addressed the adequacy or propriety of significance thresholds and has offered no evidence that any perceived increase in demand for municipal services and traffic congestion results in a significant impact compared to these established thresholds.

While the majority of project-related and cumulative construction and operational impacts would be reduced to less than significant levels, the Draft EIR concluded that even with the implementation of all feasible mitigation measures to reduce impacts to the extent possible, air quality and noise impacts during construction would be significant and unavoidable.

Response No. 21-3

The commenter suggests that the lots along Sycamore Avenue should be developed to R-2 density levels in order to preserve the overall character of the neighborhood and implies that the project will result in a significant impact to neighborhood character. Section IV.A, Visual Resources, of the Draft EIR sets forth seven factors to be considered in determining whether the project would have a significant impact with respect to visual character analyzes these factors with respect to the project and the cumulative development in the surrounding area. Section IV.G, Land Use, of the Draft EIR and Tables IV.G-1 through IV.G-5 specifically addresses the project's impacts to visual character and its consistency with

applicable local and regional land use plans. The Draft EIR concludes that no project-specific or cumulatively significant visual character or land use impacts will result. The commenter does not identify any defects in this analysis and offers no substantial evidence to contradict the conclusion of the Draft EIR. The townhomes along Sycamore will be constructed at a maximum height of 44 feet, which is substantially lower than the 100-foot height of the majority of the project and the maximum project height of 130 feet. Furthermore, a 15-foot landscaped buffer will be provided along Sycamore Avenue as a transition to the existing residences across the street. This transition, along with the proposed landscaped open space buffer at the southwest corner of Sycamore Avenue and 8th Street, will enhance the project's compatibility with the neighborhood. As discussed in the Draft EIR, Section IV.A, the project will not result in any significant impacts in terms of visual character. Therefore, development of the project and specifically the lots along Sycamore Avenue will not be detrimental to the surrounding area.

Response No. 21-4

Please see **Response No. 12-3** for a detailed discussion of parking needs for the project and the adequacy of the parking that will be provided. The commenter correctly notes that the proposed number of parking spaces would meet the applicable Los Angeles Municipal Code parking requirements, and no significant impact will occur.

The proposed project requires a total of 1,083 parking spaces, including approximately 148 retail spaces, 80 restaurant spaces, and 855 residential spaces. A summary of the project's parking requirements described above as compared to its proposed parking supply is provided in Table IV.K-9, Code Parking Ratios and Required Spaces, on page IV.K-36 of the Draft EIR. Table IV.K-9 shows that the proposed project parking supply would be consistent with the City's parking requirement. Further, during off-peak retail hours, guests of residents would be allowed to use the retail and commercial parking spaces. For these reasons, parking for the proposed project is considered adequate, and no significant impact will occur. The project will also add 14 spaces on the west side of Sycamore, where parking is currently prohibited.

Response No. 21-5

Please see **Response No. 7-3** for a discussion of the methodology used to evaluate traffic impacts, **Response No. 13-1** for a discussion about why the suggested changes to Sycamore Avenue are not recommended for further consideration, and **Response No. 15-3** for a discussion of circulation on the project site and adjacent streets.

Furthermore, a capacity analysis of the existing baseline and future traffic conditions was completed at those locations in the study area expected to have the highest potential for significant project traffic impacts. Morning and afternoon peak hour conditions have been evaluated at sixteen intersections

selected by LADOT for review. Consistent with standard LADOT policy, certain low volume intersections or intersections with minimal project traffic need not be included specifically in a traffic study. Other higher volume intersections are better indicators of potentially significant traffic impacts than low volume intersections with more capacity which are much less likely to be significantly impacted per LADOT sliding scale of significance. The study area was selected in consultation with LADOT based on the traffic generation of the project, the project distribution, the street network, and the traffic impact thresholds used by the City of Los Angeles. Lastly, the neighborhood traffic impact analysis for the project did not warrant the installation of speed humps or any other neighborhood traffic control measures because no significant impacts on neighborhood streets, including Sycamore Avenue, Orange Avenue and Detroit Street, were found. Please refer to pages 35 and 36 of the traffic study provided in Appendix IV.K of the Draft EIR for the neighborhood traffic analysis. The Draft EIR has been revised to include the analysis provided in the traffic study. Please refer to **Section II, Corrections and Additions**, of this Final EIR for the additional text.

Response No. 21-6

As stated in **Response No 19-8**, LADOT provides a safe route to school map for the Wilshire Crest Elementary school. All suggested walking routes to the school provide for safe street crossings controlled by traffic signals or stop signs to protect the movements of pedestrians along these routes to school. The Draft EIR recognized the potential for safety impacts at the school during the construction phase of the project and recommends implementation of MM-SCH-11 to reduce this impact to a less than significant level. MM-SCH-11 requires that the project applicant provide crossing guards when safety of students may be compromised by construction-related activities at impacted school crossings. This mitigation measure was requested by the Los Angeles Unified School District in written correspondence provided in Appendix IV.J.3 of the Draft EIR. Additional mitigation measures requested by the LAUSD were incorporated in the Draft EIR.

Response No. 21-7

Section IV.A, Visual Resources, of the Draft EIR sets forth seven factors to be considered in determining whether the project would have a significant impact with respect to visual character analyzes these factors with respect to project and the cumulative development in the surrounding area. Section IV.G, Land Use, of the Draft EIR and Tables IV.G-1 through IV.G-5 specifically addresses the project's impacts to neighborhood character and its consistency with applicable local and regional land use plans. The Draft EIR concludes that no project-specific or cumulatively significant visual character or land use impacts will result. The commenter does not identify any defects in this analysis and offers no substantial evidence to contradict the conclusion of the Draft EIR.

The townhomes along Sycamore will be constructed at a maximum height of 44 feet, which is substantially lower than the 100-foot height of the majority of the project and the maximum project height of 130 feet. Furthermore, a 15-foot landscaped buffer will be provided along Sycamore Avenue as a transition to the existing residences across the street. This transition, along with the proposed garden at the southwest corner of Sycamore Avenue and 8th Street, will enhance the project's compatibility with the neighborhood. The courtyards would open to the east to take advantage of City skyline views and to provide a more articulated building face to the adjacent residential neighborhood on Sycamore Avenue. The secondary "bar" building would be used, together with the flats at grade, to diminish the height of the structure as it fronts Sycamore Avenue, and would provide mass, bulk, and scale that is more consistent with the residential structures located at the east side of the street. Additionally, the project would have building setbacks of 60 feet along Sycamore Avenue with a 5,400-square-foot linear park between Sycamore Avenue and the proposed buildings. As discussed in the Draft EIR, Section IV.A, the project will not result in any significant impacts in terms of visual character. Therefore, development of the project and specifically the lots along Sycamore Avenue will not be detrimental to the surrounding area.

Response No. 21-8

In regard to the historic resources report prepared by Chattel Architecture, Planning & Preservation, Inc. (which is provided in Appendix IV.C of the Draft EIR) evaluation of potential historical resources, the commenter believes that there are several inconsistencies between the information presented and the conclusions reached. The most significant inconsistency, the commenter believes, pertains to the Columbia Savings building in that the Chattel report points out several architecturally distinct features within the text and yet, nevertheless, the conclusion is reached that the building does not have significant enough aesthetically valuable features to merit consideration as a historical resource. There is no contradiction. Please see also **Response No. 10-2**, above.

The commenter also states that it seems odd to claim that the project site has no connection or responsibility to the Miracle Mile Historic District when it is included in the design overlay created to protect that historic district. As the commenter notes, the property at the northern portion of the proposed project site is included within the Miracle Mile Community Design Overlay District (CDO), adopted into the Los Angeles Municipal Code as Ordinance No 176,332 effective as of January 16, 2005. The CDO was not created "to protect" the Miracle Mile Historic District as the commenter states, but rather it was intended "to provide guidance and direction in the design of new and rehabilitation of existing buildings and storefronts in order to improve the appearance, enhance the identity and promote the pedestrian environment of the [overlay] District." The CDO covers an area more expansive than the designated Miracle Mile Historic District, which is not uncommon in developing and implementing

design guidelines for conservation districts or neighborhood character areas where a core area may consist of a concentration of historic buildings. It should also be noted that the “district” established by the Miracle Mile CDO is by no means an historic district or coterminous with the designated Miracle Mile Historic District, rather it is a defined area or planning district delineated for the purposes of guiding future development by reinforcing the character of identified historic resources throughout the length of the CDO. As previously stated in the Chattel report, the project is not located in the Miracle Mile Historic District and would not adversely impact this district.

In addition, the Draft EIR does not state that the project has “no connection or responsibility toward the [CDO].” To the contrary, in Section IV.G (pages IV.G-16 and IV.G-17) of the Draft EIR specifically evaluates the project’s consistency with the CDO and concludes that project is consistent with the CDO guidelines.

Response No. 21-9

This commenter expresses a concern that the scale of the proposed development is incompatible with the adjacent residential neighborhood on Sycamore Avenue. Please see **Response No. 21-7** and **Response No. 7-2**, above, for a discussion of this topic. The Draft EIR concludes that no project-specific or cumulatively significant visual character, land use, or cultural resource impacts will result. The commenter does not identify any defects in this analysis and offers no substantial evidence to contradict the conclusion of the Draft EIR.

Response No. 21-10

Please see **Response No. 12-1**, above. As stated there, the population growth associated with the project and related projects would be consistent with the projections made for the Wilshire Community Plan Area.

Response No. 21-11

The commenter erroneously states that the Draft EIR did not give specific information about the 37 cumulative projects.

As stated on page IV.I-8 of the Draft EIR, SCAG’s 2004 Regional Transportation Plan Growth Forecast Report projects that the City of Los Angeles will add 61,739 dwelling units between 2005 and 2010.⁶ The proposed Wilshire and La Brea Project and the identified related projects would collectively add approximately 4,114 dwelling units, representing an approximately 6.7 percent (4,114 dwelling units of the projected 61,739 units) contribution towards the projected dwelling unit increase for the City of Los

⁶ Southern California Association of Governments, 2004 Regional Transportation Plan/Growth Vision: Socio-Economic Forecast Report, (2004).

Angeles. Based on the 2000 Census of approximately 2.17 persons per occupied multi-family housing the number of people generated from 4,114 multi-family dwelling units is approximately 8,930 persons.

As discussed in Section IV.I of the Draft EIR, SCAG projections forecast a 16.1 percent population increase in the City of Los Angeles between the year 2000 and 2030. In the more immediate short term, population is expected to grow from approximately 3,950,347 to 4,090,125 residents (an increase of 139,778 residents) in the City of Los Angeles between 2005 and 2010, which represents a 3.5 percent population increase. The related projects' population of 8,930 persons result in a 6.0 percent contribution to that short-term population growth of 139,778 persons. Therefore, population growth is forecast throughout the Los Angeles area, the anticipated population growth associated with this proposed project is accounted for within SCAG's growth projects, and with or without implementation of the proposed project, population growth is expected within the City of Los Angeles. The commenter has not addressed the adequacy or propriety of significance thresholds and has offered no evidence that any perceived increase in demand for municipal services and traffic congestion results in a significant impact compared to these established thresholds.

Response No. 21-12

Please see **Response No. 12-7**, above, for information about the provision of recreational space proposed as part of the project. As discussed in Section IV.J.4, Parks and Recreation, on page IV.J.4-10 of the Draft EIR, the recreation and open space amenities would also partially serve to meet the needs and demands of the new residents and serve to partially reduce demand for public recreation facilities potentially generated by the proposed project. However, due to the existing deficit of public parks and open space in the Wilshire Community Plan Area and City of Los Angeles, the project would still contribute additional demand for recreational and park facilities. As such, the project applicant would pay the in-lieu fee (based on current rates approximately \$3.8 million) to the City in accordance with the requirements of the City of Los Angeles (Ordinance No. 141422, amending Chapter 1, Article 7, of the Los Angeles Municipal Code). The Department of Recreation and Parks will use these fees to create new parks or enhance existing parks. Further, LAMC Section 17.12 expressly gives the applicant the option to pay fees in lieu of dedicating parkland. With payment of these fees, impacts related to parks and recreation would be reduced to a less than significant level.

Response No. 21-13

Please see **Response No. 12-3** for a detailed discussion of parking needs for the project and the adequacy of the parking that will be provided. Furthermore, the Metro Rapid bus service on Wilshire Boulevard, with an average daytime speed of 11.7 mph, currently operates at the lower end of Level of Service C. The Wilshire Bus Rapid Transit Final EIR/EIS states that "the Corridor's transit trips are expected to increase

at a much higher rate than total trips.” Therefore, additional transit studies (e.g., bus priority lanes) are being conducted for the Wilshire Corridor to provide added transit capacity. Although no projects have been approved, it is reasonable to assume that this heavily used transit corridor will receive additional transit capacity.

Response No. 21-14

The commenter seems to confuse the concepts of “alternatives that were considered but rejected” with the actual alternatives analyzed in the Draft EIR. CEQA requires an EIR to identify any alternatives that were considered by the City during the scoping practice but were rejected as infeasible. Also, CEQA requires analysis in the EIR of a reasonable range of feasible alternatives that can lessen the significant effects of the project while meeting the basic objectives of the project. The significant effects identified in the Draft EIR are short-term air quality and noise construction impacts and the project’s cumulative contribution to greenhouse gas emissions during construction and operation. The feasibility of these alternatives will be considered by the decision maker when deciding whether or not to approve the project. *State CEQA Guidelines* Section 15364 defines “feasible” as capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. Such factors include, among other things, site suitability, economic viability, availability of infrastructure, general plan consistency, jurisdictional boundaries, and the applicant’s access to an alternative site.

The lead agency initially considered two alternatives that were rejected as infeasible (1) a commercial and retail alternative that was rejected largely due to its failure to meet the basic project objective of producing much-needed housing, and (2) an alternative site alternative that was rejected due to the unavailability of a suitable alternative site in the Wilshire Community Plan area for a project of a similar scale. Also, as described above in **Response No. 10-1**, an alternative that would preserve and retain the Columbia Savings building would not reduce any significant impacts and would not be feasible.

The four alternatives analyzed in the Draft EIR are: (1) the No Project, No Build Alternative; (2) the No Project, Existing Zoning and General Plan; (3) the Reduced Density Alternative, and (4) the No Subterranean Parking Alternative. CEQA requires the Draft EIR to identify an environmentally superior alternative to assist the decision maker in weighing the merits of the project when compared to the project alternatives. Although Alternative 1 would avoid the environmental impacts associated with the project, it would not meet any of the project’s objectives. In addition, hazards and hazardous materials presently on the site would not be removed. Alternative 2 does not avoid any of the significant impacts associated with the project; also, by providing 541 fewer dwelling units, the project objectives of providing much needed housing and providing high quality housing in an underutilized urban area of

the City would not be achieved to the same extent as the proposed project. Alternative 3 also does not avoid any of the significant impacts associated with the project, and by providing 140 fewer units than the proposed project, the housing objectives mentioned above would also not be met to the same extent as the proposed project; also, by providing 140 fewer dwelling units, the financial ability to design a project that meets the City's green building ordinance standards may be undermined. Alternative 4 was selected as the environmentally superior alternative because it would lessen the overall amount of air quality emissions during project construction and would meet the project's objectives; however, the greater height of the buildings and the increased scale, bulk and mass of the building on Sycamore Avenue would create greater impacts with regard to aesthetics and historical resources.

The commenter also suggests that the Draft EIR should consider an additional project alternative that analyzes the environmental effects of a much lower-density mixed-use or commercial development along Wilshire Boulevard and/or La Brea Avenue with R2-density housing along Sycamore Avenue. The EIR, however, analyzes an alternative that is very similar if not identical to the one suggested by the commenter, Alternative 2 – No project, Existing Zoning and General Plan. This alternative proposes 21, 3-story, 33-foot-tall townhomes along Sycamore Avenue, which conforms to the R2-density suggested by the commenter. Under Alternative 2, overall residential density would be lower than that of the proposed project. The EIR also analyzes a reduced-density alternative. These and the other alternatives analyzed in the EIR represent a reasonable range of alternatives, and the additional alternative suggested by the commenter is not required.

Response No. 21-15

Please see **Response No. 21-1** through **Response No. 21-14**.

EIR CASE NO: ENV- 2007-1604-EIR

PROJECT NAME: WILSHIRE AND LA BREA PROJECT

5200 - 5224 WILSHIRE BOULEVARD 700- 758 LA BREA AVENUE,
719 -757 S. SYCAMORE AVE, LOS ANGELES, CA 90036

TOPIC: SYCAMORE TRAFFIC CONTROL DUE TO NEW BUILDING

ATT:

Simal Hewawitharanna & Jimmy Liao (213.978.1343) FX

I am writing concerning the potential traffic issues that will no doubt arise with respect to the proposed WILSHIRE AND LA BREA PROJECT.

The traffic on 800 & 900 blocks of Sycamore Ave is already congested and Sycamore should be a one way street traveling North or a cul de sac at 8th & Sycamore.

From our understanding parking exits for the condos and retail spaces exit onto Sycamore Ave. We would like to stop the increased congestion that will surely happen if a diversion is not put into place prior to the building being completed.

1

Sincerely,

Comment Letter No. 22

October 13, 2008

Glenn Han

Response No. 22-1

Please see **Response No. 13-1** for a discussion about why the suggested changes to Sycamore Avenue are not recommended for further consideration.

From: daniel.r.kegel@gmail.com on behalf of Dan Kegel [dank@kegel.com]
Sent: Monday, October 13, 2008 11:22 AM
To: jimmy.liao@lacity.org; srimal.hewawitharana@lacity.org
Cc: Elizabeth Fuller
Subject: Comment on Draft EIR ENV-2007-1604-EIR, Wilshire and La Brea Project

Hi Mr. Liao!
Is emailing you sufficient, or should I also fax this?
Thanks,
Dan Kegel
901 S. Sycamore

To:
Jimmy Liao, City Planner / EIR Unit Head
Room 750, City Hall
Department of City Planning
200 N. Spring St
Los Angeles, CA 90012

Re:
EIR Case No: ENV-2007-1604-EIR
Project Name: Wilshire and La Brea Project
Location: 5200-5224 Wilshire Boulevard

From:
Dan Kegel <dank@kegel.com>
901 S. Sycamore Ave
Los Angeles, CA 90036

Subject: Multiple concerns about proposed rezoning

As a resident and homeowner of the neighborhood for about a decade, I have serious concerns about the proposed rezoning and the proposed development.

Walkability / bikeability:

The nearby BRE development at 5600 Wilshire installed beautifully landscaped sidewalks on 8th Street, full of trees and plants and artfully zig-zaggy pathways. Sadly, they are not very walkable, and very definitely not bikeable. When a parent is taking a five year old on a bike trip around the block, it's important for there to be a clear straight path on the sidewalk to ride in.

A pathway that requires one to turn 90 degrees every few feet is hardly usable. It also makes it harder to pass other people passing the opposite direction. Since BRE screwed up the sidewalks so badly on their previous development, there is no reason to trust they will do better this time.

To be walkable, a sidewalk needs to be wide and unobstructed. This is especially true on a major street like La Brea or Wilshire, but still true even on quieter streets such as 8th and Sycamore, especially with the increased density caused by this development.

1

The project proposes to widen 8th street on both sides; this will reduce the walkability of this street significantly unless the sidewalk width is somehow maintained.

The project proposes simply taking the alleyway that parallels Wilshire away from public use with no compensation. That east-west space should instead be used to widen 8th Street and Wilshire Blvd, i.e. by moving the borders of the project inwards by the width of that alleyway.

This would allow the desired widening of those streets without giving up precious sidewalk space. Any net loss of unobstructed sidewalk width should be prohibited.

Lack of residential tower alternative:

Four alternative scenarios were considered, but the most logical one was omitted: no changes in zoning, while keeping the

2

tower along Wilshire as residential space. This would approximately halve the number of units, significantly reducing how the development impacts the surrounding neighborhood. As for shadow - that issue was decided already when the zoning was established, everybody in the area knows or should have known that tall towers are allowed on Wilshire.

2

That alternative is the best one from my point of view.
More to the point, no zoning variances are truly required to make this project a success.
Nothing I saw in their EIR demonstrates that denying the variances would constitute a hardship for BRE.

Increased Traffic

The EIR admits that the project would choke already clogged intersections further (with one car ever ten seconds during rush hour!), and claims that installing an ATCS at Wilshire / La Brea and Wilshire / Highland would fully mitigate this. However, the Traffic Impact Analysis provides no justification for this claim. Also, ATCS provides no benefit at individual intersections; it must be installed as part of a coordinated system.
No data was provided on the existing ATCS status of Wilshire Boulevard, nor on how the proposed ATCS improvements would fit into the existing system.

3

Transit System Capacity

I have ridden the Metro Rapid bus on Wilshire many times, and often it is way beyond capacity, forcing me to stand most of the way to Santa Monica.
The draft EIR on page IV-K-34 simply states with no supporting evidence that the additional riders will not overburden the bus system.

4

Sincerely,
Dan Kegeles

Comment Letter No. 23

October 13, 2008

Dan Kegel
901 S. Sycamore Avenue
Los Angeles, California 90036

Response No. 23-1

The sidewalks along all bordering streets on this project have been designed to be well proportioned, continuous, and straight while still including ample landscaping. Therefore, the sidewalks will be walkable.

In August 2007, the Citywide Planning Commission approved and adopted the Walkability Checklist as a tool used during the approval process for projects in the City. The purpose of the checklist is “to make developments more ‘walkable,’ that is, to enhance pedestrian activity, access, comfort, and safety.” The Checklist also encourages development to “protect neighborhood character and pursue high quality urban form.” An evaluation of the project’s walkability compared with the Walkability Checklist is provided in the Draft EIR in Section IV.G, Land Use, on pages IV.G-24 through IV.G-31. The project is considered “compatible” or “generally compatible” with the applicable Checklist items.

Response No. 23-2

The commenter suggests that an alternative evaluating development based upon current zoning and with a residential tower on Wilshire Boulevard be considered. The Draft EIR does include an alternative consistent with the current zoning. Please see **Response No. 21-14** which discusses the range of alternatives analyzed in the Draft EIR, and why this range is reasonable.

Response No. 23-3

The commenter states that the EIR does not justify how installing ATCS at Wilshire and La Brea will fully mitigate impacts at this intersection. The commenter, however, mischaracterizes this mitigation measures. LADOT’s September 10, 2007, project approval letter lists specific traffic system upgrades for the Wilshire Corridor traffic signal system to justify the traffic mitigation benefit assigned to the project (see Attachment 4 of the LADOT September 10, 2007, letter). Furthermore, the project’s traffic impacts will be fully mitigated through the implementation of all three mitigation measures listed in the traffic section of the Draft EIR, including MM-TRA-2, which requires ATCS improvements at the intersection of Wilshire Boulevard and Highland Avenue. The commenter correctly states that ATCS improvements provide no benefit at individual intersections and must be installed as part of a coordinated system. In fact, the ATCS improvements will be installed as part of a larger effort to upgrade the City’s traffic signals. As described in LADOT’s approval letter, attachment 4 “Wilshire West ATCS Sub-System

Implementation”, the traffic mitigation includes the installation of 1 closed circuit TV camera; 21 new upgraded traffic signal controllers at 21 intersections; and 43 system detectors at 11 intersections.

Response No. 23-4

Please see **Response 21-13**.

The following transit impact analysis is based on the 2004 Congestion Management Plan (CMP) guidelines for Transit Impact Review. Section D.8.4 of the CMP provides a methodology for estimating the number of transit trips to be generated by a proposed project. The CMP procedure assumes an average vehicle ridership (AVR) factor of 1.4 applied to the vehicle trips to estimate the number of person trips to and from the project. Since project site is located within a transit corridor being located on La Brea Avenue and Wilshire Boulevard, the CMP guidelines recommend using a transit mode split of approximately 5 percent and 7 percent of the total residential and commercial person trips, respectively. The project could therefore generate approximately 400 daily transit trips using the CMP mode split as a means of travel to and from the site. According to Metro, the current average weekday ridership on the Wilshire Corridor is approximately 100,000 weekday riders with an additional 15,000 on La Brea Line 212. Therefore, the project may add approximately 0.3 percent to the daily ridership, a less than significant increase. The current bus load factor has been calculated using Metro ridership data from the fourth quarter of 2007 at the Wilshire Boulevard and La Brea Avenue stops. The average passenger load per bus for Line 720 is 37 passengers per bus, or 65 percent of capacity (bus capacity is 57 seated passengers). The average passenger load per bus for Line 20 is 21 passengers per bus, or 50 percent of capacity (bus capacity is 42 seated passengers). The average passenger load per bus for Line 212 is 23 passengers per bus, or 55 percent of capacity (bus capacity is 42 seated passengers). Based upon this information, transit capacity is available for future transit riders generated by the project.

From: Mohsen Movaghar [msmovaghar@yahoo.com]
Sent: Monday, October 13, 2008 11:29 PM
To: srimal.hewawitharana@lacity.org
Cc: jimmy.liao@lacity.org
Subject: ENV-2007-1604-EIR

From: Mohsen Movaghar
732 S. La Brea Ave.
Los Angeles, CA 90036

To: Environmental Review Section
Los Angeles Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Reference: ENV-2007-1604-EIR

Attention: Jimmy C. Liao
Srimal Hewawitharana

Dear Sir or Madam:

I'm writing this letter to express my serious concern in reference to the above development project. Currently we are occupying store 732 on subject property, which is scheduled to be demolished for the new development.

There are two issues which we like to be included in the record.

A) At the time of sales transfer of the subject property from the previous owner to current owner, a soil test was conducted inside our office and despite our repeated request for any information no one responded. Perhaps your office may help us.

B) The second issue, which may not be in the scope of this hearing, is that we still have almost 4 more years left in our lease, and currently we are in the court to fight for our right.

1

Thank you
Mohsen Movaghar
T 310 420 1011

10/15/2008

Comment Letter No. 24

October 13, 2008

Mohsen Movaghar
732 S. La Brea Avenue
Los Angeles, California 90036

Response No. 24-1

The commenter is requesting a copy of a soil test conducted for the project site. Soil samples are discussed in sections IV.D, *Geology*, and IV.E, *Hazards* of the Draft EIR. Additionally, the geological investigation and the Phase I and Phase II reports are contained in Appendix IV.D and IV.E, respectively, of the Draft EIR.

With regard to the commenter's lease, it is a legal/economic issue that does not relate to the adequacy of the EIR. No further response is necessary. The comment will be provided to the decision makers for their review and consideration prior to any approval action on the project. As this comment is not directed at the environmental analysis or conclusions in the Draft EIR, no further response is required.

EIR CASE NO: ENV-2007-1604-EIR

PROJECT NAME: WILSHIRE AND LA BREA PROJECT

5200-5224 WILSHIRE BLVD 700-758 LA BREA AVENUE, 719-757 S. SYCAMORE AVE,
LOS ANGELES, CA 90036

TOPIC: SYCAMORE AVE TRAFFIC CONTROL DUE TO NEW DEVELOPMENT

ATTN:
Simai Hewawitharanna & Jimmy Liao
Via fax: 213.978.1343

I am writing to inform you of my great opposition to this proposed project. I object for the following reasons:

Traffic – the area is already faced with numerous traffic problems. From the designs shown at the block meetings, exits are to flood traffic onto Sycamore Ave. The block is too narrow to handle this much congestion. As it is now, with parked cars on either side – it is difficult for cars going opposite directions to pass each other on this narrow street. Here are a few suggestions to help with this problem should you continue with this project: making Sycamore a one way street traveling North – to not create anymore traffic down our block and protect the elementary school to the south.

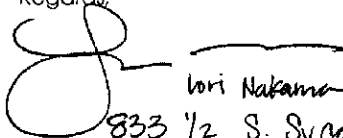
1

Waste of space – in the past 3 years several projects similar to this one have been built on 8th street further west and on Wilshire to the west & east of us. None of these locations have reached capacity due to extreme high rent. So the complete disregard of the integrity of the neighborhood is to waste money on housing that is unoccupied. I would understand and support the building of such places if they were in demand, but with the state of the economy I don't see a need for this tower of waste. Also your plan for 1st level retail stores is another waste – there are more than enough Starbuck's, Subways, video stores, frozen yogurt shops, within 4 blocks that don't do much business already.

2

Disruption to the neighborhood – I have lived in this neighborhood for over 35 years. It has always been a safe, quiet neighborhood set in the very busy city between the largest, most traveled streets in Los Angeles. With the unaffordable rent, there will no doubt be a revolving stream of tenants (if any) to the complex – bringing in temporary strangers in and out of the area on a constant basis.

3

Regards,

Lori Nakama
833 1/2 S. Sycamore Ave
323.394.0710

Comment Letter No. 25

October 13, 2008

Lori Nakama
833 ½ S. Sycamore Avenue
Los Angeles, California 90036

Response No. 25-1

Please see **Response No. 13-1** for a discussion about why the suggested changes to Sycamore Avenue are not recommended for further consideration, **Response No. 14-2** for a discussion of the street standards for Sycamore Avenue, and **Response No. 15-3** for a discussion of circulation on the project site and adjacent street.

Response No. 25-2

As discussed in Section II, Project Description, of the Draft EIR, one of the objectives of the proposed project is to provide multifamily residential housing in an urban area of the City of Los Angeles where there is substantial demand for such housing.

The impact of adding housing was analyzed in the Draft EIR in Section IV.I, Population and Housing. As stated on page IV.I-5, the implementation of the proposed project would result in the construction of 562 apartment units in the Wilshire Community Plan Area of Los Angeles. The provision of these 562 apartment units represents a 0.91 percent contribution towards the Southern California Association of Government's projected dwelling unit increase of 61,739 units within the City of Los Angeles between 2005 and 2010. As such, the additional housing that would be provided by the project is accounted for within growth projections for the City of Los Angeles and the Wilshire Community Plan Area, and implementation of the proposed project would not result in a significant impact. Further, this data supports the need for additional housing units.

As discussed in Section IV.I, Population, of the Draft EIR, according to SCAG's Growth Forecast, the annual population growth rate for the City of Los Angeles is projected to be approximately 0.5 percent; and the annual housing growth rate for the City of Los Angeles is projected to be approximately 0.9 percent. The population is forecast to grow from approximately 3,711,969 residents in 2000 to 4,309,625 residents in 2030, a 16.1 percent increase. The housing growth forecast projects an increase of available housing units from 1.3 million in 2000 to 1.66 million units in 2030, a 27.7 percent increase.

The City of Los Angeles General Plan contains projections of the reasonably expected population and dwelling unit count for the year 2010 within the Wilshire Community Plan Area, which includes the project site. These projections are based on the residential, commercial, and industrial densities and

intensities proposed by the Wilshire Community Plan. The Wilshire Community Plan projects a 23.56 percent population increase from 1990 to 2010 in the City of Los Angeles.⁷ The Wilshire Community Plan indicates that the reasonably expected population in the City in 2010 would be 4,306,564 people and the number of dwelling units would be 1,566,108.⁸ In 2000, the population of the Wilshire Community Plan Area was 292,059 with 120,112 housing units.⁹ The City estimates that in 2005 the population in the Wilshire Community Plan Area reached 310,225 with 122,047 housing unit.¹⁰ The data suggests that population within the Wilshire Community Plan Area will grow at a rate of 7.2 percent between 2005 and 2010, from 314,602 to 337,144 persons (an increase of 22,542 persons).¹¹

Additionally, the City of Los Angeles General Plan Housing Element identifies the following goals relative to the provision of housing in the City of Los Angeles:¹²

- **Goal 1:** A City where housing production and preservation result in an adequate supply of ownership and rental housing affordable to people of all income levels, races, ages and suitable for all needs.
- **Goal 2:** A City which actively takes steps to preserve, stabilize, and enhance livability/sustainability in all neighborhoods throughout the City and maintains the quality of life in all residential areas.
- **Goal 3:** A City where there are equal housing opportunities for all without discrimination.

Given the projected population growth, there is a need for additional housing. In addition, given the goals of the General Plan Housing Element there is also a need for the project's type of housing.

Several Project Objectives related to the provision of commercial uses in the project are identified in Section II, Project Description, of the Draft EIR and are provided below:

- to promote the use of public transportation by providing housing, retail shopping and dining opportunities adjacent to a major public transit corridor;
- to provide retail shopping and dining opportunities for the local community;
- to promote walkability by providing housing, retail shopping and dining opportunities in close proximity to adjacent commercial and residential uses;

⁷ *City of Los Angeles General Plan*, Chapter II, Background. 2002.

⁸ *Ibid.*

⁹ Los Angeles Department of City Planning/Demographics Research Unit. Local Area Profile, Wilshire Community Plan Area.

¹⁰ *Ibid.*

¹¹ City of Los Angeles, *Wilshire Community Plan*, 2001.

¹² Los Angeles Department of City Planning, "Housing Element," *City of Los Angeles General Plan*, (2002) Chapter V.

III. Responses to Written Comments on the Draft EIR

- to develop the site with land uses consistent with the intent of the Wilshire Community Plan and the Miracle Mile Community Design Overlay District Design Guidelines and Standards;
- to improve and integrate the streetscape along Wilshire Boulevard and La Brea Avenue; and
- to provide jobs within the Wilshire Community Area of Los Angeles.

Therefore, the provision of commercial uses is consistent with the goals of the City of Los Angeles and the Wilshire Community Area Plan.

Additionally, as discussed in Section II, Project Description, of the Draft EIR, the approximately 45,000-square-foot ground floor commercial component of the proposed project would consist of 37,000 square feet of retail space and 8,000 square feet of restaurant space. Of the 8,000 square feet of restaurant space, 5,000 square feet would be designated for high quality, low-turnover restaurant uses and 3,000 square feet would be designated for high-turnover restaurant uses. At this stage in the planning process exact retailers or restaurateurs are unknown.

Response No. 25-3

Please see **Response No. 19-5** regarding the provision of security features at the project site. The comment concerning the addition of new tenants to the neighborhood will be provided to the decision makers for their review and consideration prior to any approval action on the project. As this comment is not directed at the environmental analysis or conclusions in the Draft EIR, no further response is required.

From: Mroth2425@aol.com
Sent: Monday, October 13, 2008 7:36 PM
To: Srimal.Hewawitharana@lacity.org
Cc: Jimmy.Liao@lacity.org
Subject: Wilshire and La Brea project

eir case# env 2007-1604-eir

I am very concerned that the above project has not allocated enough parking spaces for both Residential and Business activity.

I am very concerned that there will be spillover onto the surrounding residential streets that already have limited street parking.

1

Thank you for your consideration to this important matter.

Yours truly,

Muriel Rothenberg
855 S. Citrus Avenue
Los Angeles, Ca. 90036-4930

New **MapQuest Local** shows what's happening at your destination. Dining, Movies, Events, News & more. [Try it out!](#)

10/15/2008

Comment Letter No. 26

October 13, 2008

Muriel Rothenberg
855 S. Citrus Avenue
Los Angeles, California 90036

Response No. 26-1

Please see **Response No. 12-3** for a detailed discussion of parking needs for the project and the adequacy of the parking that will be provided.

FAX

To: **Simal Hewawitharanna & Jimmy Liao** Fax #: **(213) 978-1343**

From: **Ronald & Nancy Sakall** Date: **October 13, 2008**

Re: **EIR Case No: ENV-2007-1604-EIR** **5200 - 5224 Wilshire Blvd. and**

Pages: **ONE** including transmittal page **La Brea Avenue**

Urgent For Review Please Comment Please Reply Please Recycle

Project Name: Wilshire and La Brea Project

Topic: Traffic Control on Sycamore Avenue during construction

We are writing concerning the traffic issues that will arise during the construction of this **WILSHIRE AND LA BREA PROJECT**. As all of you are aware, we have very narrow streets. We propose that you should consider making Sycamore Avenue a one-way thoroughfare, going north from Olympic Blvd. to 8th Street. We would also desire the placement of Speed Humps to slow down traffic on Sycamore Avenue and by the Elementary school. **Wilshire-Crest Elementary School** is at 9th Street and Sycamore Avenue. The parents and School buses drop off children on Sycamore Avenue and 9th Street. The special needs Children walk with white canes, in wheelchairs, or using crutches. Heavy dirt moving Trucks should not be traveling on Sycamore Avenue. The weight of these trucks is too Heavy for residential streets. The other issue is passage, with cars parked on both sides Of the street, there is only room for one vehicle to pass most times.

1

Thank you for your consideration in this matter,

Ronald & Nancy Sakall
857 S. Sycamore Avenue
Los Angeles, CA 90036-4909
(323) 931-5317

Comment Letter No. 27

October 13, 2008

Ronald and Nancy Sakall
857 S. Sycamore Avenue
Los Angeles, California 90036

Response No. 27-1

Please see **Response No. 7-3** for a discussion of the methodology used to evaluate traffic impacts, **Response No. 13-1** for a discussion about why the suggested changes to Sycamore Avenue are not recommended for further consideration, and **Response No. 15-3** for a discussion of circulation on the project site and adjacent streets.

As stated in **Response No 19-4**, using the LADOT policies and procedures for neighborhood traffic impacts, it was determined that the project's daily traffic generation would not cause any significant neighborhood traffic impacts.

Construction mitigation measure MM-AQ-1 and on pages IV.B-58 and IV.B-59 of the Draft EIR includes measures to mitigate potential impacts related to construction traffic on local streets.

As stated in **Response No 19-8**, LADOT provides a safe route to school map for the Wilshire Crest Elementary school. All suggested walking routes to the school provide for safe street crossings controlled by traffic signals or stop signs to protect the movements of pedestrians along these routes to school.

As stated in **Response No. 21-5**, the neighborhood traffic impact analysis for the project did not warrant the installation of speed humps or any other neighborhood traffic control measures.

Excavation and haul trucks would travel down La Brea Avenue to Interstate 10, which is similar to the route approved for other projects in the vicinity. The exact points of egress on the project site and travel patterns would be determined by construction phasing and would be approved by the City. Trucks could enter the site from La Brea Avenue, and exit onto 8th Street en route to La Brea Avenue. Trucks could also come out on Sycamore Avenue, on the north end near the current alley, and would take the most direct route to La Brea Avenue, which is north to Wilshire and west to La Brea Avenue, then south to Interstate 10.

From: Devy Schonfeld [devyschonfeld@gmail.com]
Sent: Monday, October 13, 2008 10:50 AM
To: Srimal.Hewawitharana@lacity.org; Jimmy.Liao@lacity.org
Subject: EIR Case File No. ENV-2007-1604-EIR

Dear Mr. Hewawitharana and Mr. Liao:

I refer to the case number noted in the subject line of this email message.

Regarding the proposed development of the above project, our neighborhood is concerned with the following issues detailed below:

- The impact of increased traffic and parking on our street. There are currently many children on bicycles and on foot, and the impact of increased traffic will most certainly be detrimental to their safety. We ask that Brea development assist the local neighborhood with the installation of bumps/humps to deter/slow through traffic. 1
- Inclusion of ample underground and dedicated parking areas for the development. We DO NOT want ownersvisitors to the site parking within our neighborhood. 2
- The importance of including additional trees and green space for children and dogs within the development. There are currently no green spaces available within the immediate neighborhood, and with increased pedestrian and vehicular traffic such an "oasis" will be critical. Access to these green spaces should be provided to all within the neighborhood. 3
- As you are likely aware, our neighborhood has experienced increased crime of late. There have been two shootings related to the medical marijuana clinics, and several more robberies and burglaries. It will be imperative that there be increased lighting and security presence within the new development to thwart these type of events. 4
- Green construction. We ask that the building be LEEDS or CHIPS certified, and use sustainable methods of construction that has minimal impact on the environment. Additionally, we ask that the construction process be minimally intrusive to the local neighborhood in terms of noise levels, sidewalk closures and crew work hours. Specifically we ask that construction only be permitted Monday-Friday from 8am - 4pm and no exception permits be granted beyond these hours. 5
- We ask that the neighborhood be alerted of any environmental remediation that may potentially affect air quality or provide any other safety hazard to the surroundings. 6
- We ask that the design aesthetics of the building keep in-line with the neighborhood and the Wilshire corridor in general. The current design being implemented by the BMW dealership was chosen entirely to benefit BMW's global brand and the neighborhood views on the design were completely disregarded. We request that the neighborhood be given many opportunities to comment on the proposed design of the site, and ask that those comments be taken seriously and be incorporated into the design of the building. 7
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10/15/2008

Overall, with the new construction of the BMW dealership and now the development of this large complex our neighborhood is increasingly losing its "local feeling". While we are not immediately opposed to such developments, we have to INSIST that they are managed with consideration to the existing neighbors. We ask that the new development give ample opportunity to the neighborhood to provide their input --specifically we ask for monthly meetings to be scheduled between the developers and the neighborhood -- which will help us all contribute to the feeling of local community, safety and camaraderie that is essential to the well-being of our neighborhood.

9

Any questions, please don't hesitate to contact me via email.

Regards,

Devy Schonfeld
Citrus Avenue

10/15/2008

Comment Letter No. 28

October 13, 2008

Devy Schonfeld
Citrus Avenue
Los Angeles, California 90036

Response No. 28-1

The request for a neighborhood traffic mitigation plan funded by the project is currently not a traffic mitigation measure required by LADOT. Please see Section IV.K, Transportation, of the Draft EIR for more information about traffic impacts and transportation-related mitigation measures identified to reduce traffic impacts to less than significant levels. Also, LADOT provides a safe route to school map for the Wilshire Crest Elementary school. All suggested walking routes to the school provide for safe street crossings controlled by traffic signals or stop signs to protect the movements of pedestrians along these routes to school. Please see **Response No. 13-1** regarding traffic calming measures suggested by commenters.

Response No. 28-2

Please see **Response No. 12-3** for a detailed discussion of parking needs for the project and the adequacy of the parking that will be provided.

Response No. 28-3.

The commenter notes the importance of including additional trees and green space within the development for use by the neighborhood. Figure II-11, Landscape Plans, in the Draft EIR illustrates the landscaping plans for the 1st/Ground and 2nd/Podium Levels for the proposed project. As shown, on Sycamore Avenue, a 15-foot-wide setback would allow for development of a 5,400-square-foot linear park along Sycamore Avenue and a 1,600-square-foot landscaped area at the corner of Sycamore Avenue and 8th Street for use by both residents of the building and the neighborhood. On Wilshire Boulevard and La Brea Avenue, the building setbacks would allow for some planting areas to be established adjacent to the building. In addition, along those two streets, landscaped planters would be located curbside in a row which would allow a double layer of landscaping along many areas of the sidewalk.

Response No. 28-4

Please see **Response No. 19-5**, above for a discussion of the security features that will be included in the proposed project.

Response No. 28-5

As stated in the Project Description on page IV.2-17, the proposed project would meet the standards contained in the City's Green Building Ordinance. This process is intended to promote a whole-building approach to sustainability by incorporating a checklist of green practices into building plans. The checklist includes a choice of items such as low-flow toilets, use of recycled materials, and use of natural light. The design of the project will incorporate features and systems that enable the building to perform better in its overall use of available resources than a comparable sample of other projects. Special attention will be given to energy conservation, water conservation, waste reduction and management, and indoor air quality. Targets for the building's performance are derived from the standards established by the United States Green Building Council in its Leadership in Energy and Environmental Design (LEED) program. In addition, the project would seek Silver Certification on LEED rating system.

Response No. 28-6

The applicant requests that construction be permitted only Monday through Friday from 8:00 AM until 4:00 PM. As proposed, and as discussed in the Project Description on pages II-16 and II-27 of the Draft EIR, construction would last approximately 36 months. A reduction in the number of hours per day and days per week construction occurs would extend the construction period to approximately 49 months.

Noise impacts resulting from project construction are discussed in Section IV.H, Noise, of the Draft EIR. As stated therein, the project applicant will comply with Section 41.40 of the City of Los Angeles Noise Ordinance, which states that construction operations shall be limited to the hours of 7:00 AM to 9:00 PM Monday through Friday and 8:00 AM to 6:00 PM on Saturdays and holidays. In compliance with the Noise Ordinance, no construction activities shall occur on Sundays. In addition, the project applicant will comply with Section 112.05 of the City of Los Angeles Noise Ordinance, which states that all technically feasible measures shall be implemented to reduce noise levels of construction equipment operating within 500 feet of residential areas in cases where noise levels exceed 75 dB(A) at 50 feet from the noise source.

In addition, mitigation measures MM-N-1 through MM-N-7 on pages IV.H-23 and IV.H-24 of the Draft EIR are intended to reduce construction noise impacts to the extent feasible.

Response No. 28-7

The Draft EIR analyzed potential impacts related to hazards in Section IV.E, Hazards and Hazardous Materials. Mitigation measures, which require the implementation of a Removal Action Workplan (RAW) and Risk Management Plan (RMP), would reduce the risk of exposure to people to soil or groundwater contamination during either construction or operation of the proposed project to a less than significant level. Recommended mitigation measures to remove and properly dispose of asbestos-containing

building materials (ACBM) and lead-based paint (LBP) would reduce potential impact from these materials to less than significant levels. With implementation of these mitigation measures, potential impacts related to air quality or other safety hazards would be reduced to less than significant levels. The Mitigation Monitoring Program (MMP) in **Section IV** of this Final EIR is designed to monitor implementation of the mitigation measures required for the Wilshire and La Brea Project. More information regarding the MMP is provided in **Response No. 19-3**.

Response No. 28-8

The design team has solicited and received, and will continue to receive, comments from the neighborhood regarding the proposed design of the building. Many of these have been considered and worked into the building design.

Response No. 28-9

The Applicant has and continues to meet with the neighbors and interested stakeholders to discuss the proposed project, and encourages the public's participation in the planning process. The Applicant has been meeting regularly with the Working Group, a committee of interested neighbors that was formed by Council District 4 for the purpose of reviewing plans for the Wilshire and La Brea Project site. The group represents stakeholders from various neighborhood and community organizations in the Miracle Mile area. Project information has also been presented to the Miracle Mile Chamber of Commerce and the Greater Wilshire Neighborhood Council. The commenter may contact Liz Fuller, who is chair of the Working Group, about their concerns and attending future meetings.

EIR CASE NO: ENV- 2007-1604-EIR

PROJECT NAME: WILSHIRE AND LA BREA PROJECT

5200 - 5224 WILSHIRE BOULEVARD 700- 758 LA BREA AVENUE,
719 -757 S. SYCAMORE AVE, LOS ANGELES, CA 90036

TOPIC: SYCAMORE TRAFFIC CONTROL DUE TO NEW BUILDING

ATT:

Simal Hewawitharanna & Jimmy Liao (213 978 1343) FX

I am writing concerning the potential traffic issues that will no doubt arise with respect to the proposed WILSHIRE AND LA BREA PROJECT.

The traffic on 800 & 900 blocks of Sycamore Ave is already congested and Sycamore should be a one way street traveling North or a cul de sac at 8th & Sycamore.

From our understanding parking exits for the condos and retail spaces exit onto Sycamore Ave. We would like to stop the increased congestion that will surely happen if a diversion is not put into place prior to the building being completed.

1

Sincerely,

Matt Tenggren 835 S. Sycamore Ave

Shocie M. Lianag 323 937-3575
843 S. Sycamore Ave

323 935 8038
Wayne L. Scambler 845 S. Sycamore Ave.
323 935-9967

Comment Letter No. 29

October 13, 2008

Matt Tenggren
835 S. Sycamore Avenue
Los Angeles, California 90036

Frocie M. Liwanag
843 S. Sycamore Avenue
Los Angeles, California 90036

Mayoni L. Scanlon
845 S. Sycamore Avenue
Los Angeles, California 90036

Response No. 29-1

Please see **Response No. 13-1** for a discussion about why the suggested changes to Sycamore Avenue are not recommended for further consideration.

EIR CASE NO: ENV- 2007-1604-EIR

PROJECT NAME: WILSHIRE AND LA BREA PROJECT

5200 - 5224 WILSHIRE BOULEVARD 700- 758 LA BREA AVENUE,
719 -757 S. SYCAMORE AVE, LOS ANGELES, CA 90036

TOPIC: SYCAMORE TRAFFIC CONTROL DUE TO NEW BUILDING

ATT:

Simal Hewawitharanna & Jimmy Liao (213 978 1343) FX

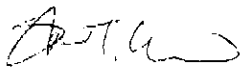
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1

Sincerely,



Comment Letter No. 30

October 13, 2008

Brent Winn

Response No. 30-1

Please see **Response No. 13-1** for a discussion about why the suggested changes to Sycamore Avenue are not recommended for further consideration.

EIR CASE NO: ENV- 2007-1604-EIR

PROJECT NAME: WILSHIRE AND LA BREA PROJECT

5200 - 5224 WILSHIRE BOULEVARD 700- 758 LA BREA AVENUE,

719 -757 S. SYCAMORE AVE, LOS ANGELES, CA 90036

TOPIC: SYCAMORE TRAFFIC CONTROL DUE TO NEW BUILDING

ATT:

Simal Hewawitharanna & Jimmy Liao (213 978 1343) FX


I am writing concerning the potential traffic issues that will no doubt arise with respect to the proposed WILSHIRE AND LA BREA PROJECT.

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From our understanding parking exits for the condos and retail spaces exit onto Sycamore Ave. We would like to stop the increased congestion that will surely happen if a diversion is not put into place prior to the building being completed.

1

Sincerely,


833 S. Sycamore Ave

Comment Letter No. 31

October 13, 2008

Helen H. Nakama
833 S. Sycamore Avenue
Los Angeles, California 90036

Response No. 31-1

Please see **Response No. 13-1** for a discussion about why the suggested changes to Sycamore Avenue are not recommended for further consideration.