GENERAL INFORMATION ABOUT THE CONTENTS OF THIS FILE

Submissions by the public in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3, are distributed to the Commission and uploaded online. Please note that "compliance" means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. Please review the Commission ROPs to ensure that you meet the submission requirements. The ROPs can be accessed at **http://planning.lacity.org**, by selecting "Commissions & Hearings" and selecting the specific Commission.

All compliant submissions may be accessed as follows:

- **"Initial Submissions"**: Compliant submissions received no later than by end of day Monday of the week prior to the meeting, which are not integrated by reference or exhibit in the Staff Report, will be appended at the end of the Staff Report. The Staff Report is linked to the case number on the specific meeting agenda.

- **"Secondary Submissions"**: Submissions received after the Initial Submission deadline up to 48-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.

- **"Day of Hearing Submissions"**: Submissions after the Secondary Submission deadline up to and including the day of the Commission meeting will be uploaded to this file within two business days after the Commission meeting.

Material which does not comply with the submission rules is not distributed to the Commission.

ENABLE BOOKMARS ONLINE:

**If you are using Explorer, you need will need to enable the Acrobat  toolbar to see the bookmarks on the left side of the screen.

If you are using Chrome, the bookmarks are on the upper right-side of the screen. If you do not want to use the bookmarks, simply scroll through the file.

If you have any questions, please contact the Commission Office at (213) 978-1300.

SECONDARY SUBMISSIONS

Item No. 7

Department of City Planning

City Hall, 200 North Spring Street, Room 272, Los Angeles, CA 90012

December 10, 2024

TO: City Planning Commission

FROM: Paul Caporaso, City Planner

TECHNICAL CORRECTION TO STAFF RECOMMENDATION REPORT FOR CASE NO. CPC-2017-247-GPAJ-VZCJ-HD-SN-SPPE-MCUP-CU2-ZV LOCATED AT 606-612, 638-694, AND 679-689 SOUTH MESQUIT STREET, 1494-1498 EAST 6TH STREET, AND 2119-2135 EAST 7TH STREET

The following technical correction is presented for your consideration to be incorporated into the Staff Recommendation Report related to Item No. 7 on the meeting agenda for the City Planning Commission meeting of December 12, 2024. Deleted text is shown in ~~**strikethrough**~~ and added text is shown in **underline**.

The following Recommended Action was inadvertently omitted from the CPC Staff Recommendation Report and shall added after the Developer Incentives. All following Recommended Actions shall be renumbered accordingly.

4. Recommend that the City Council Approve the establishment of a Sign District "-SN" Supplemental Use District to regulate signage within the Project Site.

Planning CPC <cpc@lacity.org>

Project CPC 20223-6287- CU-DB-HCA

dglosangeles@aol.com <dglosangeles@aol.com> Tue, Dec 10, 2024 at 9:42 AM
To: "cpc@lacity.org" <cpc@lacity.org>

To Whom It May Concern,

I am writing regarding the proposed construction at 1463 So. Wellesley Ave., Los Angeles, CA 90025.

I am a tenant at the adjoining business building at 12304 Santa Monica Ave. and have an office facing the proposed project site. I am very deeply concerned about the noise level and dust level that will be taking place over several weeks to months if the construction goes forward. I am a clinical psychologist and engage in work requiring quiet, calm and focus. I have deep concerns that I will not be able to meet with patients if there is ongoing noise and other pollution. The proposed 3' barrier is certainly not adequate to protect my office from the disruptive noise that will be created, in addition to the parking difficulties very likely to take place over several weeks. I sincerely hope that these concerns, shared by many tenants in this building, will be taken seriously and more protective measures will be taken.

Sincerely,

David S. Gordon, Ph.D.
PSY9769
(310) 207-3778

P: (626) 381-9248
F: (626) 389-5414
E: info@mitchtsailaw.com

Mitchell M. Tsai
Law Firm

139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

December 9, 2024

Planning Commissioners
Stephanie Escobar, Planning Associate
Expedited Processing Department
City of Los Angeles
200 N. Spring St.
Los Angeles, CA 90012
Tel.: (213) 978-1492
Em: cpc@lacity.org
Em: stephanie.escobar@lacity.org

RE: December 12, 2024 City Planning Commission Hearing Agenda Item No. 8: Supplemental Comment (Shortened) on "Sunset Vine—SV2" Project at 6266-6290 Sunset Blvd.; 1460 – 1480 Vine St.; 6251 – 6267 Leland Way; and its SCEA (ENV-2021-10589-SCEA; CPC-2021-10588-DB-MCUP-SPR-VHCA)[1]

Honorably Mayor and Councilmembers:

On behalf of the Western States Regional Council of Carpenters ("**Western Carpenters**" or "**WSRCC**"), my Office is submitting these supplemental comments regarding the Sustainable Communities Environmental Assessment ("**SCEA**"), as well

[1] The agenda and 3,930-page staff report for the December 12, 2024 CPC hearing on Agenda Item 8 were posted by the City only on December 4, 2024 – i.e., after the Monday, December 2, 2024. In addition, while our Office has asked for an official advanced notice for the hearing, we have not received any official notice of the December 12, 2024 hearing, and we found out about the hearing only upon inquiry to the City.
Our office, therefore, needed time to review the posted agenda and staff report and presented a ***detailed*** submission on December 6, 2024 **in excess of 10 pages** and **with Exhibits 1-21**, requesting that it be accepted, printed out, and shared with the Planning Commissioners. However, we are hereby also presenting a ***shortened*** version of that detailed December 6, 2024 submission, in the event the City disregards our request to accept the detailed version of the letter and chooses to only add our *detailed* December 6, 2024 letter to the administrative record but otherwise not present it to the planning commissioners.

as the sought entitlement approvals for the "Sunset Vine—SV2" Project proposed at 6266 W. Sunset Blvd. ("**Project**") in the City of Los Angeles, CA ("**City**").

The WSRCC is a labor union representing almost 90,000 union carpenters in 12 states, including California, and has a strong interest in well-ordered land use planning and in addressing the environmental impacts of development projects.

Individual members of the Western Carpenters live, work, and recreate in the City and surrounding communities and would be directly affected by the Project's environmental impacts.

The Western Carpenters expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearing and proceeding related to this Project. Gov. Code, § 65009, subd. (b); Pub. Res. Code, § 21177, subd. (a); see *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1199-1203; see also *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal.App.4th 1109, 1121.

The Western Carpenters incorporates by reference its **October 25, 2024 Comment Letter**, as well as all comments raising issues regarding the CEQA determinations and entitlements of the Project. See *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal.App.4th 173, 191 (finding that any party who has objected to the project's environmental documentation may assert any issue timely raised by other parties).

Moreover, the Western Carpenters requests that the City provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act (**CEQA**) (Pub. Res. Code, § 21000 *et seq.*), and the California Planning and Zoning Law ("**Planning and Zoning Law**") (Gov. Code, §§ 65000–65010). California Public Resources Code Sections 21092.2 and 21167(f) and California Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body. We hereby also request that the City *email* such notices to our Office at info@mitchtsailaw.com.

Lastly, even though no such request is required, we nonetheless **specifically request** that all the hyperlinks in this letter be submitted to the agency, be deemed as submitted, and be included in the City's control file for the Project. (*Consolidated Irrigation Dist. v. Superior Court* (2012) 205 Cal.App.4th 697, 724–725 [the information

provided in hyperlinks to specific websites is readily available to agency personnel and hence "the burden placed on lead agency personnel is minimal."].)

I. THE PROJECT MAY HAVE SIGNIFICANT IMPACTS, INCLUDING THOSE REQUIRING MANDATORY FINDINGS OF SIGNIFICANCE AND PREPARATION OF AN EIR

A. The SCEA's Air Quality Impact Analysis Is Flawed as It Relies on Flawed Assumptions and Also Ignores the Project's Adverse Impacts on Human Beings in Disadvantaged Communities, Requiring Mandatory Findings of Significance and an EIR.

In addition to the issues identified in our October 25, 2024 letter, the SCEA's air quality and related health impacts analysis is flawed, as a matter of law, for several reasons. First, the SCEA ignores and underreports the sensitive receptors near the Project site and hence the Project's impacts on them. (SCEA, p. 201, emph. added.)

The SCEA's information, however, appears to be inaccurate since there is at least **one school** within **0.25 miles** from the Project: the **Los Angeles Film School**[2] located at 6363 Sunset Blvd., Los Angeles, 90028. The Los Angeles Film School is located **within 0.1 miles** of the Project, and, as of 2022, the enrollment of students at the Los Angeles Film School was 100% and reached 5,588 students. Also, while the SCEA mentions that the Joseph Le Conte Middle school and its co-located Citizens of the World Charter (elementary and middle) Schools are 0.7 miles away from the Project site, in fact it is only **0.46 miles** away. Similarly, while SCEA mentions that the Selma Avenue School and Larchmont Charter School are bot 0.7 miles away, based on ZIMAS measurement tool, it is actually **0.4 miles away**. Apparently, the SCEA measured proximity of the schools based on *driving* rather than in a straight line, which is how air and other impacts disperse.

It is undisputed that air quality and air pollution affect human health and safety. (*Association of Irritated Residents v. San Joaquin Valley Unified Air Polution Control Dist.* (2008) 168 Cal.App.4th 535, 548-549.)

[2] See https://www.lafilm.edu/?gad_source=6&gclid=CjwKCAiA9IC6BhA3EiwAsbltOEuOZIsHFFKx2ddpDPw0-UClxQCOYr9xIedPB2arTGkWhfEuYWVt-hoCDTUQAvD_BwE

As a result, the SCEA ignores the Project's air quality and adverse health and safety impacts to Selma Elementary school's **560 students**, the co-located Larchmont Charter School's **595 students,** the Joseph Le Conte's school's **659 students**, of whom 94% are reportedly from the economically disadvantaged population, the co-located Citizens of the World Charter School's **428 students**, of whom about 49% are economically disadvantaged, and the Los Angeles Film School's **5,588** students.)

Second, the SCEA's air quality impact analysis is flawed as it ignores the fact that the Project is located in the *disadvantaged community area,* based on the EPA's mapping.

CEQA requires mandatory findings of significant impacts where, *inter alia,* the project's cumulative impacts with other similar projects may have a significant impact and also where the environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly. (CEQA Guidelines § 15065(a)(4).)

The Project's proximity to so many other projects, including schools and residences, supports the fair argument that the Project's cumulative air/GHG impacts are significant and present significant risks to human beings, requiring mandatory findings of significance and an EIR. (CEQA Guidelines § 15065(a)(3)-(4).)

B. <u>The SCEA's Impact Analysis of Historical Resources Is Flawed and the Project May Have Historical and Related Aesthetic Impacts, requiring an EIR.</u>

For reasons mentioned in our previous October 25, 2024 comment, an EIR is required here since the SCEA's analysis of the Project's impacts on historical resources is flawed and reveals significant impacts to a designated historical resource.

First, based on our review of cases, there are no cases that uphold a SCEA where, as here, the Project was proposed *next* to a designated historic resource and involves significant demolition and construction work for a monstrosity. Second, the Project proposes its own *modifications* to the *very* historic resource and a yet uncertain future use (presently reported to be a restaurant). Notably, the same Project Applicant converted the 19-story tower of office uses to 64 live-work units, and can do the same here.

Third, the SCEA presumes that *just because* the Project will not physically *demolish* that resource and also *just because* they will allegedly simply *adaptively reuse* the Morgan Camera Shop as a restaurant, or add structures to it, the Project will not affect the historical significance of the admittedly historic building. The SCEA also presumes that the existing old building will not be damaged as a result of the massive demolition

and construction vibrations next door. These presumptions need to be presented and verified in an EIR and do not warrant a streamlined environmental review of SCEA.

Similarly, in *Glendale Historical Society v. City of Glendale, et al.,* December 1, 2022 LASC Case No. 21STCP01832, the Court found that the agency abused its discretion by disregarding impacts of a Project to a designated historic resource of a craftsman home – the northern porch and the wide setback of the building.

Fourth, the Project's impacts on the designated historical resource are even more compelling since the Project is located in the Hollywood Redevelopment Plan, which requires its own strict protections for historic resources.

Fifth, CEQA provisions related to "historical resource[s]" above, the CEQA Guidelines establish a rebuttable presumption [that] any substantial, negative *aesthetic effect* [caused by a proposed project] is to be considered a significant environmental impact for CEQA purposes." *(Quail Botanical Gardens Foundation, Inc., supra*, 29 Cal.App.4th 1597, 1604.) The aesthetic effects contemplated by CEQA include "[aesthetic] impacts on public and private views and on the historic character of the project site and surrounding area." (*Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560, 577; *see Protect Niles v. City of Fremont* (2018) 25 Cal.App.5th 1129, 1145 ("*Protect Niles*") [holding, "a project's visual impact on a surrounding officially-designated historical district is appropriate aesthetic impact review under CEQA."].)

For these reasons, too, the Project requires an EIR for historic and aesthetic impacts.

C. <u>The SCEA's GHG Impacts Analysis Is Flawed; the Project May Have Significant GHG Impacts.</u>

In addition to the points raised in our initial comment letter of October 25, 2024, the Project may have significant GHG impacts – both individually and cumulatively – also in light of the fact that the Project is located in the disadvantaged community area, which is already plagued with GHG impacts, as discussed in the Section I.A, *supra.*

First, to address the disproportionate impacts of air pollution and GHG on disadvantaged communities, the State has passed SB 535, 1000, 617, etc. The Project ignores these state goals. Second, GHG emissions are adverse to human health.

Moreover, even though the SCEA mentioned SB 32 a few times (SCEA, pp. 178 & 184), it predominantly references AB 32, whereas SB 32 is more demanding and – as compared with the AB 32's goals – required 40% reduction of GHG.

As such, the SCEA is flawed for its findings of no GHG impacts, and the Project requires at least a preliminary HRA and an EIR to study GHG impacts.

D. The SCEA's Hazards and Hazardous Materials' Analysis Is Flawed.

As also noted in our October 25, 2024 comment, the SCEA understates the Project's hazards impacts. The SCEA admits the presence of chemicals on the Project site including due to the fact that Chipotle is listed as a "chemical storage", and yet speculates that those red flags are "likely" due to "detergent" or "laundering" activities, and – based on such speculations – concludes that the Project "would not create" a significant hazard to the public or will have insignificant impacts. But this conclusion is unsupported by evidence; in fact, the evidence compels the opposite.

Critically, the Phase I ESA claims to "conform[]" to the procedures outlined in the ASTM E-1527-21, but it clearly does not. In form and substance, it uses the older ASTM 2013 definition of a REC and disregards *likely* contamination.

For these reasons, too, the SCEA's hazards impact analysis is flawed.

E. The SCEA's Analyses of Land Use Impact Is Flawed, Including Because of the Project's Inconsistency with the Hollywood Redevelopment Plan and other Applicable Development Policies and Plans Which the SCEA Failed to Note.

In addition to the issues raised in our initial October 25, 2024 Comment letter, the SCEA's land-use impacts analysis is flawed for many reasons. First, as mentioned above, the Project fails to duly comply with the General Plan's policies and elements aimed at mitigating environmental impacts especially in the disadvantaged community area as here. Among many things, the Project will adversely affect the health and safety of the surrounding disadvantaged communities and thereby frustrate the policies of the General Plan Elements, including the Plan of Healthy LA.

Second, the Project fails to duly disclose the Project's conflicts with the Hollywood Redevelopment Plan ("**HRP**"). Notably, HRP was developed with certain density and intensity limits and design features aimed to mitigate certain environmental impacts, and it also has special provisions and protections for historical resources. Among other things, the Project will demolish a now-vacant duplex, which – based on ZIMAS information – was occupied within the past 5 years. It is unclear if the Project has duly provided relocation for the displaced people or if it will replace the demolished units.

HRP Section 511 also provides additional protections for historical resources, such as the one involved in this case. The HRP density controls and other protections were adopted as mitigation measures to various impacts, as proposed by the environmental impact reports for the Plan and its further amendments.[3]

In addition, the Project and its SCEA fail to acknowledge, disclose, and comply with the additional development policies and requirements for *commercial corner* development, including parking, noise, hours of operation, height, signs, and others. (See, LAMC 12.22.A23[4] & LA City Manual at pp. 225-231 [pdf pp. 239-245][5].)

In sum, the SCEA disregards the Project's conflicts with numerous applicable land use policies, aimed at mitigating impacts, and the associated land use impacts of the Project. This both makes the SCEA inadequate and also identifies potential land use impacts requiring an EIR to provide an in-depth review and mitigation of impacts.

F. <u>The Project and Its SCEA Violate CEQA as They Engage in Piecemealing and Fail to Consider the Impacts of Sunset Vine Phase I along with the Project.</u>

As we have noted in our October 25, 2024 comment letter, the Project's environmental review, including in SCEA, is flawed since the Project Applicant has engaged in piecemealing. This is also true since the SCEA fails to consider the impacts of Phase I of the Sunset Vine project – the 64-unit project in the 19-story tower on the Project Site and the conversion and adaptive reuse of commercial units into residential uses – while proposing Sunset Vine Phase II. In an analogous scenario, where there was evidence of a phased development, the Court agreed that the environmental review of the subsequent project must necessarily include impacts of the prior project and must include the accurate baseline of the prior project.

Similarly here, the SCEA's environmental analysis was improperly piecemealed and tainted, and the Project's impacts are understated since the SCEA considers, if at all, the *baseline* of the 19-story building with the *present* residential uses, which are far more

---

[3] *See* pdf pp. 24-25 of the Hollywood Community Plan Draft EIR, Land Use Impacts Section at https://planning.lacity.org/eir/Hollywood_CPU/Deir/files/4.10%20Land%20Use%20&%20Planning.pdf.

[4] See LAMC 12.22 at https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-6561

[5] See the City of LA's Zoning Code Manual and Commentary, Fourth Edition, at https://www.ladbs.org/docs/default-source/publications/information-bulletins/zoning-code/zoning-code-manual-and-commentary.pdf

intense than the office use before then. A SCEA is essentially similar to an MND as in the above-quoted case and must therefore be deemed inadequate.

For this reason, too, the SCEA is improper and inadequate as a matter of law, as it improperly piecemealed two phases of the same project and relied upon an inaccurate baseline to measure the Project's impacts against. This requires an EIR and an evaluation of the "whole of an action," and the cumulative effects of the prior Phase I and the present Phase II of the Project. (See also, *Arviv Enterprises, Inc. v. South Valley Area Planning Com.* (2002) 101 Cal.App.4th 1333, 1349–1350.)

II. THE PROJECT'S ENTITLEMENTS SHOULD NOT BE APPROVED AS THEY VIOLATE THE STATE LAWS AND CITY POLICIES

A. Incentives and Waivers Under State Density Bonus Law

The Project's requested numerous waivers and incentives under the density bonus law should not be granted. First, the Project has not shown it complied with the *replacement* requirement of the density bonus law, as discussed earlier. Second, the SCEA or the City's Staff Report/Recommendation for December 12, 2024 hearing on Agenda 8 ("**Staff Report**") does not show (provide any *factual* support) that the Project's sought waivers and incentives are warranted by law. And they are not warranted indeed.

- **Incentives:**

Thus, under the state density bonus law, incentives shall be granted to a qualifying housing development unless, based upon substantial evidence, the city finds that (a) the concession or incentive does not result in identifiable and actual cost reductions, consistent with subdivision (k), *supra*, to provide for affordable housing costs; or (b) concession or incentive would have a specific, adverse impact, as defined in paragraph 2 of subdivision (d) of Section 65589.5, upon public health and safety or the physical environment or on any real property that is listed in California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact without rendering the development unaffordable to low-income and moderate-income households, or (c) the concession or incentive would be contrary to state or federal law. Govt. Code §65195(d)(1)(A)-(C). Here, the Project will have specific adverse impacts on human beings, including students at nearby schools and residents nearby, as well as the historical resource on site. And there are no mitigation measures offered to mitigate the noted impacts.

Moreover, the Applicant far exceeds the number of incentives it is entitled to under the law. To wit, what is presented as a *single on-menu* incentive, is however, a *multitude* of incentives that are not warranted by the State Density Bonus Law or the referenced LAMC Sections 12.22-A,25(f)(8) and 12.22-A,25(g)(3). Moreover, the incentives are not even sought to *increase* the density on the site or to provide 20% of base units for affordable rates. The Project, in fact, provides *less* units (170 units) than the *base density* of **347** on the Project Site that the Staff Report mentions. (Staff Report, p. C-6.) As such, the claimed incentives are not to even remotely related to any "density bonus" as defined in state law, but are only a way to bypass numerous development rules.

- **Waivers:**

Per the CPC Agenda, Item 8, the Applicant is seeking two waivers to: (1) reduce a 11 feet side yard to zero; (2) to reduce separation between existing and new buildings. In addition, since the Project could qualify for only *three* incentives and since its *on-menu* incentive presents a *multitude* of incentives, those extra incentives are in fact waivers for, namely: "averaging of floor area, density, open space, and parking over the project site, and permit vehicular access from a less restrictive zone to a more restrictive zone." But the Applicant neither requested all of those waivers nor made the requisite showing of physical preclusion or hardship for those. Neither can it.

Thus, per the Govt. Code § 65915(e)(1) and LAMC Section 12.25-A,25(g), a Housing Development Project may also request other "waiver(s) or reduction(s) of *development standards* that will have the effect of *physically precluding* the construction of a development meeting the [affordable set-aside percentage] criteria…at the densities or with the concessions or incentives permitted under [State Density Bonus Law]."

In fact, a showing of *physical preclusion* for waivers under the State Density Bonus Law and LAMC here is akin to the required showing of *physical hardship* for variances and exceptions under the LAMC. But the Applicant does not meet the requirements of 5 findings needed for variances under LAMC or Charter Section 562, including that the physical hardship not be self-imposed and the waiver or variance not grant a special advantage to a particular Applicant. These requirements are also imposed by Cal. Const. Art. I § 7(b), which mandates: "(b) A citizen or class of citizens may not be granted privileges or immunities not granted on the same terms to all citizens."

Here, the Project will significantly and adversely affect disadvantaged communities nearby, including students at schools in close proximity to the Project site. The

Project's sought variances and waivers conflict with the General Plan's elements, including the policies of the Framework Element and the Plan for Healthy LA for environmental justice and disadvantaged communities. The Project will definitely affect the historical resource on site – the Morgan Camera Shop.

For all of these reasons, the Project's sought entitlements, including the Density Bonus waivers and incentives, should not be approved.

B. Conditional Use Permit and Site Plan Review.

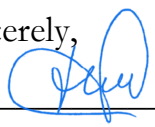
The Applicant is also seeking a conditional use permit to allow sale and dispensing of alcohol beverages for its 16,000 sf. of commercial space, pursuant to LAMC 12.24W.1. For all reasons stated in Sections I-II, *supra,* the Project does not meet the requirements for a conditional use permit, as it will detrimentally affect the nearby disadvantaged residential communities, schools, traffic, etc., and will create an undue concentration of alcohol establishments on the Project site, among other things.

For the same reasons, the Project does not meet the applicable LAMC Chapter 1A requirements of Section 13.B.2.2, which are additional to LAMC 12.24W.1. The Project seeks numerous deviations from the applicable height, FAR, setback, yard requirements, seeking to *average* the applicable requirements across the site despite developing only part of the Project site. There is a fair argument that these numerous deviations may be adverse to the disadvantaged communities, schools, and residential area around. In addition, the Project seeks a conditional use permit to sell alcohol. This will only exacerbate the hazards and impacts of the oversized Project.

III. CONCLUSION

In sum, WSRCC requests that the City require a local workforce, that the City impose training requirements for the Project's construction activities to prevent community spread of COVID-19 and other infectious diseases, and that the City prepare an EIR for the Project or, at the very least, revise and recirculate the SCEA to address the aforementioned concerns. If the City has any questions, please feel free to contact my Office.

Sincerely,



Naira Soghbatyan, Esq.
Attorney for Western States Regional Council of Carpenters

DAY OF HEARING SUBMISSIONS