



# FINAL ENVIRONMENTAL IMPACT REPORT

## HOLLYWOOD COMMUNITY PLAN AREA

Volume 11 of 17

Appendix A (continued)

### 8150 Sunset Boulevard Mixed Use Project

Case Number: ENV-2013-2552-EIR

State Clearinghouse Number: 2013091044

**Project Location:** 8150 W. Sunset Boulevard, Los Angeles, California, 90046

**Council District:** 4, David E. Ryu

**Project Description:** AG-SCH 8150 Sunset Boulevard Owner, L.P., (the “Applicant”) proposes development of the 8150 Sunset Boulevard Mixed Use Project (the “Project”). The Project consists of two buildings over a single podium structure with elements ranging in height from two stories to 16 stories, increasing to approximately 108 feet for the nine-story portion and approximately 191 feet for the 16-story portion of the building; the overall building height is approximately 216 feet as measured from the low point of the site to the top of the South Building. The North Building would include two levels with a rooftop terrace containing exclusively commercial uses. The South Building would contain commercial uses on the first two levels, residential uses on levels three through 15, and a rooftop restaurant/lounge on the top level. The project would include approximately 111,339 square feet of commercial retail and restaurant uses and one rooftop level, 249 apartment units, including 28 affordable housing units, representing approximately 222,564 gross square feet of residential space. The project would also provide a central public plaza, public space at the northeast corner of the site, public rooftop deck/garden areas, a private pool and pool deck area for residents, as well as other resident-only amenities totaling approximately 6,900 square feet. Parking for all proposed uses would be provided on-site via a seven-level parking structure housed within the podium structure that includes 849 total parking spaces (295 residential and 554 commercial). The total development would include approximately 333,903 square feet of commercial and residential space with a maximum floor-area ratio (FAR) of approximately 3:1.

**APPLICANT:**

AG-SCH 8150 Sunset Boulevard  
Owner, L.P.

**PREPARED BY:**

ESA PCR  
201 Santa Monica Blvd, #500  
Santa Monica, CA 90401

**ON BEHALF OF:**

The City of Los Angeles  
Department of City Planning  
Environmental Analysis Section

**MAY 2016**



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**LETTER B30**

Planning Environmental Review &lt;planning.envreview@lacity.org&gt;

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**City Case No. ENV-2013-2552-EIR**

2 messages

**GREGORY WIDEN** <gregorywiden@mac.com>

Sat, Nov 7, 2015 at 5:38 PM

To: planning.envreview@lacity.org

Cc: david.ryu@lacity.org, mayor.garcetti@lacity.org, renee.weitzer@lacity.org, cd4.issues@lacity.org, sarah.dusseault@lacity.org, julia.duncan@lacity.org, Michael.loGrande@lacity.org, Info@lamayor.org, Lhorvath@weho.org, Jheilman@weho.org, Lmeister@weho.org, Jdamico@weho.org, Jduran@weho.org, Slunceford@weho.org

Dear Srimal,

Attached are my comments and supporting documents on Alternative 9 on Behalf of Save Sunset Blvd in reference to City Case No. ENV-2013-2552-EIR. Thank you.

Gregory Widen

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**5 attachments****SSB FINAL LETTER nov1.pdf**  
2529K**ELDPNotice.pdf**  
2341K**Fire letter 2.pdf**  
14K**LAFD Letter 8150 Sunset .pdf**  
851K**WeHo DIER Letter .pdf**  
524K

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**Planning Environmental Review** <planning.envreview@lacity.org>

Sat, Nov 7, 2015 at 5:38 PM

To: gregorywiden@mac.com

Thank you for submitting your comments. They have been received and will be included in the administrative record for the Environmental Impact Report (EIR).

*This reply is automatically generated and this mailbox is only actively monitored during an EIR's public comment period. If you have specific questions or would like an immediate response, please contact the project planner identified on the notice directly.*

SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET



A COMMUNITY GROUP DEDICATED TO SCALED AND RESPONSIBLE NEIGHBORHOOD SERVING DEVELOPMENT.

Nov 7<sup>th</sup>, 2015

To the City of Los Angeles Planning Department, Mayor Garcetti, David Ryu, and  
Srimal Hewawitharana,

Environmental Analysis Section  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012-4801  
Attn: Ms. Srimal Hewawitharana

**In reference to City Case No. ENV-2013-2552-EIR**

Please enter the following comments on the Draft Environmental Impact Report (DEIR) for the proposed project at 8150 Sunset Boulevard in the City of Los Angeles, California into the public record, and address each one. These comments were also submitted on the previous DEIR comment period but the new Alternative 9 as reviewed has not answered any of these questions to our satisfaction.

Please also enter into the public record that Save Sunset Boulevard is a coalition of neighbors who are horrified at the size, scale, mass, traffic, shading, and geological consequences of this project on our historic neighborhood. This letter is added to the over 250 (at last count) letters from our neighbors that have been submitted against Alternative 9, as well as the over 700 letters submitted against the other alternatives during the last comment period.

# SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

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## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

### GENERAL NOTES AND COMMENTS:

The EIRs Executive Summary should lay out for the general public what is permissible under both the City's General Plan and the adopted Hollywood Community Plan of 1988 that is currently in force.

The EIR needs to be more accessible to the general public. The EIR consultants must evaluate each existing business side-by-side with each of the proposed new business uses in a chart or table. Specifically;

- What are parking requirements for each of the current land uses on site and for the proposed land uses based on floor area (square footage) and spaces allocated/required?
- What are the metrics for trips generated for each of the current land uses on site and for the proposed land uses, again with square footage, proposed patronage, and individual business or residential use related vehicle movements?
- These metrics should identify all the current commercial uses including Art Storage uses that are a substantial portion of the commercial uses currently.

If some of this information is already contained in the report please indicate where it is shown. If it is missing, please include this information in the revised draft.

The EIR completely fails to address three specific project alternatives that the community had asked to be included during the Consultant's initial scoping meetings. These were;

- Commercial only development up to the allowable 111,000sq ft
- Mixed use development up to the allowable 111,000sq ft (with the same commercial/residential ratio of the proposed project)
- Mixed use development with affordable housing bonus up to the allowable 111,000sq ft

Please objectively evaluate these project alternatives with respect to the parking requirements, traffic impacts, trip generations, considerations with or without affordable housing and construction-related impacts. Also would these project alternatives require that the applicant to request discretionary actions or variances in order to comply with the code?

Please have the Consultant evaluate each of these potential alternatives under the criteria for Environmentally Superior Alternatives.

Project Alternatives #3, #4, #5, #6 & #7 all involve development options that were NOT raised by the community during scoping process. There was no explanation as to why these were considered based on the public scoping process. Most if not all appear to non-code compliant options. Please disclose who generated these alternatives, and why they were considered as viable alternatives with respect to the General Plan or the Hollywood Community Plan considerations?

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

The DEIR (ref. Executive Summary, Page E5-10, paragraph 1) concludes that Alternatives # 4 and #5 are the environmentally superior alternatives. The Consultants should re-evaluate this conclusion as it is not supported in the Report and in fact only Alternative # 2 is identified as reducing one of the impacts. A careful study of the three alternatives that were suggested by the community during the scoping meeting will yield different results. Please consider the environmental superiority of these options and then re-address the current conclusions.

Section D of the Executive Summary does not list "Hydrology" and underground water impacts resulting from the proposed new concrete parking structure and building foundation walls. The project is being built on a thick alluvial fan that during El Nino years will still contain massive amounts of run-off from the hills, and is within 100ft of the recently confirmed fault line. The consequences of these very serious dangers must be addressed clearly in the EIR.

The DEIR states that the developer is asking for 249 units of residential. The Hollywood Community plan specifies a maximum for Med-High Density Units - 40-60 per acre. Then the 2.55 of Site Acres would allow them just 151 units. If you add a 35% density bonus that is 52.85 (53) units, for a total of 204 units. This is the actual maximum number units allowed under the Hollywood Community Plan (1988) in the case that the project would be granted a 3:1 FAR.

Where is the developer getting the density figures from? How did the developers come at their figures?

The DEIR does not conform to the Hollywood Community Plan (1988) or CEQA

The DEIR admits that the Lytton Center on the project site "was found conservatively eligible as a City of Los Angeles Historic Cultural Monument as a historical resource. Therefore the Project Site is considered a historical resource under section 15064.5(a) (2) of the CEQA Guidelines and the Project would have significant and unavoidable impacts in historical resources due to demolition of the Bank."

Pg 143 of Appendix C3, Historic Resource Appendix Report, 8150 SUNSET DEIR

"If a project would render an eligible historic resource ineligible, then there would be a significant adverse effect under CEQA"

Pg 143 of Appendix C3, Historic Resource Appendix Report, 8150 SUNSET DEIR

Here the DEIR admits that its plan has significant adverse effects under CEQA since by demolishing the Lytton center it renders an eligible historic resource ineligible. Also, the demolition plan is against the clear language of the Hollywood Community plan to encourage preservation as quoted below.

The Hollywood Community Plan serves to "encourage the preservation and enhancement of the varied and distinctive residential character of the community"

—pg.1, section 3

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

“There are twenty-nine known historical resources located in a ¼ mile radius of the project site” “eight historical resources are located within the visual viewshed or indirect impacts study area of the project site.”

Pg 143 of Appendix C3, Historic Resource Appendix Report, 8150 SUNSET DEIR

These 29 historical resources constitutes “varied and distinctive residential character”. The DEIR’s bare conclusions that the proposed project would have a less-than-significant impact on the existing character of the project site and vicinity and would not physically divide an established community is completely unsupported by the facts and obvious overwhelming impacts of building a glass and steel skyscraper of 216 ft tall in this modest Chateau, Spanish Colonial revival neighborhood of two to eight story buildings.

Context should be respected in the design of new buildings to be constructed near historic landmarks and in areas of established historical character. The new and old can stand next to one another with pleasing effects, but only if there is a similarity or successful transition in scale, building form and proportion. The detail, texture, color and materials of the old should be complemented by the new.

“Therefore the demolition of the mid twentieth century resources on the project site would not materially impact the historic setting” “because the setting of these resources have already been compromised.”

Pg 151 of Appendix C3, Historic Resource Appendix Report, 8150 SUNSET DEIR

Here the DEIR claims that because there are newer buildings in the area, demolition will have no impact. This reasoning is disingenuous at best. There are 3 properties bordering the property on the National Register of Historic Places. The United States Federal Government found these properties worthy of preservation even though they border newer properties, as should the applicant.

There is no discussion of the jarring visual impact of the proposed project. The project makes no attempt to “fit in” or to match the character of the neighborhood. Other principals and policies from the Hollywood General Plan should be discussed and reconciled with the project. The lack of any discussion and reference to the policies in the Hollywood General Plan makes the DEIR inadequate at best, and beyond the legal requirements at worst.

“Generally a project that follows the Secretary of the Interior’s standards for the treatment of historic properties guidelines for preserving, rebuilding, restoring, and reconstructing, historic buildings” “shall be considered as mitigated to the level of less than a significant impact on the historic resource.”

The DEIR goes on to say:

“Related to new construction will not destroy historic materials, features and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with historic materials features, size, scale, and proportion, and mass seeing to protect the integrity of the property and its environment.”

“The building is ‘generally compatible with the historic materials, features and massing of the adjacent buildings’.”

Appendix C3, Historic Resource Appendix Report, 8150 SUNSET DEIR.

Here the Appellant does not make a fair argument and no substantial evidence exists that proves it “Generally compatible”. The EIR is incomplete and inaccurate without specifics. Most of the Appellant’s assertions are purely speculative, with no proof in the record to substantiate these claims.

The DEIR violates its own standards even though it won’t admit it. The historic buildings surrounding the building site do not make use of Glass and Steel modern architecture. They are not 20+ stories high. They do not make use of 3:1 FAR and off menu Multi-Use zoning. The building proposed does change the spatial relationship of the block by creating a 216 foot tall neighborhood dividing block of a building, especially separating all the neighboring low rise buildings from the hills, and blocking out the view of the community from all the adjacent buildings on the hill. There is no discussion of how this violates the specific policies in the Hollywood Community Plan (1988) and provides only inaccurate and speculative assumptions of “no impact” or “less than significant impact”.

The DEIR should illustrate how it satisfies the laws objectives and policies in reaching its conclusions. Discussions of the violated policies should also be added to the DEIR to fully resolve the conclusions reached and how the facts and studies support the conclusions. The conclusions appear erroneous because the project appears to violate, at some level, nearly every aspect of the Hollywood General Plan and Policies. A full discussion in the DEIR of the policies and principals of the Hollywood General Plan and which are satisfied and which violated by the proposed project should be enumerated in the DEIR. The following principals and policies and objectives should be fully discussed in the DEIR: It is insufficient to simply state bare conclusions without a deeper discussion of the elements of the Hollywood Community Plan.

The established neighborhood character should also be respected. In some cases, formal height limits and other building controls may be required to assure that prevailing heights or building lines or the dominance of certain buildings and features will not be broken by new construction.

The Hollywood General plan mandates that we must:

**“protect lower density housing from the scatted intrusion of apartments”**  
pg.1, section 3

**“promote the preservation of views, natural character and topography of mountainous parts of the Community”**  
pg.1 section 7

And that;

SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET  
**“Transitional building heights should be imposed, especially in the Medium density housing designated area where this designation is immediately adjacent to properties designated Low Medium 1 or more restrictive”**  
pg 3

The immediate neighboring homes on Havenhurst Drive, some of which are not considered or specifically discussed in the DEIR, are between two and seven stories tall. Similarly, the conclusion that the proposed project would not conflict with an adopted land use plan or policy adopted for the purpose of avoiding or mitigating an environmental effect (The Hollywood Plan and its various Elements) is completely unsupported. The scale and mass of the project is Neighborhood Dividing and this is a major CEQA issue

“There are twenty-nine known historical resources located in a ¼ mile radius of the project site”

“eight historical resources are located within the visual viewshed or indirect impacts study area of the project site.”

Pg 143 of Appendix C3, Historic Resource Appendix Report, 8150 SUNSET DEIR

Of these twenty-nine historic buildings, the DEIR states that there is no impact, or no significant impact to any of them. The methodology for coming to this conclusion should be examined in detail, as it is not supported by the facts on the ground.



The DEIR is nearly devoid of any discussion of the potential impacts of a dramatic change in the zoning for one lot in a historic neighborhood. The DEIR inadequately discusses any of these important and directly applicable policies.

**On the left is the 2 story National Historic Register building, The Andalusia; directly across the street is the 8150 project site where the 20+ story building will shadow it.**



SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET



**The views of and from The Colonial House (right), another National Historic Register building, will be gone once a 216 ft tall skyscraper is built on the left hand portion of these photos.**

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET



**A Two Story building directly bordering the 8150 project site. The project proposes a seven story concrete parking structure within twelve feet of this modest neighboring building.**



**Below is an illustration of how completely out of scale the proposed 220 foot (NOW 234 FEET) building is with the 2-8 story context of the neighborhood.**

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

### ELDP

Where are the improvements mandated by ELDP? Does this project meet the threshold?

The ELDP states;

“The project creates high wage, highly skilled jobs that pay prevailing wages and living wages and provide construction jobs and permanent jobs for Californians” – page 15, appendix j, ELDP certification documents (City of LA Notice of Environmental Leadership Development Project)

The DEIR fails to state what type of high wage jobs it will be creating. The DEIR fails to certify that these will be new jobs and not just the high wage jobs that exist already in the 8150 site, particularly the jobs at Chase Bank currently in the Lytton building. The DEIR fails to adequately estimate the number of jobs being merely transferred from other parts of the community. Under ELDP the project must create high wage jobs, but the DEIR fails to subtract the amount of already existing, high wage jobs that already exist from operating to proposed tenants. Where are the specific figures for creating new jobs? Most importantly, can the people who work at the building afford to live at the building at current market rates?

THE DEIR fails to discuss in detail the wages and what type of jobs and what they will be paid. They said they would provide 300 jobs. Currently on site there is 217 jobs.

The DEIR fails to state the difference between creating and just transferring jobs.

The DEIR fails to state how many restaurant worker jobs will be created and if these are classified as high wage, highly skilled jobs.

The DEIR fails to state how many of these jobs part time or full time jobs.

The ELDP states that the project within ½ a mile of major, high quality transit stop. The nearest bus stop is on Fairfax. The DEIR misstates the nature of the transit stop Fairfax. The building is beyond the mandated 1500 feet of We have included pictures located on the subsequent pages

### **How does this project get the same streamlining as Apple's new campus?**

There are no solar panels because all the outside space is given to noise making activities that will destroy the community, and the building casts a massive shadow across a wide area, preventing the neighbors from going solar.

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

### ZONING, HEIGHT, DENSITY, AND TRANSIT

- Zoning: **C4-1D**
- FAR: **1:1** with "**D**" Height restriction
- Neighborhood Office Commercial - "**Neighborhood Commercial**"
- Regional Center or Neighborhood Center: **No**
- Mixed Use Boulevard: **No**
- TOD: **No**
- Alquist Priolo Earthquake Hazard Zone: **Yes**
- General Plan Framework - **City of Los Angeles**
- Community Plan: **Hollywood Community Plan 1988**
- Housing Element: **December 2013 City of Los Angeles**
- **Units per acre = 203 units**
- Med-High Density Units - 40-60 per acre @ 2.55 Acres = 151 units
- plus 35% density bonus 52.85 (53) units = **204 units** (Hollywood Community Plan 1988)
- Off Menu Requests: **Many**
- FAR Increase Request: **Yes**
- Air Rights Request: **Yes**
- Condo to Apartments: **?**

This area is not designated a "Regional Center", but the project is "infill" project. The City of Los Angeles can make tighter standards.. if they choose to do so.

It should be noted that pursuant to Senate Bill 743 ("SB 743"), recently passed by the California legislature, aesthetic and parking impacts of residential, mixed use residential, and employment center projects on infill sites within transit priority areas (such as the proposed Project) "shall not be considered significant impacts on the environment." However, SB 743 also states that local agencies may continue to set their own thresholds, including those for aesthetic impacts. As such, the analysis presented below evaluates aesthetics, views, light/glare, and shade/shadow impacts per the City of Los Angeles' local CEQA guidelines, which are contained in the Los Angeles CEQA Thresholds Guide, discussed below.

### APPLICANT TEXT

b. Regulatory Framework

(1) State of California – Senate Bill No. 743

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. The purpose of SB 743 is to streamline the review under CEQA for several categories of development projects including the development of infill projects in transit priority areas. The bill adds to the CEQA Statute, Chapter 2.7, Modernization of Transportation Analysis for Transit-Oriented Infill Projects, and in particular Section 21099. Pursuant to Section 21099(d)(1) "**Aesthetic and parking impacts of a residential, mixed-use residential, or**

**SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.”**

“Transit priority area” means an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.

“Major transit stop” is defined by PRC Section 21064.3 to mean a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

The Project Site is located within approximately 1,500 feet of the intersection of Sunset Boulevard and Fairfax Avenue, which is served by two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods, including Metro routes 2, 217, 302 and 780.

The proposed Project meets the criteria set forth in Section 21099(d), and for this reason, the proposed Project’s effects on aesthetics, including views, and lighting and glare are not required to be analyzed under the State CEQA Statute.

#### 4.A-11

Chapter 5 of the General Plan Framework applies to urban form and neighborhood design. “Urban form” refers to the general pattern of building heights and development intensity and the structural elements that define the City physically, such as natural features, transportation corridors, activity centers, and focal elements. “Neighborhood design” refers to the physical character of neighborhoods and communities within the City. With respect to neighborhood design, this chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service. The General Plan Framework also states that the livability of all neighborhoods would be improved by upgrading the quality of development and improving the quality of the public realm. **Urban form policies applicable to the Project Site include Objective 5.8, which applies to neighborhood districts and community districts.** This objective is to reinforce and encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.

General Plan Framework Chapter 6, Open Space and Conservation, addresses outdoor recreation needs of the City’s residents. Objective 6.4 applies to the provision of usable open space and maximizing the use of public open space resources through private development.

#### 4.A-15 PAGE

##### b. Thresholds of Significance

##### (1) Visual Character and Aesthetics

##### (a) Appendix G to the State CEQA Guidelines

Appendix G of the State CEQA Guidelines provides sample questions for use in an Initial Study to determine a project’s potential for environmental impacts. According to the sample questions included in Appendix G under Section I, Aesthetics, a project would have a potentially significant aesthetic impact if it would:



## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

- a. Have a substantial adverse effect on a scenic vista; or
- b. Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway; or
- c. Substantially degrade the existing visual character or quality of the site and its surroundings.



Existing View



Proposed View

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET



Proposed View

The DEIR for 8150 Sunset Blvd Project fails to provide information and or detail on many important transit and street improvements related to construction and general after construction operations. The project proposes very reduced vehicle parking with high use of limited close by transit, use of bikes and walking for the majority of users without needed improvements needed for operation

The project site, 8150 Sunset Blvd at Crescent Heights is not located in a regional center, mixed use boulevard, or center or such designated by the City of Los Angeles or Hollywood Community Plan. The project site is not an employment hub, or considered an entertainment center area. That is designated as such east of La Brea. The project site does not fit the common "transit oriented development" definition as the site is located almost two (2) miles from major rail transit - Red Line. While there is a local bus stops on Sunset Blvd, Laurel Canyon and Fairfax Ave has a local rapid bus stops at, this bus is constantly detoured due to numerous Hollywood Blvd street closures. The current local bus stop locations and sidewalks can not support or accommodate high volume transit riders without significant improvements to all bus-transit stop locations within the project vicinity.

- Intersections and street in the area surrounding the project site in the City of Los Angeles and City of West Hollywood are already operating a Fail during peak hours and beyond.
- Sunset Blvd, Crescent Heights and Laurel Canyon around the project site have No bike lanes now or planned. The sidewalks are narrow and not able to support bike riding. Therefore it would be expected that travel to and from the project site from the immediate neighboring hillsides and surrounding areas will be by car at all times of operation, especially during later night time hours..

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

- The projects proposed height, size, density, design and proposed high volume use is incompatible with the neighborhood character and infrastructure capabilities.
- The projects proposed high volume commercial activity and late night use will have overwhelming and permanent negative impact on the surrounding community and daily commuter travelers on Laurel Canyon, Crescent Heights, Sunset Blvd and Fountain Ave.

The projects proposed height, size, density, design and proposed high volume use is incompatible with the neighborhood character and infrastructure capabilities. It proposes a high volume of commercial activity and late night use which will have overwhelming and permanent negative impact on the surrounding community and commuters on Laurel Canyon, Crescent Heights, Sunset Blvd and Fountain Ave.

The EIR fails to provide a complete description of the existing building uses on the site. The floor areas and parking counts currently allocated to each use, and to the proposed uses must be shown. This information should be in the "Master Land Use Application" online on the City's website link for this project.

The EIR fails to mention that the zoning was changed/downsized from 3:1 FAR to 1:1 FAR ("Q Condition") over a period of years, and that this was compliant and in accordance with the currently in use Hollywood Community Plan. For correct public and legal consideration, the EIR must show the reason the FAR was downsized.

Also please justify permitting a development with a height of 220 feet (NOW 234 FEET) on this site without a variance from Code Section SEC. 12.22.A.25.f.5 Specifically: (5) Height. A percentage increase in the height requirement in feet equal to the percentage of Density Bonus for which the Housing Development Project is eligible. This percentage increase in height shall be applicable over the entire parcel regardless of the number of underlying height limits. For purposes of this subparagraph, Section 12.21.1 A.10. of this Code shall not apply.

(i) In any zone in which the height or number of stories is limited, this height increase shall permit a maximum of eleven additional feet or one additional story, whichever is lower, to provide the Restricted Affordable Units.

## **New Residential Units**

249 units for 505-528 new residents where there are currently none. The project plans or DEIR does not include or address onsite or local parks and necessities or amenities for children, seniors or pets that will live at the project site;

- What amenities and recreation play areas will be provided for children and where?
- What amenities and recreation area will be provided for seniors and where?
- What is the proposed rents for market rate and low income units?
- What amenities will be provided for the residents pets?



## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

- Where will residents walk their dogs or pets, on Sunset Blvd and Crescent Heights?
- Residents can rent additional parking spaces from where - the commercial parking or off site? What cost?
- Most project open space is proposed for entertainment and commercial type use. Where are the studies for noise pollution of these events? Where will the overflow parking be located for these events?
- What school or child care amenities will be provided?
- Will each apartment have a full sized parking stall?
- Will each apartment have a second parking stall?
- Where will residents guests park?
- Where is the commercial parking, on site or off site?
- What is the parking cost?

## PARKS AND GREEN OPEN SPACE

The project site the Havenhurst Park as a local park to be used by residents. However Havenhurst Park is a Very small immediate resident serving pocket park, open from 9am to dusk and located in the City of West Hollywood. Hardly a major park, not even a small size park. The DEIR does not identify any other public open space or park space they would contribute to the existing community or that their residents would be using. Nor does the DEIR identify any contributions to editing parks and open space.

EIR applicant text:

The Project Site is also located within a quarter-mile of open space/park uses at Havenhurst Park. Pocket park images below.



## **SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET COMMERCIAL USE AND JOBS**

The EIR proposes 111,000 square feet of new restaurants and commercial use with hundreds of permanent highly skilled, high paying jobs in addition to construction jobs.

However the DEIR fails to provide information or detail regarding;

- The project projects net 94 new jobs over what the existing mall provided.
- Will the jobs be lower wage par-time restaurant and gym type jobs?
- Will jobs be local hire?
- What is the proposed average wage for the projects jobs?
- What family friendly restaurants and neighborhood serving retail is proposed?
- All restaurants are proposed to serve a full line of alcoholic beverages and remain open until 2am. This is neither neighborhood serving nor "family friendly".
- Will the average employee wage support being able to afford the projects market rate residential units on site?

## **TRAFFIC**

The figures and metrics used to show traffic increases are laughably innacurate. Our traffic consultant, Allyn Rikin, a former Bureau Chief of the LA DOT Planning Bureau, has calculated that the real figure for New Vehicle Trips generated by the project as it is proposed will be 11,693 using the I.T.E Trips Generation Manual, 9th Ed, Vol 6.

The absurdly inaccurate analysis in the EIR must be redone and recirculated. It goes without saying that since these figures are so flawed that the figures used for parking, both in the structure and its massive neighborhood destroying overflow, must also be recalculated and recirculated.

The DEIR for 8150 Sunset Blvd Project fails to provide information and or detail on many important transit and street improvements related to construction and general after construction operations. The project proposes very reduced vehicle parking with high use of limited close by transit, use of bikes and walking for the majority or users without needed improvements needed for operation

The project site, 8150 Sunset Blvd at Crescent Heights is not located in a regional center, on a mixed use boulevard, or center or such as designated by the City of Los Angeles or the Hollywood Community Plan. The project site is not an employment hub, or considered an entertainment center area. That designation is only to the east of La Brea.

The project site does not fit the common "transit oriented development" definition as the site is located almost two (2) miles from any rail transit (Red Line). While there is a local bus stop on Sunset Blvd for Laurel Canyon only Fairfax Ave has a local and rapid bus stops, but simple post in the pavement can not be described as a "regional transport hub" and it lies beyond the mandated 1500 feet from the development. That bus is also constantly detoured due to numerous Hollywood

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET Boulevard closures.

The current local bus stop locations and sidewalks can not support or accommodate high volume transit riders without significant improvements to all bus-transit stop locations within the project vicinity.

Intersections and streets in the area surrounding the project site in the City of Los Angeles and City of West Hollywood are already operating a “Fail” during peak hours and beyond.

The EIR is asking for ‘Green Bonuses’ for providing parking for over 1,000 bicycles. With each space taking 6 sq ft, that’s is a total of 6,000 square feet of encouraging the use of bicycles. However the EIR fails to recognize the unsuitability of the area for cyclists. The junction of Sunset Boulevard, Crescent Heights and Laurel Canyon is already one of the most dangerous in the City of LA, and has had several bicycle fatalities in recent years.

Despite this inherent danger of the main rounds and unsuitability of the steep hillside terrains narrow and already overcrowded streets, the EIR fails to make any mention of bike lanes being proposed or planned. The sidewalks are narrow and not able to support bike riding. Therefore it would be expected that travel to and from the project site from the immediate neighboring hillsides and surrounding areas will be by car at all times of operation, especially during later night time hours.

- Intersections and street in the area surrounding the project site in the City of Los Angeles and City of West Hollywood are already operating a Fail during peak hours and beyond.
- Sunset Blvd, Crescent Heights and Laurel Canyon around the project site have No bike lanes now or planned. The sidewalks are narrow and not able to support bike riding. Therefore it would be expected that travel to and from the project site from the immediate neighboring hillsides and surrounding areas will be by car at all times of operation, especially during later night time hours..
- The projects proposed height, size, density, design and proposed high volume use is incompatible with the neighborhood character and infrastructure capabilities.
- The projects proposed high volume commercial activity and late night use will have overwhelming and permanent negative impact on the surrounding community and daily commuter travelers on Laurel Canyon, Crescent Heights, Sunset Blvd and Fountain Ave.

This must be suitably addressed and circulated in the final EIR.

## RESIDENT AND GUEST PARKING

### Resident Parking.

- Residential Units 249 for 505-528 residents = 210
- 233 resident will Not have parking
- Studio 73 units = 73 vehicle parking spaces
- One Bedroom = 130 vehicle parking spaces
- Two Bedroom = 76 vehicle parking spaces
- Three Bedroom = 16 vehicle parking spaces

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• **Total Resident Vehicle Parking Spaces = 295**

### Resident & Guest Parking

- **505-528 new residents where there are currently none.**
- 528 new residents minus (-) 295 resident / guest parking spaces =
- **233 residents with No on-site parking**
- Guest Parking = ? (zero)

The project assumes that 210 to 233 residents will not have a car, but will walk, ride a bike or take the bus. What about the Guests of the residents?

- One onsite parking space per Studio and One Bedroom - additional or second resident vehicle parking space would be available for rented or purchased.
- Where would the additional rented vehicle parking space come from - the commercial parking or off site?
- What will be the weekly or monthly charge to residents for a second or additional vehicle parking space on-site?
- What will be parking charges be for those in the affordable housing units?

These figures are completely out of step with all the City studies on parking. The consequence of the parking overflow in such a busy area will be massive and neighborhood destroying congestion and pollution. For the community to take the EIR seriously this must be addressed in a serious, sensible and realistic manner.

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

### PARKING FOR RESTAURANT, EMPLOYEE AND RETAIL PATRONS

Commercial & Employee Shared Parking, 617 vehicle parking spaces further Reduced = **494 shared vehicle parking spaces**. 123 additional vehicle parking spaces were replaced with 380 more bike parking spaces.

- The projects DEIR and study assumes that more than half of residents, guests, employees and patrons **will not** have a car, but will ride a bike.
- The projects DEIR and study assumes that approximately **689** employees and patrons **will not** have a car, but will walk, ride a bike or take the bus.
- There are No bike paths or bike lanes now or proposed in the project plans. Due to the high volume vehicle traffic, safe, protected bike lanes for adults and children, with designated bike access from all surrounding streets to and from project site must be included for Sunset Blvd, Crescent Heights, Laurel Canyon, Fountain Ave and Havenhurst Dr.
- The DEIR fails to provide an adequate layout map of the parking. How many spaces will be tandem?
- The DEIR fails to provide an adequate community benefit to parking spaces being taken out on the sunset side of their property and being replaced by a taxi line. How does this benefit the community?
- The DEIR fails to address the traffic impact of a permanent taxi line on Sunset Blvd.
- Taxi line up on SUNSET Blvd, will take over the 3rd lane on sunset at havenhurst, there is no mention in the DEIR of the impact to traffic traveling east on sunset or residents trying to exit the building from Havenhurst on to Sunset.

The EIR assumes that more than half of residents, guests, employees and patrons of this 'high income destination' will not have a car, but will ride a bike. How this completely unrealistic figure arrived at and justified?

The EIR also assumes that approximately 689 employees and patrons of this 'high income destination' will not have a car, but will walk, ride a bike or take the bus. This is completely unrealistic and must be suitably addressed and circulated in the final EIR.

### Bicycle Parking - Resident-Guest-Patron-Employee Parking

Bicycle parking space was further Increased by 380, by reducing 123 commercial vehicle parking spaces; On-site, mostly short term bike parking: **1,365 bike parking spaces** The DEIR fails to provide detail on bike parking:

- Where is short term bike parking?
- Will exterior bike parking be covered and lighted?
- Will bike parking areas provide 24 hours security?
- Will there be a fee or charge for long term or short term bike parking?
- Why is the charge of fee for all bike parking?

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

- Will shower and lockers be available to all employees?
- Will shower and lockers be available to all patrons?
- What times of the day will showers and lockers be open and available?
- Will there be a charge (fee) for use of showers and lockers?
- Will there be valet bike parking and at what charge?
- There are no bike paths or bike lanes now, or proposed in the project plans. Due to the high volume motorized traffic, putting 1,000+ cyclists in the dense and dangerous traffic on Sunset Blvd, Crescent Heights, Laurel Canyon, even Fountain Ave and Havenhurst Dr without protected bike lanes for adults and children, is a public safety debacle. This must be suitably addressed and circulated in the final EIR.
- Designated bike access from all surrounding streets to and from project site must be included for, but the current layout of these streets makes this an impossibility. This must be suitably addressed and circulated in the final EIR.

## Parking Charge-Valet Charge

The project states that all parking will be by Valet only. The DEIR does not provide details regarding the fees and charges for parking;

- Resident may rent or purchase an additional vehicle parking space. What would the weekly or monthly fee per space?
- What is the cost or charge to park and Valet parking? Long term - Short term
- Is self parking option provided?
- Will guests of residents be charged for parking or free parking? What cost?
- Will employees be charged to park ? What cost?
- Will transit passes and discounts will be offered; What type - How many ? What cost - for how many years? For residents, employees, patrons, guests?
- The developer tried out the pay parking at this location charging \$3 for 15 minutes to park. It Failed. Will the developer be charging these rates again?
- The project is proposing 100% valet. Does this apply to the low-income units as well? How will they pay for this service or will the other residents subsidize this cost in their charges?
- Please evaluate the street parking available in the area. Will there be conditions that can be applied to ensure no impacts to the adjacent streets? The site is currently self-parked with free parking. Please evaluate in the Report whether free, self-parked vehicles will help mitigate impacts on the adjacent streets.

## Vanpool & Carpool

The project states that multiple van pool, ride home and car pool options will be available. The DEIR does not provide further information or operational detail of this proposal;

- Will these ride options be provided by the project or individual establishments ?
- Van pool and ride share will be to and from where pick up - drop off ?

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

- What times and frequency will this service be available?
- Will all ride share and ride home options be available daily, day & late night service and what charge / fee?
- Will the "Van Pool" service be available for residents, guests, employees and patrons?
- Three or more per car will be offered parking discounts-what discounts?
- How will that be available, to who and at what cost ?
- The project requests 80% vehicles spaces to be Compact cars
- How many free parking spaces?
- What is the charge for Valet?
- Will valet charge increase at night or evening hours
- Will parking be validated by on site commercial establishments - How many minutes at what charge?
- Handicap parking - free?
- Electric car spaces w/ plug in. How many - How many hours to charge - Discounts for?
- What protections to existing neighborhood residents will the project provide?

### "Sunset Stripmall Owner Sued by Tenants Over Parking Fees | WEHOville

<http://www.wehoville.com/2013/04/17/sunset-stripmall-owner-sued-by-tenants-over-parking-fees/>

“Charging for parking is standard practice in Los Angeles, and most certainly in high demand areas like the Sunset Strip,” said the landlord, referred to as “AG-SCH 8150 Sunset.” “The plain language of each lease allows the landlord to charge for parking within the shopping center at rates that it determines are appropriate.”

## VEHICLE TRAFFIC & CIRCULATION

### APPLICANT TEXT:

**Fountain Avenue** is designated as a Secondary or Modified Secondary Highway within the City of Los Angeles and as a Collector Street within the City of West Hollywood. Within the study area, Fountain Avenue is typically striped to provide for two travel lanes in each direction, with left-turn lanes provided at key intersections, and limited on-street parking is permitted. However, along its western segments (generally between Havenhurst Drive and La Cienega Boulevard), on-street parking is allowed along the south side of the street throughout much of the day, **reducing eastbound travel to one lane**, with the exception of during the afternoon peak period, when such parking is prohibited, thereby allowing for a second eastbound lane.

### CORRECTION

Fountain Ave is a Collector Street throughout the project study area, from La Cienega to La Brea and solely the City of West Hollywood. Fountain Ave as a "Modified" Secondary Highway within the City of Los Angeles starts at La Brea to the east. However, "modified" street standards as specified as part of the 2012 Hollywood Community Plan Update (HCPU) were terminated with the Superior Court Order to set aside the HCPU and therefore no longer in effect of all and any "modified" streets surrounding the project site. these streets include; Crescent Heights, Laurel Canyon, Hollywood Blvd, Fairfax Ave and Fountain Ave.

### COMMENT

- Streets surrounding the project site should not have been studied as "modified" street standards for the project's traffic study.

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

**The project proposes to use and incorporate the City of Los Angeles owned traffic island, street and right turn lane as part of their project.**

The DEIR fails to provide information and detail on;

- Removal of the City owned traffic island, street and right turn would cause irreversible and severe negative impact on traffic for the entire surrounding area forever. This proposed change should be eliminated from the proposed project plan.
- The lasting, negative effects of eliminating the City owned traffic island, City street and dedicated right turn lane and moving the Metro bus stop.
- The DEIR also fails to provide information and detail as to how the new increase in vehicle traffic, traffic flow, transit riders, pedestrians and bike riders would safely co-exists and move to and from the project site and throughout the neighborhoods and community.
- The current City of Los Angeles owned traffic island and function should remain and be improved to accommodate the new increase in transit user volume, pedestrians and bike riders. Traffic Island should not be incorporated into the project.
- Fire engine, police, ambulance and large truck would make the right turn how?
- Elimination of the traffic island would prevent, or at minimum, severely limit Metro and the City of Los Angeles from any future enhancements and additions of new transit service. Any future or new transit service that would require the right or left turn at Sunset Blvd and Crescent Heights would no longer be an option for the City or Metro.
- Elimination of the traffic island and current dedicated-sweeping right turn would make very dangerous conditions for vehicles attempting to make the right turn onto Crescent Heights and also vehicles turning left onto Sunset from Crescent Heights left.
- Pedestrians and bike rider safety would be at risk.

### **APPLICANT TEXT:**

**Approximately 60 percent of the Project's residential component inbound traffic is anticipated to enter the Project Site's Havenhurst Drive driveway from the south (via Fountain Avenue), with about one-half of this traffic (30 percent) turning onto Havenhurst Drive from both eastbound and westbound Fountain Avenue.**



## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET **COMMENT**

### **The project proposes a signal light at Fountain Ave at Havenhurst Dr to mitigate traffic.**

The DEIR traffic study fails to provide detail regarding severe negative impacts due to vehicle back up on Fountain Ave;

- A dedicated left turn lane for eastbound vehicle travel on Fountain Ave would be required to accommodate the project's anticipated hundreds of new resident vehicles turning left (north) onto Havenhurst Dr. to access the project site. The absence of a dedicated left turn lane would cause extreme back up on Fountain Ave to the west, especially during hours of the day when only one vehicle travel lane is available for eastbound traffic. This in addition to peak hours.
- Fountain Ave; Necessity of dedicated eastbound left turn lane at Havenhurst Dr. is not included in traffic study.

### **The project proposes to mitigate pedestrian and bike safety by prohibiting left turn from Crescent Heights into the project site.**

However the DEIR fails to provide information on how this would affect traffic and circulation into and out of the project site;

- What type of left turn "blocking" measure would be added to Crescent Heights?
- How these added measures would impact regular high volume traffic flow?
- How Crescent Heights northbound vehicles and bikes will access the project site parking area and valet drop off area?

### **The project proposes the use of the current Crescent Heights street vehicle travel "merge" lane for their valet parking drop off and queuing.**

However the DEIR fails to address or provide detail regarding safety issues;

- Valets in the street.
- Drivers exiting their vehicles along Crescent Heights.
- Mitigation and "blocking" measures that would prohibit U-Turns into the valet drop-off area from vehicles traveling from the north (Crescent Heights) turning into the valet drop off area.
- Access proposed valet queuing area from Sunset Blvd, around traffic island?
- Increase traffic making right hand turn on to Crescent Heights from Sunset Blvd
- Emergency service right turn and parking - Fire, Police, Ambulance
- Vehicle merge from Crescent Heights into on coming traffic

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

### APPLICANT TEXT:

**All of the Project's residential component trips must** exit from the Havenhurst Drive driveway<sup>14</sup> toward the north; approximately 10 percent of the Project's residential trips exiting the Havenhurst Drive driveway **are expected to utilize an "around the block" route to access Fountain Avenue, turning right from Havenhurst Drive onto eastbound Sunset Boulevard, and then turning right again onto southbound Crescent Heights Boulevard** before continuing along westbound Fountain Avenue.

### COMMENTS CONTINUED

- The project proposes to eliminate the current traffic island, bus stop and traffic lights and streets lights.
- The project proposes to eliminate the current dedicated right turn lane form eastbound Sunset Blvd to southbound Crescent Heights.
- The project also proposes moving the bus stop further east away from the project site.
- The project also proposes the addition of 1,365 bicycles and new bike riders in addition to pedestrians.
- All residential vehicles must exit Havenhurst and travel north to Sunset Blvd. the vehicles that don't turn west on Sunset Blvd would have to turn east on Sunset Blvd, then **TURN RIGHT** around the tip of the traffic island (project's plaza) onto Crescent Heights in order to access Fountain Ave or travel south on Crescent Heights.
- Vehicles making the right turn from Sunset Blvd to Crescent Height would be hundred to thousands daily from residents, employees and vehicles to the valet drop off
- Right turns around the the traffic island from new residents and vehicles using the project's Valet drop off on Crescent Heights would cause tremendous traffic back up on Sunset Blvd as right turning vehicles wait for pedestrians and bike to cross Crescent Heights at Sunset Blvd.
- It is anticipated that hundreds to thousands of passenger vehicles along with large delivery trucks and emergency vehicles would be attempting to make this right turn daily.
- Trucks and larger vehicles, including Fire Trucks would be forced into opposing traffic lane when attempting to make this very tight and unsafe right turn.
- Would impede already heavy traffic flow eastbound on Sunset Blvd, especially duty very heavy PM peak hours

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

- Add hundreds more vehicles to a heavy trafficked intersection that already operates at "E" to "F".
- It makes No Sense in regard to traffic, traffic flow, turn capabilities and vehicle, pedestrian or bike safety to remove the current dedicated turn lane and traffic island. Especially with pedestrians, bike riders and bus-transit riders crossing the street at Crescent Heights to access and leave the project site.
- This is not safe or good practice. Moving the bus stop farther away from the project site, forcing transit riders to walk back and cross Crescent Heights is ridiculous.

### APPLICANT TEXT:

Project component traffic is anticipated to travel to and from the Project Site along Fountain Avenue east of Crescent Heights Boulevard. **The Project's residential component is estimated to generate a total of approximately 1,564 net daily trips**, and therefore, would result in approximately **469 (northbound only) daily trips on the segment of Havenhurst Drive between the Project Site and Fountain Avenue**), as well as a total of approximately **314 new trips per day on Fountain Avenue west of Havenhurst Drive, a total of approximately 313 new trips per day on Fountain Avenue between Havenhurst Drive and Crescent Heights Boulevard**, and a total of approximately 78 new daily trips per day on Fountain Avenue east of Crescent Heights Boulevard.

Therefore, the Project's combined retail/commercial and residential components are estimated to add approximately 469 new (northbound only) trips per day to Havenhurst Drive south of the Project Site, along with approximately 654 new daily trips on Fountain Avenue west of Havenhurst Drive, a total of approximately **653 new daily trips on Fountain Avenue between Havenhurst Drive and Crescent Heights Boulevard, and a total of approximately 418 new trips per day on Fountain Avenue east of Crescent Heights Boulevard**.

Table 4.J-5, Local/Residential Street Traffic Impact Analysis Summary, **it is recommended that the entry-only loading dock driveway on Havenhurst Drive be restricted to southbound left-turn moves only (requiring all trucks accessing the loading docks to enter via Havenhurst Drive from Sunset Boulevard)**. The trucks would then exit the Project Site from the exclusive truck driveway on Crescent Heights Boulevard immediately south of the Project's main Crescent Heights Boulevard driveway. Since most truck delivery traffic is expected to occur during off-peak periods when Project-related traffic (as well as traffic on Crescent Heights Boulevard) is reduced, the potential for conflicts with Project patron-related vehicles turning right out of the Crescent Heights Boulevard driveway are anticipated to be minimal. Therefore, **no turn restrictions at this truck exit driveway are considered to be necessary**.

## COMMENTS CONTINUED

The project proposes all patron and employee vehicles, delivery trucks and service trucks will exit onto Crescent Heights turning left to Sunset Blvd and

**SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET right turns to Fountains Ave.** However the DEIR fails to address and provide information and detail regarding realistic traffic operations;

- Left turn vehicle safety issues
- Right turn vehicle safety issues
- Obstruction of current traffic flow
- Safety and traffic flow measures for turning vehicles and on coming traffic
- Vehicle merge and or waiting area operation
- Vehicle back up from cars attempting exit project site to cross Crescent Heights and turn left toward Sunset Blvd
- Vehicle attempting exit project site to cross and Crescent Heights and merge across lanes of traffic to turn right-west bound on Sunset Blvd
- Pedestrian and bike safety while mixing with hundreds of vehicles exiting the project site on Crescent Heights

### **BIKE LANES and BIKE PARKING**

The project proposes a further reduction in vehicle parking by 123 vehicle parking spaces to 494 vehicle parking spaces and further increase of 380 short term bike parking to 1,365 short term bike parking spaces for employees and patrons. Further the project states the future studies for possible bike paths were suggested as part of a study farther east from the project site - Fairfax, Hollywood and Sunset Blvd.

However, With no bike paths or safe access for bikes provided at, around or surrounding the project site the DEIR fails to provide information or detail as to how the surrounding streets and sidewalks will accommodate 1,365 bike riders. Further the DEIR does not provide information or detail on future bike paths and which streets would accommodate safe bike travel and or exactly which street and how many surrounding streets would lose a vehicle travel lane for bike travel. Sunset Blvd, Crescent Heights, Laurel Canyon, Fairfax Ave, Hollywood Blvd ?

The DEIR fails to provide information and operation detail;

**The project state that bikes lane and bike paths are being "studied" for future application, however the DEIR fails to provide information or detail on:**

- The time horizon of the study. Five years, ten years, never?
- If in fact bike paths and bike lanes are planned and installed for the area immediately surrounding the project site and when. five years, ten years ?
- Who will be conducting the study and installation of the bike paths and bike lanes
- What streets the bike paths and bike lanes would be installed on? Sunset Blvd, Laurel Canyon, Crescent Heights, Hollywood Blvd, Havenhurst, Fountain Ave?
- Which and how many vehicle travel lanes will be removed to accommodate the new bike paths and bike lanes
- What is the location and safe bike path and passage that will feed directly into and out of the project site

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

- Will bike riders be expected to share the sidewalk with pedestrians?
- Will bike paths be actual protected bike paths and bike lanes or minimal non safety sharrows?
- Which streets surrounding the project site are proposed to have or will have bike paths?
- How many vehicle travel lanes and what length of the street will be lost on each street to apply new bike paths
- How will bike riders, including children bike riders safely access the project site and bike parking?
- Will bike parking be sheltered and lighted?
- Who will have use of showers and lockers; General public, patrons, employees?
- What constitutes "long term" and "short term" bike parking? Minutes, hours or days of parking use?
- Will a security guard be stationed at bike parking area all the time?
- Will the project be building bike paths surrounding the project site?

## TRANSIT, CIRCULATION, IMPROVEMENTS

Local Bus Stop: **Yes**

Transit Stop: **Sunset and Fairfax**

Proposed Improvements to Transit and Transit Bus Stop: **None**

Bus Stop: **?**

Dash Bus: **No**

Bike Lanes / Bike Path: **No**

Proposed Bike Lanes / Paths: **No**

Bike Access to Project Site: **None**

Bike Lane Improvements: **None**

### APPLICANT TEXT:

(d) Public Transit

As discussed above under Project Characteristics, **the existing Metro bus stop at the southwest corner of Sunset Boulevard and Crescent Heights Boulevard would be relocated to a new location east of Crescent Heights Boulevard as part of the Project. The new bus stop would still be located on the south side of Sunset Boulevard, approximately 400 feet east of its current location, and would continue to provide public transit service.** The bus stop relocation would be completed prior to initiation of Project construction activities in order to ensure that uninterrupted transit service is provided throughout Project implementation. As such, no adverse impacts to public transit service associated with the relocation of the existing Metro bus stop would occur.

**It is estimated that approximately 240 of the Project's retail/commercial daily trips would occur via the public transit services in the Project vicinity.** Using an AVO factor of 1.2 to convert these vehicle trips to person trips, **the Project's retail/commercial component could result in an increase in bus ridership of approximately 288 persons per day**

**In addition, it is estimated that approximately 156 of the Project's total daily residential trips could actually occur via the area transit facilities** rather than in privately-owned vehicles.

**SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET**  
Using the AVO factor of 1.2 persons per vehicle, the Project's residential component could result in a potential increase in area transit ridership of approximately 187 persons per day.  
While it is acknowledged that bus utilization in the Project vicinity can be heavy during the peak weekday commute periods, this nominal level of new rider demand would likely be divided among the three bus lines (Metro Lines 2/302, and Metro Line 218) providing direct service to the Project Site.

## **COMMENT**

**Only local bus service is available!** The project site is more than 1-1/2 miles from the closest rail line Hollywood & Highland-Red Line.

### **Metro Red Line**

- 1.9 miles away or farther, not comfortable walking distance

**The project states Dash Bus Service is an available available to the project site.** However, the project must have used old and outdated information from the 2012 Hollywood Community Plan Update; The DEIR is not accurate in this transit information.

## **CORRECTION**

- There is No Dash Bus service in the area. Hollywood-West Hollywood Dash Bus was eliminated in 2010 and never reinstated.



## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

**The project states additional bus lines farther east to service the project site.** The DEIR does not address the Metro Bus detours due to numerous street and lane closures on Hollywood Blvd. Bus riders must wait and transfer or walk the extra 1/2 mile to the nearest rail Red line at Hollywood & Highland.

Metro Service Changes | December 2013 Service Changes and Detours

<b>217</b>	Hollywood/Vine Station -- Howard Hughes Ctr via Hollywood Bl -- Fairfax Av - La Cienega Bl	Establish regular detour route from Hollywood Bl/Highland Av via Highland Av, Sunset Bl to Fairfax Av on frequent days when Hollywood Bl is closed for special events.
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<b>780</b>	Metro Rapid - Washington/Fairfax - Pasadena via Fairfax Av & Hollywood & Colorado Bl	12/15/13
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Monday through Friday  
Effective Dec 14, 2014

**780**

### Saturday, Sunday and Holiday Schedules

No service on Saturday, Sunday, New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day.

## COMMENT

- Metro bus lines 2 / 302 and 218 are located on Sunset Blvd and Crescent Heights - Improvements to sidewalks, bus stop upgrades to waiting areas will be necessary in order to accommodate the hundreds of anticipated new bus riders, pedestrians and bike riders that will all share the sidewalk.

### Re-location of Bus Stop

The project proposes the relocation of the local eastbound Sunset Blvd bus to 8000 Sunset during construction. However for operation function of 8150 Sunset Blvd this location would not be feasible, safe or practical.

The DEIR fails to provide information and detail for future operations, including improvements that will be provided as part of the project to bus stops, transit, transit safety, transit accommodation during, after and for the future.

## **SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET**

- The proposed location and sidewalk could not accommodate the projects anticipated Hundreds of transit riders due to the narrow sidewalk. Nor could
- The current sidewalk could not accommodate bus shelters and benches, pedestrians, bike riders and probably not American Disabilities Act (ADA) compliant.
- Would not accommodate pedestrians and bus riders and bicycles
- Relocation of the eastbound Sunset Blvd bus would force riders to pass the project site, then walk back down a narrow sidewalk and have to cross Crescent Heights to access the project site.
- Relocation of the eastbound Sunset Blvd bus would also contribute to vehicle back up on Sunset Blvd, as right turning vehicles will have to wait for pedestrians and bike riders to cross the street.
- Relocation the local bus stop to the east side of Sunset Blvd would cause a traffic hazard, due to the north-east turn lane. Cars might not be able to merge prior to rear ending the bus.
- A stopped bus would cause a vehicle traffic back up on Crescent Heights for vehicle traffic making the semi blind right turn from Crescent Heights to Sunset Blvd.
- At completion, an upgraded sheltered, lighted bus stop should be located at the west side of Sunset Blvd (8150 Sunset Blvd.) This will allow for safer transit rider-pedestrian access going to and from the project site, without having to cross the Crescent Heights. Additionally the current bus location can accommodate significant improvements and upgrades for transit and bus-bike riders

## **BUS SERVICE**

- Project proposes late night operations and events until 2am close.
- Local bus late night "Owl Service" only runs every hour after 11:30pm and limited weekend/holiday service - People will drive a car.
- No Rapid bus service nights or weekends or holidays
- Rapid bus redirected for Hollywood Blvd event closures - Sunset Blvd, then walk 1/2 mile to Red line

## **BUS STOP IMPROVEMENTS**

Significant improvements required for all current bus stops on Sunset Blvd, Laurel Canyon, Crescent Heights and at Fairfax Ave & Sunset Blvd. The DEIR does not provide information or detail on what improvement are proposed for current bus stop location and when improvement will take place.



## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

- The project anticipates hundreds of new residents, employees and patrons will travel by bus to and from the project site.
- All bus stops serving the project site Must be upgraded to be sheltered and lighted (Absolute minimum)
- Safety upgrades needed at all bus stops to accommodate Hundreds of new and future transit riders
- Sidewalk upgrades around all bus stops to accommodate Hundreds of new and future transit riders
- Moving the bus stop farther away from the project site, forcing transit riders to walk back and cross Crescent Heights is ridiculous, when the City owned traffic island could become a City owned "transit island" providing better, safe service for all transit riders. Disability service, seniors, children, transit riders with bikes etc.



### APPLICANT TEXT:

#### (e) Access

<sup>15</sup>Note also that these ridership estimates do not include the use of several additional bus lines that do not serve the Project Site directly but which provide stops within convenient walking distance (Metro Lines 217 and 780, and the West Hollywood CityLine), which would further reduce the potential new “per bus” ridership.

- **Sunset Blvd & Fairfax Ave bus stops are hardly acceptable to be "high quality or major transit stops"**
- The DEIR does not discuss the project's plans for improvements and upgrades to the current bus stops along Sunset Blvd, Crescent Heights,

SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET  
Laurel Canyon, Fairfax Ave and sidewalks that would be needed to  
accommodate the projects anticipated pedestrians, bike riders and future  
generated transit use.



Bus Stop-Line 780 on **Fairfax Ave** - west side at Sunset Blvd



Bus Stop - eastbound on **Sunset Blvd** at Fairfax

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET



Bus Stop-Line 780 northbound on **Fairfax Ave** - east side at Sunset Blvd

The proposed re-location of the local bus stop is to a narrow sidewalk that would not accommodate a bus stop with shelter

Would not accommodate pedestrians and bus riders and bicycles

Is not American Disability Act (ADA) compliant

### **The current bus stop location could:**

- Completely accommodate the bus and anticipated hundreds of new bus riders and riders with bikes
- Have the bus stop at the project site, residents, employees, patrons don't need to cross the street
- Bus stop should be improved and enhanced using green technologies, such as solar shelter roofs of lighting.

### **ADDITIONAL TRANSIT COMMENTS**

The Bus Stop location should be evaluated as part of the EIR as the adjacent streets are impacted by its location. Moving the location east to mid block between Crescent Heights and Laurel could work if the right turn lane and triangular median at the east lane of Crescent Heights were improved. Please study how this new location and improvements might help mitigate impacts for this Project.

Removing the traffic island on the northwest corner of Sunset/Crescent Heights will cause mobility issues for eastbound traffic on Sunset trying to turn south. The acute angle will make it impossible for large vehicles to make that turn, and in turn add congestion to Sunset by forcing all heavy traffic to remain on Sunset until Fairfax. This is not addressed at all in the EIR.

1) The dangers and increased congestion that will result in removing the current right turn lane, which eases traffic blockages at the Southwest corner of Sunset and Crescent Heights:

a) Having tried to turn right (as the DEIR recommends) from the eastern edge of the traffic island, a normal sized car (in my case, a Toyota Highlander Hybrid) cannot make the turn without invading the outside southbound lane of traffic - the lane closest to the northbound traffic. Thus, almost any vehicle will invade the second lane while making a right turn; and after experimenting again driving our

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

Suburban, a vehicle of that size also invades the left turn lane of the NORTHBOUND traffic. A Suburban is not an extremely large vehicle - many standard pick-up trucks and freight trucks are larger than a Suburban - and ALL of them would be invading the left-turn lane of the NORTHBOUND traffic if the current easy-access right turn lane is closed. This would lead to a lane closure for the Northbound traffic on Crescent Heights as it moves North into Laurel Canyon.

b) An additional problem with the closure of the easy-access right turn lane is that when turning right around the triangle, drivers will be forced to wait for ALL PEDESTRIANS crossing Crescent Heights. A) This takes "forever" as there are always numerous stragglers paying little heed to the duration of the crossing light; so by the time the last pedestrian completes his crossing, the SOUTHBOUND vehicles on Crescent Heights are already crossing the intersection on their way to Fountain Ave., and it's impossible to break into this steady stream of traffic as one tries - in vain - to complete a right turn to drive south. This results in a massive tie-up and build-up of the East bound traffic behind the vehicle making the slow, unto impossible right turn.

c) The traffic island acts as a "safety buffer" and several minutes of "free" time (as the pedestrians take a few minutes to cross the rather large triangle) for the easy-access right turning traffic to accomplish their turns into the Southbound Crescent Heights traffic flow. Kindly bear in mind, there is a STOP SIGN allowing "safe" passage into the Southbound traffic.

2) The misguided concept of adding yet another traffic light at the corner of Sunset and Havenhurst.

a) This concept, mentioned both in the DEIR and in the meeting on the 8th will have disastrous consequences for the already congested East-West traffic on Sunset Boulevard. First of all, besides the stoplight on Crescent Heights, there is another traffic light 2 and 1/2 blocks West on the Corner of Roxbury Road and Sunset Boulevard that creates traffic tie-ups during morning and evening rush hour traffic. The light seems perpetually badly timed as one often waits far too long for it to change; and Roxbury Road dies into Sunset, so traffic waits for the almost non-existent vehicles to turn onto Sunset (right and left) from a tiny, almost private road on which there are 4-5 residences. THREE TRAFFIC LIGHTS in a THREE-BLOCK area in two different municipalities seems fraught with further congestive issues.

b) Since two of these lights would be the province of the city of L.A. and the third (Roxbury Road) would be in West Hollywood, there is little hope of ever getting the two traffic departments to synchronize the lights - as they haven't been able to work it out since the Roxbury light was installed - approximately 8 years ago.

3) The DEEPLY misguided idea of installing a new light on the corner of Havenhurst and Fountain Avenue.

a) Again, the amount of feet from the stop light at Crescent Heights and a new one installed on the corner of Havenhurst seems to be less than 100 feet; it would be wise to measure this exactly; and to regulate traffic twice in such a short distance guarantees that there would be traffic trailing into the North-South traffic flow of Crescent Heights at almost every change of the light. There will always be drivers

SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET  
who think they can scrunch in to the traffic ahead of them to "beat" the light; and the result is to disrupt, not only the East=West traffic - but all the pedestrians crossing who will be endangered as they are required to walk around the cars blocking their crosswalk. And with less than 100 feet of squeeze-in space, cars will always "trail" into the intersection behind the two lights

b) This same "trailing" phenomenon will be exhibited at the Sunset and Havenhurst dual stoplights also.

The current site does not have a problem entering at Crescent Heights or exiting to the south. There appears to be a carriage or drop off lane proposed on Crescent Heights. If there is only an "insignificant increase in the daily trips, what is this for? Other projects in the area and on similar corners do not have this feature. Is this feature necessitated by recommendation from the Consultant allowing new northbound turns on to Crescent Heights?

There is no safe provision of entry, exit, or riding of the 972 bicycles they are proposing to park. Bike paths are not on Sunset. They are on Santa Monica Blvd. The ridership suggested by the number is not supported by any current use patterns on Sunset. This extraordinarily large quantity is clearly an unrealistic proposal. Real data needs to be evaluated much more accurately and carefully in the EIR.

DEIR fails to provide detail on the bus stop. While we understand relocating the bus stop on the east side of crescent heights during construction. Relocating the bus stop permanently will probably not be ADA compliant. You need 7 unobstructed feet; it is on a slope, not enough depth of sidewalk,

Mayor of West Hollywood John D'Amico on 8150 traffic

"I am very concerned about the mega development proposal that has been floated for the MTA lot at San Vicente and Santa Monica (<http://www.wehoville.com/2013/02/01/cohen-brothers-mta-reach-exclusive-agreement-for-proposed-mega-complex-at-weho-depot/>) and the proposed development just outside our city borders at Crescent Heights and Sunset (<http://www.wehoville.com/2015/01/06/study-projects-traffic-impact-fountain-avenue-8150-sunset-project/>). Developments like these have the potential to exact great harm on this part of the L.A. Basin and West Hollywood specifically. A development as large as these should not be considered until mass transit reaches the area, and West Hollywood should do all it can to fight the approval of these developments in their current incarnations. And developments like these should be brought to the voters for approval not simply presented to the council members for an up or down vote."

Source: wehoville.com

The Hollywood General Plan states "no increase in density shall be effected by zone change or subdivision unless it is determined that the local streets, major and secondary highways, freeways, and public transportation available in the area of the property involved, are adequate to serve the traffic generated"



The intersection of Sunset and Crescent Heights is rated a LOS F. How is a failing grade considered adequate? Does the criteria for defining “adequate” streets include the current traffic counts?

## NOISE

### APPLICANT TEXT:

The Project would include three areas where events could be held, including gatherings of 50 to 500 guests accompanied by amplified background music. Each is discussed in detail separately.

**Sunset Terrace - 500 people** (not including event staff, security/safety personnel, etc.).

According to the applicant, the operation hours of the Sunset Terrace would be **10AM to 10PM. (Sunday through Thursday)** and **10 AM. to Midnight (Friday and Saturday).**

**Rooftop Lounge Terrace** - The Rooftop Lounge Terrace would open as early as **10AM** to serve breakfast and **close as late as 2AM.** However, live music, amplified speech, or loud amplified music would be not allowed in the Rooftop Lounge Terrace.

noise levels generated by dining activities of approximately **500 people** with background music could be as high as 73 dBA at 40 feet from the boundary of the Rooftop Lounge Terrace.

**Pool Terrace - Level 9** The residential component of the Project would include amenities such as a private pool/pool deck (Pool Terrace) on Level 9. The Pool Terrace is located approximately 94 feet above ground. The nearest residential uses (R4) is located approximately 20 feet from the Pool Terrace. However, the Pool Terrace is located approximately 74 feet above the top of the nearest residential uses (R4).

### **Internal Patios and Central Plaza**

The operation hours of Internal Patios and Central Plaza would be **10AM to 2AM daily.** Noise generated by operation of the Internal Patios and Central Plaza generally **includes music (amplified) and crowds of people (applause and cheer).** Noise from amplified music would be controlled by limiting the allowable volume level from equipment. Noise levels generated by crowds (applause and cheers), however, **could be as high as 86 dBA** (maximum sound level) at the back row of the event terrace based on measurements of similar events.

## COMMENTS CONTINUED

**The project states the mall, restaurants, bars, lounges and entertainment activity, will operate on multiple levels until 2AM.** The DEIR does not provide information regarding noise mitigation for the residents.

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

The DEIR fails to adequately assess indoor pollutants and noise pollution created by the commercial and restaurant tenants that will affect the residential tenants. Including but not limited to noise from bar patrons, noise from loading and unloading trucks, noise from valet line, noise from taxi line. Indoor pollutants such as lingering smells, cooking pollutants, second hand smoke, amplified music, concerts and applause.

The DEIR fail to state what activity will be taking place on the roof now that they have withdrawn an application for rooftop restaurants and clubs.

The DEIR fails to state the hours of any resident only common area.

The DEIR fails to state if any of their spaces can be used for special event parties.

The DEIR fails to mention the noise generated by any rooftop or resident common areas and what hours will be enforced and how

## SOLAR TECHNOLOGY USE

**The DEIR fails to provide detail regarding the project's use of solar technologies, panel use, placements, impacts to surrounding properties and any health affects to surrounding neighborhood and properties.**

The DEIR fails to provide a breakdown and information or detail regarding impacts to existing buildings and properties surrounding the project site as to how many properties will no longer have the ability to use solar energy technologies and or the level of reduced capacity and capability surrounding property sites will have when utilizing solar technology in the future due to shading effects from the project's building heights.

The DEIR fails to provide information and or detail regarding impacts to future use of solar for city street lights, bus stops and other infrastructure that would use solar technology as part of their sustainable upgrades.

Use of Solar panels in and close to High Fire Danger areas requires special specific planning and installation locations.

## AFFORDABLE HOUSING

The project's residential unit count appears to be based on density bonuses provided under the City's housing policy. It appears that the total proposed amount of affordable housing is 11% of the total residential units. Research how the Applicant summarizes how the unit counts qualify for this bonus based on number of one and two bedroom units and number of very low and low-income units.

State Code Section 65915 discusses that the bonus should reflect what is necessary to offset costs.

This project does not appear to qualify for an off-menu incentive for Affordable Housing because it is more than 1500' from a major transit stop. The Applicant is asking for a Variance in order to qualify for an incentive/bonus density. How does

## **SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET**

this work legally? Why cannot even developer property owner ask for a variance to qualify for a bonus? Does this not put the City (and taxpayers) at risk of losing more expensive lawsuits?

The DEIR fails to adequately state where the affordable housing units will be placed within the building? Will they be on a separate floor? Will the affordable housing tenants be given less desirable units? Will the affordable housing tenants have the same finishes and appliances as market rate units?

The DEIR fails to state at what price and how many affordable income units will sell if they choose to condo the building.

The DEIR fails to include adequate information on what services the affordable income tenants will be allowed to use.

The DEIR fails to state if the affordable income occupants will be able to use the resident valet for free without tip since at many times there will be no self park option for them. How will free parking without tip, if provided to the affordable income tenants, be enforced by the owners in perpetuity through outside valet companies?

The DEIR does not state the layout and size of the affordable income units.

The DEIR does not state whether affordable income occupants and guests will be able to use the same door as “market rate” residents as proposed in their West Hollywood building. <http://www.latimes.com/local/westside/la-me-poor-doors-20140811-story.html>

## **EARTHQUAKE - SEISMIC STUDY**

With the release of the latest data for the Hollywood Earthquake Fault, the community should be informed about the location or assumed location of the fault at this site. Please have the Consultant indicate, in Map form in the Report, where the testing was undertaken on the site and what were the results.

The DEIR fails to estimate emissions if trenching is needed as they are in the Alquist-Priolo earthquake zone.

The DEIR fails to state what emergency evacuation plans will be as they are in Alquist Priolo zone.



## **SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET**

The DEIR fails to state what impact the valet only residential parking will have on evacuation measures. How will valet only parking effect the evacuation of the sick and disabled whose only viable means of evacuation might be by car?

The DEIR fails to state evacuation methods pursuant to ADA guidelines within an aliquo priolto earthquake zone

The DEIR does not adequately define what trenching methods will take place on the property as it is in Alquist Priolo zone

## **COMMUNITY IMPACT**

The DEIR is inadequate and contains insufficient information to allow the decision makers to reach correct conclusions and findings regarding the project's impact on historical resources and the existing neighborhood. Cumulative impacts and the development of other sites are also completely unstudied based on completely incorrect information.

Placing a new 216 foot tall building with a bulk of 333,903 square feet next to a building of 14,318 square feet is overwhelming and the DEIR does not discuss adequately (except to draw the conclusion that it will not create a significant impact) how such a project complies with the Hollywood Community Plan

There is no discussion in the DEIR of the principals noted above from the Hollywood Community Plan---merely a conclusion that the building is not disruptive and causes no significant impact—a bare conclusion not supported by the facts, any reasonable discussion or reconciliation of the principals and policies and appears erroneous. An in depth discussion is needed as to how the proposed building is sympathetic to the scale and form of the existing neighborhood so as to reconcile the erroneous conclusions of no impacts or less than significant impacts.

The DEIR does not state the economic impact of more traffic, more shade, more glare on buildings on Havenhurst

The DEIR does not state the economic impact on hillside residents who open view will be impacted by a 216 ft. tower

The DEIR does not state what outside advertising there will be, or if they will have any digital displays facing the street causing light pollution and visual blight.

The DEIR does state whether cell towers will be placed on the site

The DEIR states that the Billboard on the site has been at one digital and/or illuminated. The billboard is lit up by spotlights at night but has never been a digital board.

The DEIR fails to address the “respect other neighbors” policy in Hollywood Community Plan, There is a 10-story West Hollywood height limit that is not addresses in the DEIR.

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

The DEIR incorrectly labels the homes in the bordered by Selma, sunset and crescent heights as multi family units. All these homes are single-family residences.

### **FIRE AND SAFETY**

The DEIR fails to use statistics and response time from fire station 41. It used only stats for Station 27. Please inquire why a station that also serves this area was not included? Please get the response times information from this Station 41.

LAFD requires 9000 gallon a minute from 4 hydrants known as the GPM flowing simultaneously. The hydrants currently at the site produce less then 4000 gallons per minute. This is insufficient according to the LA city fire code. The DEIR does not contain plans to remedy this oversight in public safety. (see LAFD letters)

The DEIR fails to accurately represent the reduced response time for fire and first responders traveling to and from adjacent Hillside Communities. The L.O.S. standards of measure for everyday drivers is not an accurate estimate of delay time for first responders when seconds count.

### **SAFETY DURING CONSTRUCTION**

The community traffic will suffer an unavoidable “significant impact” during construction. Can the applicant limit start construction later in the morning in order to correspond with our later commute time on Sunset Blvd. a 10:00am start time would be ideal.

Pedestrian safety during construction is not addressed in the DEIR

The DEIR fails to state mitigation efforts to reduce construction worker’s cars idling and blocking lanes.

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET



La Cienega and Sunset Blvd. Construction worker pulled over the black SUV pictured, blocked half a lane, then ran across the street while leaving car idling.



La Cienega and Sunset Blvd. Pedestrian with no sidewalk, forced to dangerously walk in road.

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

### PHOTOS





SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET



**A NEW COMPREHENSIVE HISTORIC SURVEY MUST BE COMPLETED BEFORE CERTIFICATION**

The Department's initial broad-brush analysis was that the project would have No significant impacts on nearby historic resources and that no mitigation measures are necessary, again stands as a bare conclusion without adequate discussion or support. Not only is this position wrong as a matter of law, even to the casual observer, it was obvious from the beginning that it was reasonable to believe that that the project, unless mitigated may lead to some adverse impacts.

These resources represent a variety of important architectural styles starting from the early 20th century; three on Havenhurst alone are on the National Register of Historic Places. This neighborhood also exhibits a consistent development pattern including height, scale, bulk, massing, rhythm, architectural detail and use of materials that creates cohesive groupings of buildings, districts and neighborhoods.

The DEIR indicates numerous potential and acknowledged historic resources but concludes that no impacts will occur because that previous development in the 50's and 60's has nullified a need to preserve our older buildings, and nullified the need to respect our buildings from the 20's and 30's. Therefore, the DEIR do not meet accepted professional standards. By design, a Survey or historic resources evaluation report is intended to prioritize the evaluation of properties that are directly impacted by the proposed project. The approach used here is inadequate as a matter of law. The full and complete analysis of the impacts of the project cannot be deferred or separated from approval and certification of the final EIR. In order to comply with law the DEIR must adequately and completely fully disclose all potential impacts to the historic resources in the area impacted by the project.

There is only dismissive analysis as to how this conclusion is reached. A specific analysis of the impact on the potential historic properties requires that a DEIR be adequate, complete, and a good faith effort at full disclosure per CEQA Guideline 15151.

It is unthinkable that this project could go forward without such a complete survey. The lack of comprehensive survey shifts the burden of monitoring to the neighborhood, creates a reactive process rather than proactively planning for the treatment of historic resources, and leaves open the potential for development decisions to be made about properties without the benefit of knowing whether they are historic resources.

**CONCLUSION**

The Department is presenting a DEIR to the public, which is incomplete. A request for certification on such a document is directly contrary to CEQA. "The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure." (CEQA Guidelines, 15151.)

The ultimate decision of whether to approve a project, be that decision right or wrong, is a nullity if based upon an EIR that does not provide the decision-makers,

**SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET**  
and the public, with the information about the project that is required by CEQA.' "  
(San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus, supra, 27  
Cal.App.4th at pp. 721-722, quoting Santiago County Water Dist. v. County of  
Orange (1981) 118  
Cal.App.3d 818, 829 [173 Cal.Rptr. 602].) If the description of the environmental  
setting of the project site and surrounding area is inaccurate, incomplete or  
misleading, the EIR does not comply with CEQA. Without accurate and complete  
information pertaining to the setting of the project and surrounding uses, it cannot  
be found that the EIR adequately investigated and discussed the environmental  
impacts of the development project.

SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET



SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

**Policies: City of Los Angeles General Plan Framework**

ADDENDUM 5 - LA City General Plan - Neighborhood Districts

**Chapter 3. Neighborhood Districts**

Chapter 3. Neighborhood Districts

<http://cityplanning.lacity.org/cwd/framwk/chapters/03/03203.htm#policy3.8.1>

**Reinforce existing and establish new neighborhood districts which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood activity, are compatible with adjacent neighborhoods, and are developed as desirable places to work and visit.**

***Policies***

*Uses and Density*

**3.8.1**

Accommodate the development of neighborhood-serving uses in areas designated as "Neighborhood District" in accordance with Tables 3-1 and 3-4. The range and densities/intensities of uses permitted in any area shall be identified in the community plans. (P1, P18)

**Table 3-4**  
**Land Use Designation**  
**Corresponding Zones**  
Neighborhood District  
C1, C1.5, C4, [Q]C2

**3.8.2**

Encourage the retention of existing and development of new commercial uses that primarily are oriented to the residents of adjacent neighborhoods and promote the inclusion of community services (e.g., childcare and community meeting rooms). (P1, P18, P34)

**3.8.3**

Encourage the owners of existing commercial shopping centers that contain chain grocery and drug stores to include additional uses, such as restaurants, entertainment, childcare facilities, public meeting rooms, recreation, cultural facilities, and public open spaces, which enhance neighborhood activity. (P18, P35)



## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET



Shopping center incorporating retail shops with upper level housing and pedestrian-oriented amenities district - Open air marketplace incorporated in neighborhood

### *Design and Development*

#### **3.8.4**

Enhance pedestrian activity by the design and siting of structures in accordance [Chapter 5](#) Urban Form and Neighborhood Design policies of this Element and Pedestrian-Oriented District Policies [3.16.1](#) through [3.16.3](#). ([P1](#), [P18](#), [P24](#), [P25](#))

#### **3.8.5**

Initiate a program of streetscape improvements, where appropriate. ([P30](#), [P31](#), [P32](#))

#### **3.8.6**

Encourage out door areas within neighborhood districts to be lighted for night use, safety and comfort commensurate with their intended nighttime use. ([P17](#), [P24](#))

[Return to Multi-Family Residential | Chapter Contents | Advance to Community Centers](#)

### Chapter 3. Implementation Programs

<http://cityplanning.lacity.org/cwd/framwk/chapters/10/10.htm#P17>

## ORDINANCES

### P18

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

Amend the Zoning Ordinance to implement the policies and standards of the General Plan Framework Element. The revisions provide tools needed to which are described below and are representative of the actions that may be taken.

- a. Revise land use and density classifications, zoning maps, and pertinent development standards (e.g, parking standards, design of multi-family units, pedestrian districts, development transitions, and other) to reflect the concepts contained in the Framework Element, appropriately applied through amendments of the community plans consistent with community characteristics.
- b. Establish incentives to stimulate the types of use desired (e.g., mixed-use, community facilities in centers, districts, and boulevards, and other) and development in appropriate selected targeted growth areas as defined in the community plans, such as density bonuses for mixed-use development, parking in proximity to transit stations and transit corridors, "by-right" entitlements with administrative review and approval for traffic or other necessary studies and mitigation, and other.
- c. Permit the incorporation of revenue-generating recreation facilities into communities, where such uses are feasible and where levying fees would not place an undue hardship on the users.
- d. Allow commercial structures and multi-family dwelling units destroyed by natural catastrophes to be re-constructed to their pre-existing use and density in any areas where permitted densities may be reduced by amendments to the community plans.
- e. Establish reasonable defensible space design requirements that will help ensure maximum visibility and security for entrances, pathways, and corridors, as well as open space (both public and private) and parking lots or structures. The code and design review amendments should address landscaping and lighting in addition to site design.

Responsibility: Department of City Planning, with assistance from the Departments of Transportation and Public Works and the Community Redevelopment Agency and the Los Angeles Unified School District

Funding Source: General Fund and State funds

Schedule: Within one year of General Plan Framework Element adoption and ongoing, as necessary.

## DEVELOPMENT STANDARDS AND GUIDELINES

The following may be implemented through (1) guidelines to be adopted by the City Planning Commission (CPC) and/or Council, or (2) codification (ordinances) enacted by the City Council. The method of implementation should be determined after Framework Element adoption.

### P24

Formulate citywide development standards that:

- a. Enhance and/or conserve the appearance and functionality of residential and commercial areas, including appropriate applications for mixed-use structures that

## SAVE SUNSET BOULEVARD - DEIR COMMENTS ON 8150 SUNSET

integrate housing with commercial uses. The following indicates a preliminary list of standards that may be considered.

- (1) Encourage and facilitate the assembly of small lots for higher-density housing or mixed- use
  - (2) Encourage mixed-use development to locate on lots with side street access so that traffic flows and the pedestrian-oriented street frontage can be uninterrupted.
  - (3) Provide incentives for a mix of residential unit sizes in the R3, R4 and R5 zones through the replacement of the habitable room-based density range by a single density.
  - (4) Separate the measurement of intensity (floor area ratio/FAR) from building coverage and do not exclude required yards from the permitted FAR.
  - (5) Increase per-unit on-site space requirement for all multi-family residential buildings.
  - (6) Require transitional heights and buffers between higher-density housing and single- family homes.
  - (7) Provide landscape options: more but smaller size (e.g., 15 gallon) trees in lieu of fewer larger size (e.g., 24-inch box) trees.
  - (8) Protect residential areas from the intrusion of "through traffic" by implementing neighborhood traffic management strategies.
  - (9) Require street trees at the minimum spacing permitted by the Division of Street Trees.
  - (10) Wherever possible, along secondary and major highways, require driveway access to buildings from side streets or alleys to minimize interference with pedestrian access and vehicular movement.
  - (11) For parking structures, screen architecturally or with landscaping, locate no more than one level above grade in residential areas, and screen direct views of headlights/building lights from building exterior.
- b. Enhance the appearance and function of public infrastructure and development, considering:
- (1) Sidewalk improvement standards; location, appropriate width, species and spacing of trees as well as street furniture and street lighting.
  - (2) Revise street tree standards, including species and placement to enhance pedestrian- oriented districts and centers with a continuous tree canopy. Broadleaf evergreen and deciduous trees should be used whenever feasible.
  - (3) Revise street tree maintenance and removal standards.

Responsibility: Departments of City Planning, Transportation, and Public Works

Funding Source: General Fund, Street Lighting Assessment Fund

Schedule: Initiate within 18 months of Framework Element adoption



# CITY OF WEST HOLLYWOOD

CITY HALL  
8300 SANTA MONICA BLVD.  
WEST HOLLYWOOD, CA  
90069-6216  
TEL: (323) 848-6475  
FAX: (323) 848-6575

TTY: For hearing impaired  
(323) 848-6496

**COMMUNITY  
DEVELOPMENT  
DEPARTMENT**

October 14, 2013

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

RE: Notice of Preparation of a Draft Environmental Impact Report  
8150 Sunset Boulevard Mixed-Use Project  
Case Number: ENV-2013-2552-EIR

Dear Ms. Hewawitharana:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Draft Environmental Impact Report (DEIR) for the 8150 Sunset Boulevard Mixed-Use Project (Project). Included in this letter is a list of issues the City of West Hollywood would like studied in the DEIR that is to be completed for the Project.

## ANALYSIS REQUESTED

Due to the Project's close proximity to the City boundary, there is a potential that the City of West Hollywood and its residents could experience negative impacts both during the construction of the Project and as a result of operation thereafter. The Project has a potential to create negative impacts and therefore the City of West Hollywood requests that the potential for any environmental impact, including the following specific issues, be studied in the DEIR:

## TRAFFIC

Due to the Project's vicinity to the City of West Hollywood, the following intersections are requested to be studied as part of the DEIR traffic analysis:

1. Sunset Blvd. & Harper Ave.
2. Sunset Blvd. & Sweetzer Ave.
3. Sunset Blvd. & La Cienega Blvd.
4. Fountain Ave. & Fairfax Ave.
5. Fountain Ave. & Crescent Heights Blvd.
6. Fountain Ave. & Havenhurst Dr.
7. Fountain Ave. & Sweetzer Ave.





8. Fountain Ave. & La Cienega Blvd.
9. Santa Monica Blvd. & Fairfax Ave.
10. Santa Monica Blvd. & Crescent Heights Blvd.

In addition to the intersections listed above, please also study the residential street segment of Havenhurst Drive between Sunset Boulevard and Fountain Avenue.

As part of the study, consider traffic generated by cumulative projects located within the City of West Hollywood. The list of projects is available upon request.

For all study locations within the City of West Hollywood, please use the City of West Hollywood's adopted level of service methodologies and significant impact criteria when assessing potential traffic impacts. Please contact the City's Transportation Planner, Bob Cheung, at (323) 848-6346 for the methodology and thresholds of significant impact criteria.

## INFRASTRUCTURE

The Project is located just to the north of the City of West Hollywood boundary at Crescent Heights Boulevard and Havenhurst Avenue. The City of West Hollywood owns and operates 8-inch diameter sewer lines which convey flows from north to south in both of these streets. The Project will have sewer flow which will discharge into both of these City of West Hollywood sewers.

The Project may generate a net increase of sewage flow into the City of West Hollywood sewers. Therefore, the City of West Hollywood requests a sewer capacity study be conducted to evaluate the impacts to the downstream City of West Hollywood sewers, and include all necessary mitigation measures to ensure our sewer system is protected.

Also, if the Project uses a large portion of the available capacity of the City of West Hollywood sewers, then it could potentially preclude any future development within the City of West Hollywood from being able to discharge flows into these sewers. If the capacity of the City of West Hollywood sewers is impacted, relief sewers or larger pipes need to be installed to provide additional capacity for the City of West Hollywood sewer system.

Here is a link to West Hollywood's guideline packet for preparation of a sewer capacity study:

<http://www.weho.org/Modules/ShowDocument.aspx?documentid=2320>



Please use this as a starting point to put together a scope of work for the DEIR sewer capacity study.

## CULTURAL RESOURCES

Eight (8) designated Cultural Resources and one Thematic District located in the City of West Hollywood are within a quarter-mile radius of the project site. Due to the Project's proximity to these historic resources, we request that the Project's potential impacts on these resources be studied as part of the DEIR.

## NOISE

The Project may generate a substantial permanent increase in ambient noise levels in the project vicinity due to project-related traffic, truck loading and unloading for businesses within the Project, and HVAC systems. The proposed outdoor dining above the ground floor, and the rooftop restaurant use, may also contribute to a permanent ambient noise level increase which may negatively impact surrounding properties within the City of West Hollywood. Thus, we request that these potential noise impacts be studied as part of the DEIR.

## LIGHT, GLARE, AND SHADE

The Project includes buildings that will be up to 16-stories tall (approximately 216 feet in height), introduces new building surface materials to the site, and includes nighttime illumination which may cause light, glare, and shade impacts on surrounding properties within the City of West Hollywood. We request that these issues be studied as part of the DEIR.

## SEISMIC

The Project is located within close proximity to the active Hollywood Fault. Given the increased level of ground shaking in areas near active faults, we request that all geology, soils, and building design requirements related to seismic activity be studied as part of the DEIR to ensure the protection of public safety.

## CONSTRUCTION IMPACTS

All potential construction related impacts for the proposed project should be studied in detail, and mitigation measures should be proposed when applicable. This includes, but is not limited to, all of the following:

1. Heavy haul routing
2. Haul frequency





## CITY OF WEST HOLLYWOOD

3. Truck size
4. Hours of construction
5. Street closures
6. Location of construction ramps and driveways
7. Construction parking supply (Note: No construction parking will be allowed within the City of West Hollywood)
8. Construction Noise
9. Project Duration
10. Dust control and truck wheel washing practice
11. Pavement quality control
12. Any other construction related issues and information that could impact City of West Hollywood neighborhoods

If any construction related haul route passes through the City of West Hollywood, dust control for construction traffic needs to be addressed. We request that the DEIR specify the mitigation measures for this issue.

### PUBLIC NOTICE

Thank you again for this opportunity to provide input on the environmental review of this project. Please list me as primary contact for the City of West Hollywood, and place my name on the list of interested parties to receive copies of all notices issued regarding the Project. Please also provide a copy of any notice of determination that may be filed with respect to the Project, pursuant to the provisions of Public Resources Code Section 21197 (f).

If you have any questions regarding this letter, please feel free to contact me.

Best Regards,

Scott Lunceford, AICP  
Contract Planner  
Current and Historic Preservation Planning  
City of West Hollywood  
[slunceford@weho.org](mailto:slunceford@weho.org)  
323-848-6427



DEPARTMENT OF  
**CITY PLANNING**  
200 N. SPRING STREET, ROOM 525  
LOS ANGELES, CA 90012-4801  
AND  
6262 VAN NUYS BLVD., SUITE 351  
VAN NUYS, CA 91401  
-  
CITY PLANNING COMMISSION

RENEE DAKE WILSON  
PRESIDENT  
DANA M. PERLMAN  
VICE-PRESIDENT

ROBERT L. AHN  
DAVID H. J. AMBROZ  
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RICHARD KATZ  
JOHN W. MACK  
MARTA SEGURA

JAMES K. WILLIAMS  
COMMISSION EXECUTIVE ASSISTANT II  
(213) 978-1300

**CITY OF LOS ANGELES**  
CALIFORNIA



ERIC GARCETTI  
MAYOR

**EXECUTIVE OFFICES**

MICHAEL J. LOGRANDE  
DIRECTOR  
(213) 978-1271

ALAN BELL, AICP  
DEPUTY DIRECTOR  
(213) 978-1272

LISA M. WEBBER, AICP  
DEPUTY DIRECTOR  
(213) 978-1274

JAN ZATORSKI  
DEPUTY DIRECTOR  
(213) 978-1273

FAX: (213) 978-1275

INFORMATION  
[www.planning.lacity.org](http://www.planning.lacity.org)

**May 16, 2014**

**NOTICE OF ENVIRONMENTAL LEADERSHIP DEVELOPMENT PROJECT (ELDP)**

**CASE NO.:**

ENV-2013-2552-EIR

**PROJECT NAME:**

8150 Sunset Boulevard Mixed-Use Project

**PROJECT APPLICANT:**

AG-SCH 8150 Sunset Boulevard Owner, L.P.

**PROJECT LOCATION/ADDRESS:**

8150 Sunset Boulevard

**COMMUNITY PLANNING AREA:**

Hollywood Community Plan Area

**COUNCIL DISTRICT:**

4 – Tom LaBonge

THE APPLICANT HAS ELECTED TO PROCEED UNDER CHAPTER 6.5 (COMMENCING WITH SECTION 21178) OF THE PUBLIC RESOURCES CODE, WHICH PROVIDES, AMONG OTHER THINGS, THAT ANY JUDICIAL ACTION CHALLENGING THE CERTIFICATION OF THE EIR OR THE APPROVAL OF THE PROJECT DESCRIBED IN THE EIR IS SUBJECT TO THE PROCEDURES SET FORTH IN SECTIONS 21185 TO 21186, INCLUSIVE, OF THE PUBLIC RESOURCES CODE. A COPY OF CHAPTER 6.5 (COMMENCING WITH SECTION 21178) OF THE PUBLIC RESOURCES CODE IS INCLUDED BELOW.

PUBLIC RESOURCES CODE - PRC  
DIVISION 13. ENVIRONMENTAL QUALITY [21000 - 21189.3]  
(Division 13 added by Stats. 1970, Ch. 1433.)

CHAPTER 6.5. Jobs and Economic Improvement Through Environmental Leadership Act of 2011 [21178 - 21189.3] (Chapter 6.5 added by Stats. 2011, Ch. 354, Sec. 1.)

21178. The Legislature finds and declares all of the following:

- (a) The overall unemployment rate in California is 12 percent, and in certain regions of the state that rate exceeds 13 percent.
- (b) The California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code) requires that the environmental impacts of development projects be identified and mitigated.
- (c) The act also guarantees the public an opportunity to review and comment on the environmental impacts of a project and to participate meaningfully in the development of mitigation measures for potentially significant environmental impacts.

- (d) There are large projects under consideration in various regions of the state that would replace old and outmoded facilities with new job-creating facilities to meet those regions' needs while also establishing new, cutting-edge environmental benefits to those regions.
- (e) These projects are privately financed or financed from revenues generated from the projects themselves and do not require taxpayer financing.
- (f) These projects further will generate thousands of full-time jobs during construction and thousands of additional permanent jobs once they are constructed and operating.
- (g) These projects also present an unprecedented opportunity to implement nation-leading innovative measures that will significantly reduce traffic, air quality, and other significant environmental impacts, and fully mitigate the greenhouse gas emissions resulting from passenger vehicle trips attributed to the project.
- (h) These pollution reductions will be the best in the nation compared to other comparable projects in the United States.
- (i) The purpose of this act is to provide unique and unprecedented streamlining benefits under the California Environmental Quality Act for projects that provide the benefits described above for a limited period of time to put people to work as soon as possible.

21180. For the purposes of this chapter, the following terms shall have the following meanings:

- (a) "Applicant" means a public or private entity or its affiliates, or a person or entity that undertakes a public works project, that proposes a project and its successors, heirs, and assignees.
- (b) "Environmental leadership development project," "leadership project," or "project" means a project as described in Section 21065 that is one the following:
  - (1) A residential, retail, commercial, sports, cultural, entertainment, or recreational use project that is certified as LEED silver or better by the United States Green Building Council and, where applicable, that achieves a 10-percent greater standard for transportation efficiency than for comparable projects. These projects must be located on an infill site. For a project that is within a metropolitan planning organization for which a sustainable communities strategy or alternative planning strategy is in effect, the infill project shall be consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, for which the State Air Resources Board, pursuant to subparagraph (H) of paragraph (2) of subdivision (b) of Section 65080 of the Government Code, has accepted a metropolitan planning organization's determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets.
  - (2) A clean renewable energy project that generates electricity exclusively through wind or solar, but not including waste incineration or conversion.
  - (3) A clean energy manufacturing project that manufactures products, equipment, or components used for renewable energy generation, energy efficiency, or for the production of clean alternative fuel vehicles.
- (c) "Transportation efficiency" means the number of vehicle trips by employees, visitors, or customers of the residential, retail, commercial, sports, cultural, entertainment, or recreational use project divided by the total number of employees, visitors, and customers.

21181. This chapter does not apply to a project if the Governor does not certify a project as an environmental leadership development project eligible for streamlining provided pursuant to this chapter prior to January 1, 2016.

21182. A person proposing to construct a leadership project may apply to the Governor for certification that the leadership project is eligible for streamlining provided by this chapter. The

person shall supply evidence and materials that the Governor deems necessary to make a decision on the application. Any evidence or materials shall be made available to the public at least 15 days before the Governor certifies a project pursuant to this chapter.

21183. The Governor may certify a leadership project for streamlining pursuant to this chapter if all the following conditions are met:

- (a) The project will result in a minimum investment of one hundred million dollars (\$100,000,000) in California upon completion of construction.
- (b) The project creates high-wage, highly skilled jobs that pay prevailing wages and living wages and provide construction jobs and permanent jobs for Californians, and helps reduce unemployment. For purposes of this subdivision, "jobs that pay prevailing wages" means that all construction workers employed in the execution of the project will receive at least the general prevailing rate of per diem wages for the type of work and geographic area, as determined by the Director of Industrial Relations pursuant to Sections 1773 and 1773.9 of the Labor Code. If the project is certified for streamlining, the project applicant shall include this requirement in all contracts for the performance of the work.
- (c) The project does not result in any net additional emission of greenhouse gases, including greenhouse gas emissions from employee transportation, as determined by the State Air Resources Board pursuant to Division 25.5 (commencing with Section 38500) of the Health and Safety Code.
- (d) The project applicant has entered into a binding and enforceable agreement that all mitigation measures required pursuant to this division to certify the project under this chapter shall be conditions of approval of the project, and those conditions will be fully enforceable by the lead agency or another agency designated by the lead agency. In the case of environmental mitigation measures, the applicant agrees, as an ongoing obligation, that those measures will be monitored and enforced by the lead agency for the life of the obligation.
- (e) The project applicant agrees to pay the costs of the Court of Appeal in hearing and deciding any case, including payment of the costs for the appointment of a special master if deemed appropriate by the court, in a form and manner specified by the Judicial Council, as provided in the Rules of Court adopted by the Judicial Council pursuant to subdivision (f) of Section 21185.
- (f) The project applicant agrees to pay the costs of preparing the administrative record for the project concurrent with review and consideration of the project pursuant to this division, in a form and manner specified by the lead agency for the project.

21184. (a) The Governor may certify a project for streamlining pursuant to this chapter if it complies with the conditions specified in Section 21183.

(b) (1) Prior to certifying a project, the Governor shall make a determination that each of the conditions specified in Section 21183 has been met. These findings are not subject to judicial review.

(2) (A) If the Governor determines that a leadership project is eligible for streamlining pursuant to this chapter, he or she shall submit that determination, and any supporting information, to the Joint Legislative Budget Committee for review and concurrence or nonconcurrence.

(B) Within 30 days of receiving the determination, the Joint Legislative Budget Committee shall concur or nonconcur in writing on the determination.

(C) If the Joint Legislative Budget Committee fails to concur or nonconcur on a determination by the Governor within 30 days of the submittal, the leadership project is deemed to be certified.

(c) The Governor may issue guidelines regarding application and certification of projects pursuant to this chapter. Any guidelines issued pursuant to this subdivision are not subject to the rulemaking provisions of the Administrative Procedure Act (Chapter 3.5 (commencing with Section 11340) of Part 1 of Division 3 of Title 2 of the Government Code).

21185. On or before July 1, 2014, the Judicial Council shall adopt a rule of court to establish procedures applicable to actions or proceedings brought to attack, review, set aside, void, or annul the certification of the environmental impact report for an environmental leadership development project certified by the Governor pursuant to this chapter or the granting of any project approvals that require the actions or proceedings, including any potential appeals therefrom, be resolved, within 270 days of certification of the record of proceedings pursuant to Section 21186.

21186. Notwithstanding any other law, the preparation and certification of the administrative record for a leadership project certified by the Governor shall be performed in the following manner:

- (a) The lead agency for the project shall prepare the administrative record pursuant to this division concurrently with the administrative process.
- (b) All documents and other materials placed in the administrative record shall be posted on, and be downloadable from, an Internet Web site maintained by the lead agency commencing with the date of the release of the draft environmental impact report.
- (c) The lead agency shall make available to the public in a readily accessible electronic format the draft environmental impact report and all other documents submitted to, or relied on by, the lead agency in the preparation of the draft environmental impact report.
- (d) A document prepared by the lead agency or submitted by the applicant after the date of the release of the draft environmental impact report that is a part of the record of the proceedings shall be made available to the public in a readily accessible electronic format within five business days after the document is released or received by the lead agency.
- (e) The lead agency shall encourage written comments on the project to be submitted in a readily accessible electronic format, and shall make any comment available to the public in a readily accessible electronic format within five days of its receipt.
- (f) Within seven business days after the receipt of any comment that is not in an electronic format, the lead agency shall convert that comment into a readily accessible electronic format and make it available to the public in that format.
- (g) Notwithstanding paragraphs (b) to (f), inclusive, documents submitted to or relied on by the lead agency that were not prepared specifically for the project and are copyright protected are not required to be made readily accessible in an electronic format. For those copyright-protected documents, the lead agency shall make an index of these documents available in an electronic format no later than the date of the release of the draft environmental impact report, or within five business days if the document is received or relied on by the lead agency after the release of the draft environmental impact report. The index must specify the libraries or lead agency offices in which hardcopies of the copyrighted materials are available for public review.
- (h) The lead agency shall certify the final administrative record within five days of its approval of the project.
- (i) Any dispute arising from the administrative record shall be resolved by the superior court. Unless the superior court directs otherwise, a party disputing the content of the record shall file a motion to augment the record at the time it files its initial brief.
- (j) The contents of the record of proceedings shall be as set forth in subdivision (e) of Section 21167.6.

21187. Within 10 days of the Governor certifying an environmental leadership development project pursuant to this section, the lead agency shall, at the applicant's expense, issue a public notice in no less than 12-point type stating the following:

"THE APPLICANT HAS ELECTED TO PROCEED UNDER CHAPTER 6.5 (COMMENCING WITH SECTION 21178) OF THE PUBLIC RESOURCES CODE, WHICH PROVIDES, AMONG OTHER THINGS, THAT ANY JUDICIAL ACTION CHALLENGING THE CERTIFICATION OF THE EIR OR THE APPROVAL OF THE PROJECT DESCRIBED IN THE EIR IS SUBJECT TO THE PROCEDURES SET FORTH IN SECTIONS 21185 TO 21186, INCLUSIVE, OF THE PUBLIC RESOURCES CODE. A COPY OF CHAPTER 6.5 (COMMENCING WITH SECTION 21178) OF THE PUBLIC RESOURCES CODE IS INCLUDED BELOW."

The public notice shall be distributed by the lead agency as required for public notices issued pursuant to paragraph (3) of subdivision (b) of Section 21092.

21188. The provisions of this chapter are severable. If any provision of this chapter or its application is held to be invalid, that invalidity shall not affect any other provision or application that can be given effect without the invalid provision or application.

21189. Except as otherwise provided expressly in this chapter, nothing in this chapter affects the duty of any party to comply with this division.

21189.1. If, prior to January 1, 2016, a lead agency fails to approve a project certified by the Governor pursuant to this chapter, then the certification expires and is no longer valid.

21189.2. The Judicial Council shall report to the Legislature on or before January 1, 2015, on the effects of this chapter, which shall include, but not be limited to, a description of the benefits, costs, and detriments of the certification of leadership projects pursuant to this chapter.

21189.3. This chapter shall remain in effect until January 1, 2017, and as of that date is repealed unless a later enacted statute extends or repeals that date.

Lisa M. Webber,  
Deputy Director of Planning

A handwritten signature in black ink, appearing to read 'Luciralia Ibarra', with a long, sweeping horizontal line extending to the right.

Luciralia Ibarra  
Project Coordinator



DEPARTMENT OF CITY PLANNING  
Environmental Review Unit  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

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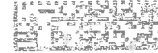


DEPARTMENT OF CITY PLANNING  
Environmental Review Unit  
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Los Angeles, CA 90012

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DEPARTMENT OF CITY PLANNING  
Environmental Review Unit  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

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8665 Burton Way  
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8004803992  
300-223992 CO.



Adara Salim  
8267 Hollywood Blvd.  
Los Angeles, CA 90069

Andrew J. Smith, Commander  
P.O. Box 30158  
Los Angeles, CA 90030

Andrew Stucker  
8630 Skyline Drive  
Los Angeles, CA 90046

Ashley Holt  
1430 N. C113 Harper Ave.  
West Hollywood, CA 90069

Billy Sorrentino  
9750 W. Sunset Blvd., Unit 206  
Los Angeles, CA 90046

c/o Jeanne McDonald, Attorney  
15760 Ventura Blvd., Suite 700  
Encino, CA 90046

Chris T. Wood  
7320 Hawthorne Ave, Unit 205  
Los Angeles, CA 90046

Craig Clark  
8082 Selma Ave.  
Los Angeles, CA 90046

Dave Singleton, Program Analyst  
1550 Harbor Blvd.  
West Sacramento, CA 95691

Dawn Rudling  
8082 Selma Ave.  
Los Angeles, CA 90046

Adrian Fine  
Director of Advocacy  
523 W. 6<sup>th</sup> St., Suite 826  
Los Angeles, CA 90014

Andrew Landis  
1351 N. Crescent Heights Blvd.,  
Unit 117  
West Hollywood, CA 90069

Angelo Graham  
8230 Hollywood Blvd.  
West Hollywood, CA 90046

Audra Boran  
1425 N. Crescent Heights  
Los Angeles, CA 90046

Brad Fielder  
1425 N. Crescent Heights Blvd.  
West Hollywood, CA 90046

Cathy Wayne  
8666 Lookout Mountain LA9  
Los Angeles, CA 90046

Christopher Rice  
1424 N. Crescent Heights Blvd.  
West Hollywood, CA 90046

Daniel Goldman  
1524 Courtney Ave.  
Los Angeles, CA 90046

David Gold  
8707 St. Ives Drive  
Los Angeles, CA 90069

Devon Brooks  
669 W. 34<sup>th</sup> St., Montgomery Ross  
Fisher Building, Room 307  
Los Angeles, CA 90089

Alexandra Rose  
8291 Presson Place  
Los Angeles, CA 90069

Andrew McPherson  
8278 Hollywood Blvd.  
Los Angeles, CA 90069

Anne Gagen  
6603 Whitley Terrace  
Los Angeles, CA 90068

Bill McBride  
8150 Sunset  
Los Angeles, CA 90046

Brad Ungar  
1425 N. Crescent Heights Blvd.  
West Hollywood, CA 90046

Chris Becker  
1720 N. Fuller Ave., #544  
Los Angeles, CA 90046

Clara Denson  
1435 Hayvenhurst Drive #105  
West Hollywood, CA 90046

Darren Ha  
3403 Twin Avenue  
Rosemead, CA 91770

David Mikael  
1425 N. Crescent Heights Blvd.  
West Hollywood, CA 90046

Diane Cary and James D. Parriott  
8235 Lincoln Terrace  
Los Angeles, CA 90069



Diane Connors  
1351 N. Crescent Heights  
West Hollywood, CA 90046

Eileen Kim  
447 N. Stanley Ave.  
Los Angeles, CA 90036

Emma Sands-Milsom  
813 N. Sweetzer Ave.  
West Hollywood, CA 90069

Gary Grossman  
1412½ Hayvenhurst Drive  
West Hollywood, CA 90046

Grafton Tanquary, Member  
1287 N. Crescent Heights Blvd.  
West Hollywood, CA 90046

Ian MacMillan, Program Supervisor  
21865 Copley Drive  
Diamond Bar, CA 91765

Jackie Vanka  
1425 N. Crescent Heights Blvd.  
Los Angeles, CA 90046

Janet Stredicke  
1351 N. Crescent Heights #103  
West Hollywood, CA 90046

Jay Jasper  
1351 N. Crescent Heights Blvd.,  
Unit 108  
West Hollywood, CA 90046

Joanna Parol  
8287 Marmont Lane  
Los Angeles, CA 90069

Dietrich Nelson  
2359 Nichols Canyon Road  
Los Angeles, CA 90046

Eliza Congdon and Adam Cherney  
1425 N. Crescent Heights Blvd.  
West Hollywood, CA 90046

Eva Ballo  
2773 Woodstock Road  
Los Angeles, CA 90046

Gary Thomson  
8254 Hollywood Blvd.  
West Hollywood, CA 90046

Greg Widen  
8267 Hollywood Blvd.  
Los Angeles, CA 90069

J. Martin  
PO Box 16056  
Beverly Hills, CA 90209

James and Amy McAndrew  
1425 N. Crescent Heights Blvd.  
West Hollywood, CA 90046

Jason Grant  
12100 W. Olympic Blvd., Suite 350  
Los Angeles, CA 90064

Jay Luchs  
1218 N. Wetherly Drive  
Los Angeles, CA 90069

Joanne Steuer  
1555 N. Ogden Drive  
Los Angeles, CA 90046

Ebon Alabastur  
1344 Hayvenhurst Drive  
West Hollywood, CA 90046

Elizabeth Gross  
2577¼ N. North Beachwood Drive  
Los Angeles, CA 90068

Gary DePew  
1351 N. Crescent Heights Blvd.  
Los Angeles, CA 90046

George Abrahams  
3150 Durand Drive  
Los Angeles, CA 90068

Hilary Grosser  
8665 Burton Way  
Los Angeles, CA 90048

Jack Ravan  
8322 Beverly Blvd., Suite 301  
Los Angeles, CA 90048

Jamie Hall, Board Member-Land Use  
8453 Kirkwood Drive  
Los Angeles, CA 90046

Jay Grodin  
8288 Hollywood Blvd.  
Los Angeles, CA 90069

Jeanne McDonald, Esq.  
17650 Ventura Blvd. #700  
Los Angeles, CA 91436

John Bollard  
8292 Marmont Lane  
Los Angeles, CA 90069

John Monsour  
2062 Stanley Hills Drive  
Los Angeles, CA 90046

Jonathon Komack Martin  
1416 Hayvenhurst Drive  
West Hollywood, CA 90046

Julie Summers  
1425 N. Crescent Height Blvd.,  
Unit 307  
West Hollywood, CA 90046

Kate Nevels  
540 N. Croft Ave.  
Los Angeles, CA 90048

Liza Amtmanis  
8028 Selma Ave.  
Los Angeles, CA 90046

Marian Dodge, President  
P.O. Box 27404  
Los Angeles, CA 90027

Mary Jean Trayne  
1409 N. Hayvenhurst Drive, Unit 8  
West Hollywood, CA 90046

Michael Schwartz  
1521 N. Sierra Bonita Ave.  
Los Angeles, CA 90046

Nick Saponara,  
Development Review Manager  
One Gateway Plaza  
Los Angeles, CA 90012

Phyllis Present  
7839 Electra Drive  
Los Angeles, CA 90046

Jon Frishman  
8571 Walnut Drive  
Los Angeles, CA 90046

Joyce Dillard  
P.O. Box 31377  
Los Angeles, CA 90031-0377

Karen deMille Kennedy  
1351 N. Crescent Heights Blvd.,  
Unit 106  
West Hollywood, CA 90046

Kathy Small  
1416 Hayvenhurst  
West Hollywood, CA 90046

Lydia Lowry  
1041 N. Spaulding Ave.  
West Hollywood, CA 90046

Mark Lynn  
13700 Marina Point Drive, #1126  
Los Angeles, CA 90292

Mary Kiser  
1409 N. Hayvenhurst Drive  
West Hollywood, CA 90046

Mike Insidioso  
306 Monte Vista Ave  
Costa Mesa, CA 92627

Olanna Taskey  
8359 Hollywood Blvd.  
Los Angeles, CA 90069

Randy Dodge  
2175 Stanley Hills Drive  
Los Angeles, CA 90046

Jonathan  
8721 Santa Monica Blvd.  
West Hollywood, CA 90046

Joyce Eliason  
1416 Hayvenhurst Drive  
West Hollywood, CA 90046

Karri Bowman  
1425 N. Crescent Heights Blvd.  
Los Angeles, CA 90046

Leslie Monsour, Representative  
2062 Stanley Hills Drive  
Los Angeles, CA 90046

Lynn Russell  
1360 N. Crescent Heights Blvd.,  
Suite 6-C  
Los Angeles, CA 90046

Martin Turnbull  
1045 N. Kings Road, #110  
West Hollywood, CA 90069

Michael Peretzian  
2235 Nichols Canyon Road  
Los Angeles, CA 90046

Naidra Thomson  
1351 N. Crescent Heights Blvd.,  
Unit 111  
West Hollywood, CA 90046

Patrick Frank  
1622 Crescent Place  
Venice, CA 90291

Randy Soref  
8250 Woodhill Trail  
Los Angeles, CA 90069

Resident  
2410 Nichols Canyon Road  
Los Angeles, CA 90046

Rory Barish  
1416 Hayvenhurst Drive #1E  
West Hollywood, CA 90046

Scott Luecke  
1435 Hayvenhurst Drive, Unit 305  
West Hollywood, CA 90069

Scott Stevens  
927 N. Crescent Heights Blvd.  
Los Angeles, CA 90046

Shannon Donnan  
8601 Wonderland Avenue  
Los Angeles, CA 90046

Spencer Villasenor  
540 N. Croft Ave., Unit 4  
Los Angeles, CA 90048

Stefen Liberti  
1425 N. Crescent Heights Blvd.  
Los Angeles, CA 90046

Susan H. Cuscuna  
8938 Holly Place  
Los Angeles, CA 90046

Vera Conniff  
P.O. Box 46395  
Los Angeles, CA 90046

Yoshikp Rabin  
1861 N. Crescent Heights  
Los Angeles, CA 90069

Robert Hofler  
1471 N. Hayvenhurst Drive  
Los Angeles, CA 90046

Sarit Freiberg  
1351 N. Crescent Heights Blvd.,  
Unit 203  
West Hollywood, CA 90046

Scott Lunceford, Contract Planner  
8300 Santa Monica Blvd.  
West Hollywood, CA 90069

Sean Knecht  
11525 Ohio Ave. #3  
Los Angeles, CA 90025

Sharon Donnan  
8601 Wonderland Ave.  
Los Angeles, CA 90046

Stacey Kenyon  
1537 N. Laurel Ave.  
Los Angeles, CA 90046

Stephen Yoder, Owner  
1415-1421½ Hayvenhurst Drive  
West Hollywood, CA 90046

Tom Moore  
8283 Hollywood Blvd.  
Los Angeles, CA 90069

Wayne Marmorstein  
1861 N. Crescent Heights Blvd.  
Los Angeles, CA 90069

Dave Kim  
8158 West Sunset  
Los Angeles, CA 90046

Robert Silverstein  
215 N. Marengo Ave., 3<sup>rd</sup> Floor  
Pasadena, CA 91101-1504

Save Sunset Boulevard Inc.  
7985 Santa Monica Blvd., Suite 312  
West Hollywood, CA 90046

Scott Morgan, Director  
1400 10<sup>th</sup> Street  
Sacramento, CA 95812

Serena Reid  
8030 Selma Ave.  
Los Angeles, CA 90046

Sheri Lin, Owner  
1328 Hayvenhurst Drive  
West Hollywood, CA 90046

Stan Berkman  
1691 N. Crescent Heights Blvd.  
Los Angeles, CA 90069

Susan Dynner  
1425 N. Crescent Heights  
Los Angeles, CA 90046

Tony Tucci  
PO Box 5976  
Beverly Hills, CA 90209

Wendy Kneedler  
1515 N. Ogden Drive  
Los Angeles, CA 90046

DEPARTMENT OF  
**CITY PLANNING**  
200 N. SPRING STREET, ROOM 525  
LOS ANGELES, CA 90012-4801  
AND  
6262 VAN NUYS BLVD., SUITE 351  
VAN NUYS, CA 91401

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MARTA SEGURA

JAMES K. WILLIAMS  
COMMISSION EXECUTIVE ASSISTANT II  
(213) 978-1300

**CITY OF LOS ANGELES**  
CALIFORNIA



ERIC GARCETTI  
MAYOR

**EXECUTIVE OFFICES**

MICHAEL J. LOGRANDE  
DIRECTOR  
(213) 978-1271

ALAN BELL, AICP  
DEPUTY DIRECTOR  
(213) 978-1272

LISA M. WEBBER, AICP  
DEPUTY DIRECTOR  
(213) 978-1274

JAN ZATORSKI  
DEPUTY DIRECTOR  
(213) 978-1273

FAX: (213) 978-1275

INFORMATION  
[www.planning.lacity.org](http://www.planning.lacity.org)

**May 16, 2014**

**NOTICE OF ENVIRONMENTAL LEADERSHIP DEVELOPMENT PROJECT (ELDP)**

<b><u>CASE NO.:</u></b>	ENV-2013-2552-EIR
<b><u>PROJECT NAME:</u></b>	8150 Sunset Boulevard Mixed-Use Project
<b><u>PROJECT APPLICANT:</u></b>	AG-SCH 8150 Sunset Boulevard Owner, L.P.
<b><u>PROJECT LOCATION/ADDRESS:</u></b>	8150 Sunset Boulevard
<b><u>COMMUNITY PLANNING AREA:</u></b>	Hollywood Community Plan Area
<b><u>COUNCIL DISTRICT:</u></b>	4 – Tom LaBonge

THE APPLICANT HAS ELECTED TO PROCEED UNDER CHAPTER 6.5 (COMMENCING WITH SECTION 21178) OF THE PUBLIC RESOURCES CODE, WHICH PROVIDES, AMONG OTHER THINGS, THAT ANY JUDICIAL ACTION CHALLENGING THE CERTIFICATION OF THE EIR OR THE APPROVAL OF THE PROJECT DESCRIBED IN THE EIR IS SUBJECT TO THE PROCEDURES SET FORTH IN SECTIONS 21185 TO 21186, INCLUSIVE, OF THE PUBLIC RESOURCES CODE. A COPY OF CHAPTER 6.5 (COMMENCING WITH SECTION 21178) OF THE PUBLIC RESOURCES CODE IS INCLUDED BELOW.

PUBLIC RESOURCES CODE - PRC  
DIVISION 13. ENVIRONMENTAL QUALITY [21000 - 21189.3]  
(Division 13 added by Stats. 1970, Ch. 1433.)

CHAPTER 6.5. Jobs and Economic Improvement Through Environmental Leadership Act of 2011 [21178 - 21189.3] (Chapter 6.5 added by Stats. 2011, Ch. 354, Sec. 1.)

21178. The Legislature finds and declares all of the following:

- (a) The overall unemployment rate in California is 12 percent, and in certain regions of the state that rate exceeds 13 percent.
- (b) The California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code) requires that the environmental impacts of development projects be identified and mitigated.
- (c) The act also guarantees the public an opportunity to review and comment on the environmental impacts of a project and to participate meaningfully in the development of mitigation measures for potentially significant environmental impacts.

- (d) There are large projects under consideration in various regions of the state that would replace old and outmoded facilities with new job-creating facilities to meet those regions' needs while also establishing new, cutting-edge environmental benefits to those regions.
- (e) These projects are privately financed or financed from revenues generated from the projects themselves and do not require taxpayer financing.
- (f) These projects further will generate thousands of full-time jobs during construction and thousands of additional permanent jobs once they are constructed and operating.
- (g) These projects also present an unprecedented opportunity to implement nation-leading innovative measures that will significantly reduce traffic, air quality, and other significant environmental impacts, and fully mitigate the greenhouse gas emissions resulting from passenger vehicle trips attributed to the project.
- (h) These pollution reductions will be the best in the nation compared to other comparable projects in the United States.
- (i) The purpose of this act is to provide unique and unprecedented streamlining benefits under the California Environmental Quality Act for projects that provide the benefits described above for a limited period of time to put people to work as soon as possible.

21180. For the purposes of this chapter, the following terms shall have the following meanings:

- (a) "Applicant" means a public or private entity or its affiliates, or a person or entity that undertakes a public works project, that proposes a project and its successors, heirs, and assignees.
- (b) "Environmental leadership development project," "leadership project," or "project" means a project as described in Section 21065 that is one the following:
  - (1) A residential, retail, commercial, sports, cultural, entertainment, or recreational use project that is certified as LEED silver or better by the United States Green Building Council and, where applicable, that achieves a 10-percent greater standard for transportation efficiency than for comparable projects. These projects must be located on an infill site. For a project that is within a metropolitan planning organization for which a sustainable communities strategy or alternative planning strategy is in effect, the infill project shall be consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, for which the State Air Resources Board, pursuant to subparagraph (H) of paragraph (2) of subdivision (b) of Section 65080 of the Government Code, has accepted a metropolitan planning organization's determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets.
  - (2) A clean renewable energy project that generates electricity exclusively through wind or solar, but not including waste incineration or conversion.
  - (3) A clean energy manufacturing project that manufactures products, equipment, or components used for renewable energy generation, energy efficiency, or for the production of clean alternative fuel vehicles.
- (c) "Transportation efficiency" means the number of vehicle trips by employees, visitors, or customers of the residential, retail, commercial, sports, cultural, entertainment, or recreational use project divided by the total number of employees, visitors, and customers.

21181. This chapter does not apply to a project if the Governor does not certify a project as an environmental leadership development project eligible for streamlining provided pursuant to this chapter prior to January 1, 2016.

21182. A person proposing to construct a leadership project may apply to the Governor for certification that the leadership project is eligible for streamlining provided by this chapter. The



person shall supply evidence and materials that the Governor deems necessary to make a decision on the application. Any evidence or materials shall be made available to the public at least 15 days before the Governor certifies a project pursuant to this chapter.

21183. The Governor may certify a leadership project for streamlining pursuant to this chapter if all the following conditions are met:

(a) The project will result in a minimum investment of one hundred million dollars (\$100,000,000) in California upon completion of construction.

(b) The project creates high-wage, highly skilled jobs that pay prevailing wages and living wages and provide construction jobs and permanent jobs for Californians, and helps reduce unemployment. For purposes of this subdivision, "jobs that pay prevailing wages" means that all construction workers employed in the execution of the project will receive at least the general prevailing rate of per diem wages for the type of work and geographic area, as determined by the Director of Industrial Relations pursuant to Sections 1773 and 1773.9 of the Labor Code. If the project is certified for streamlining, the project applicant shall include this requirement in all contracts for the performance of the work.

(c) The project does not result in any net additional emission of greenhouse gases, including greenhouse gas emissions from employee transportation, as determined by the State Air Resources Board pursuant to Division 25.5 (commencing with Section 38500) of the Health and Safety Code.

(d) The project applicant has entered into a binding and enforceable agreement that all mitigation measures required pursuant to this division to certify the project under this chapter shall be conditions of approval of the project, and those conditions will be fully enforceable by the lead agency or another agency designated by the lead agency. In the case of environmental mitigation measures, the applicant agrees, as an ongoing obligation, that those measures will be monitored and enforced by the lead agency for the life of the obligation.

(e) The project applicant agrees to pay the costs of the Court of Appeal in hearing and deciding any case, including payment of the costs for the appointment of a special master if deemed appropriate by the court, in a form and manner specified by the Judicial Council, as provided in the Rules of Court adopted by the Judicial Council pursuant to subdivision (f) of Section 21185.

(f) The project applicant agrees to pay the costs of preparing the administrative record for the project concurrent with review and consideration of the project pursuant to this division, in a form and manner specified by the lead agency for the project.

21184. (a) The Governor may certify a project for streamlining pursuant to this chapter if it complies with the conditions specified in Section 21183.

(b) (1) Prior to certifying a project, the Governor shall make a determination that each of the conditions specified in Section 21183 has been met. These findings are not subject to judicial review.

(2) (A) If the Governor determines that a leadership project is eligible for streamlining pursuant to this chapter, he or she shall submit that determination, and any supporting information, to the Joint Legislative Budget Committee for review and concurrence or nonconcurrence.

(B) Within 30 days of receiving the determination, the Joint Legislative Budget Committee shall concur or nonconcur in writing on the determination.

(C) If the Joint Legislative Budget Committee fails to concur or nonconcur on a determination by the Governor within 30 days of the submittal, the leadership project is deemed to be certified.

(c) The Governor may issue guidelines regarding application and certification of projects pursuant to this chapter. Any guidelines issued pursuant to this subdivision are not subject to the rulemaking provisions of the Administrative Procedure Act (Chapter 3.5 (commencing with Section 11340) of Part 1 of Division 3 of Title 2 of the Government Code).

21185. On or before July 1, 2014, the Judicial Council shall adopt a rule of court to establish procedures applicable to actions or proceedings brought to attack, review, set aside, void, or annul the certification of the environmental impact report for an environmental leadership development project certified by the Governor pursuant to this chapter or the granting of any project approvals that require the actions or proceedings, including any potential appeals therefrom, be resolved, within 270 days of certification of the record of proceedings pursuant to Section 21186.

21186. Notwithstanding any other law, the preparation and certification of the administrative record for a leadership project certified by the Governor shall be performed in the following manner:

(a) The lead agency for the project shall prepare the administrative record pursuant to this division concurrently with the administrative process.

(b) All documents and other materials placed in the administrative record shall be posted on, and be downloadable from, an Internet Web site maintained by the lead agency commencing with the date of the release of the draft environmental impact report.

(c) The lead agency shall make available to the public in a readily accessible electronic format the draft environmental impact report and all other documents submitted to, or relied on by, the lead agency in the preparation of the draft environmental impact report.

(d) A document prepared by the lead agency or submitted by the applicant after the date of the release of the draft environmental impact report that is a part of the record of the proceedings shall be made available to the public in a readily accessible electronic format within five business days after the document is released or received by the lead agency.

(e) The lead agency shall encourage written comments on the project to be submitted in a readily accessible electronic format, and shall make any comment available to the public in a readily accessible electronic format within five days of its receipt.

(f) Within seven business days after the receipt of any comment that is not in an electronic format, the lead agency shall convert that comment into a readily accessible electronic format and make it available to the public in that format.

(g) Notwithstanding paragraphs (b) to (f), inclusive, documents submitted to or relied on by the lead agency that were not prepared specifically for the project and are copyright protected are not required to be made readily accessible in an electronic format. For those copyright-protected documents, the lead agency shall make an index of these documents available in an electronic format no later than the date of the release of the draft environmental impact report, or within five business days if the document is received or relied on by the lead agency after the release of the draft environmental impact report. The index must specify the libraries or lead agency offices in which hardcopies of the copyrighted materials are available for public review.

(h) The lead agency shall certify the final administrative record within five days of its approval of the project.

(i) Any dispute arising from the administrative record shall be resolved by the superior court. Unless the superior court directs otherwise, a party disputing the content of the record shall file a motion to augment the record at the time it files its initial brief.

(j) The contents of the record of proceedings shall be as set forth in subdivision (e) of Section 21167.6.

21187. Within 10 days of the Governor certifying an environmental leadership development project pursuant to this section, the lead agency shall, at the applicant's expense, issue a public notice in no less than 12-point type stating the following:

"THE APPLICANT HAS ELECTED TO PROCEED UNDER CHAPTER 6.5 (COMMENCING WITH SECTION 21178) OF THE PUBLIC RESOURCES CODE, WHICH PROVIDES, AMONG OTHER THINGS, THAT ANY JUDICIAL ACTION CHALLENGING THE CERTIFICATION OF THE EIR OR THE APPROVAL OF THE PROJECT DESCRIBED IN THE EIR IS SUBJECT TO THE PROCEDURES SET FORTH IN SECTIONS 21185 TO 21186, INCLUSIVE, OF THE PUBLIC RESOURCES CODE. A COPY OF CHAPTER 6.5 (COMMENCING WITH SECTION 21178) OF THE PUBLIC RESOURCES CODE IS INCLUDED BELOW."

The public notice shall be distributed by the lead agency as required for public notices issued pursuant to paragraph (3) of subdivision (b) of Section 21092.

21188. The provisions of this chapter are severable. If any provision of this chapter or its application is held to be invalid, that invalidity shall not affect any other provision or application that can be given effect without the invalid provision or application.

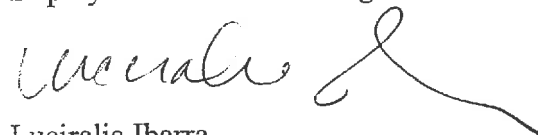
21189. Except as otherwise provided expressly in this chapter, nothing in this chapter affects the duty of any party to comply with this division.

21189.1. If, prior to January 1, 2016, a lead agency fails to approve a project certified by the Governor pursuant to this chapter, then the certification expires and is no longer valid.

21189.2. The Judicial Council shall report to the Legislature on or before January 1, 2015, on the effects of this chapter, which shall include, but not be limited to, a description of the benefits, costs, and detriments of the certification of leadership projects pursuant to this chapter.

21189.3. This chapter shall remain in effect until January 1, 2017, and as of that date is repealed unless a later enacted statute extends or repeals that date.

Lisa M. Webber,  
Deputy Director of Planning

A handwritten signature in dark ink, appearing to read 'Luciralia Ibarra', with a long, sweeping horizontal line extending to the right.

Luciralia Ibarra  
Project Coordinator



Luciralia Ibarra <Luciralia.ibarra@lacity.org>

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## FW: E-Sheet Notification - Marathon Communications (LAT)

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**Gabe Kramer** <gkramer@marathon-com.com>

Mon, May 19, 2014 at 12:18 PM

To: Luciralia Ibarra <Luciralia.ibarra@lacity.org>

Cc: "Nytzen, Michael" <michaelnytzen@paulhastings.com>

Hi Luci,

Below is confirmation of the print posting for the ELP notification that ran this past Saturday.

Regards,

Gabe

—Original Message—

From: esheets@esheets-merlinone.com [mailto:esheets@esheets-merlinone.com]

Sent: Saturday, May 17, 2014 5:09 AM

To: Gabe Kramer

Subject: E-Sheet Notification - Marathon Communications (LAT)

Good Morning! This email will allow you access to the Los Angeles Times electronic tearsheet program. Click on the link below for publication confirmation and tearsheet of the ad placed in today's newspaper.

<http://tearsheets.latimes.com/scripts/foxisapi.dll/sur.x.go?dFib29xRMf>

Los Angeles Times:

05/17/2014:

Marathon Communications / CU00297860 / CASE NO.: ENV-2013-2552-EIR

Thank You.

**Search** Results Ad Search: **Pub Date: On: 05/17/2014 or Input on 05/17/2014 • Advertiser Account: CU00297860**[Legal](#)**Los Angeles Times**[Contact](#)**E-Sheets®** by **MerlinOne**Hits: ☐ ☐ 1 to 2 ☐ ☐ of 2

<u>Date</u>	<u>Section</u>	<u>Page</u>	<u>Zone</u>	<u>Size</u>	<u>Insertion #</u>	<u>Ad #</u>	<u>Description</u>	<u>Advertiser</u>	<u>Agency</u>
2014/05/17	Legal	B005	WEST	6.0 x 1.0		<u>2393288-1</u>	CASE NO.: ENV-2013-2552-EIR	Marathon Communications	
2014/05/17	Legal	B005	EAST	6.0 x 1.0		<u>2393288-1</u>	CASE NO.: ENV-2013-2552-EIR	Marathon Communications	

Hits: ☐ ☐ 1 to 2 ☐ ☐ of 2



Luciralia Ibarra &lt;Luciralia.ibarra@lacity.org&gt;

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## Certificate of Posting

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**Gabe Kramer** <gkramer@marathon-com.com>

Fri, May 16, 2014 at 4:57 PM

To: Luciralia Ibarra &lt;Luciralia.ibarra@lacity.org&gt;

Cc: "Nytzen, Michael" &lt;michaelnytzen@paulhastings.com&gt;

And pictures, attached.

Thanks,

Gabe

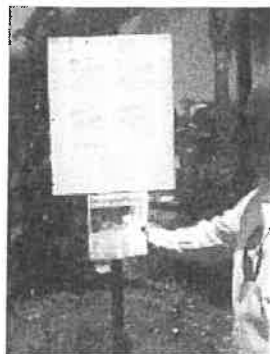
Please note our new address below

---

**Gabriel Kramer** | AssociateMarathon Communications | 5900 Wilshire Boulevard, Suite 1550, Los Angeles, CA, 90036 | Main:  
323.655.4660 | Fax: 323.655.6478 | gkramer@marathon-com.com | www.marathon-com.com

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### 5 attachments



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1110K



**IMG\_5242.jpeg**  
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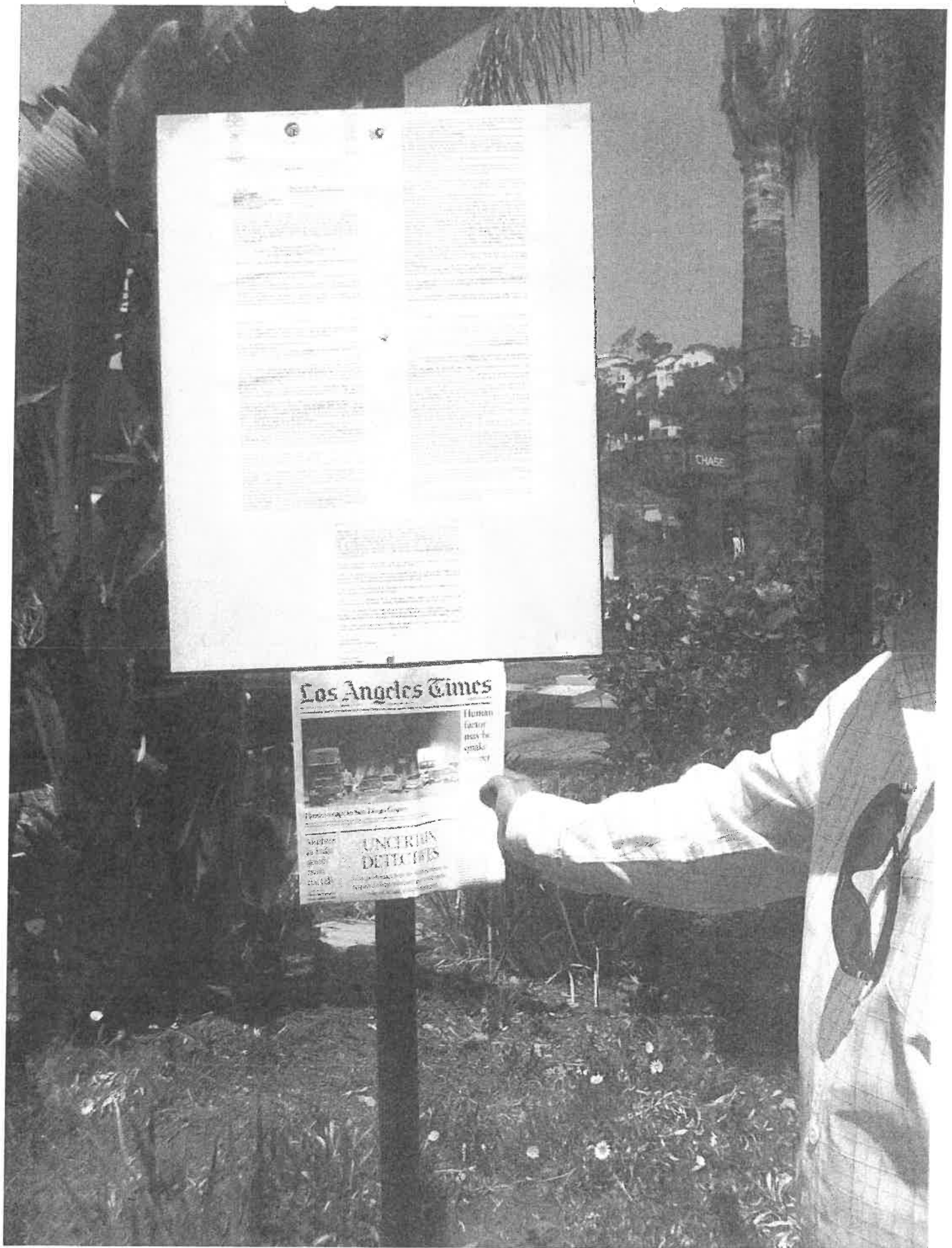


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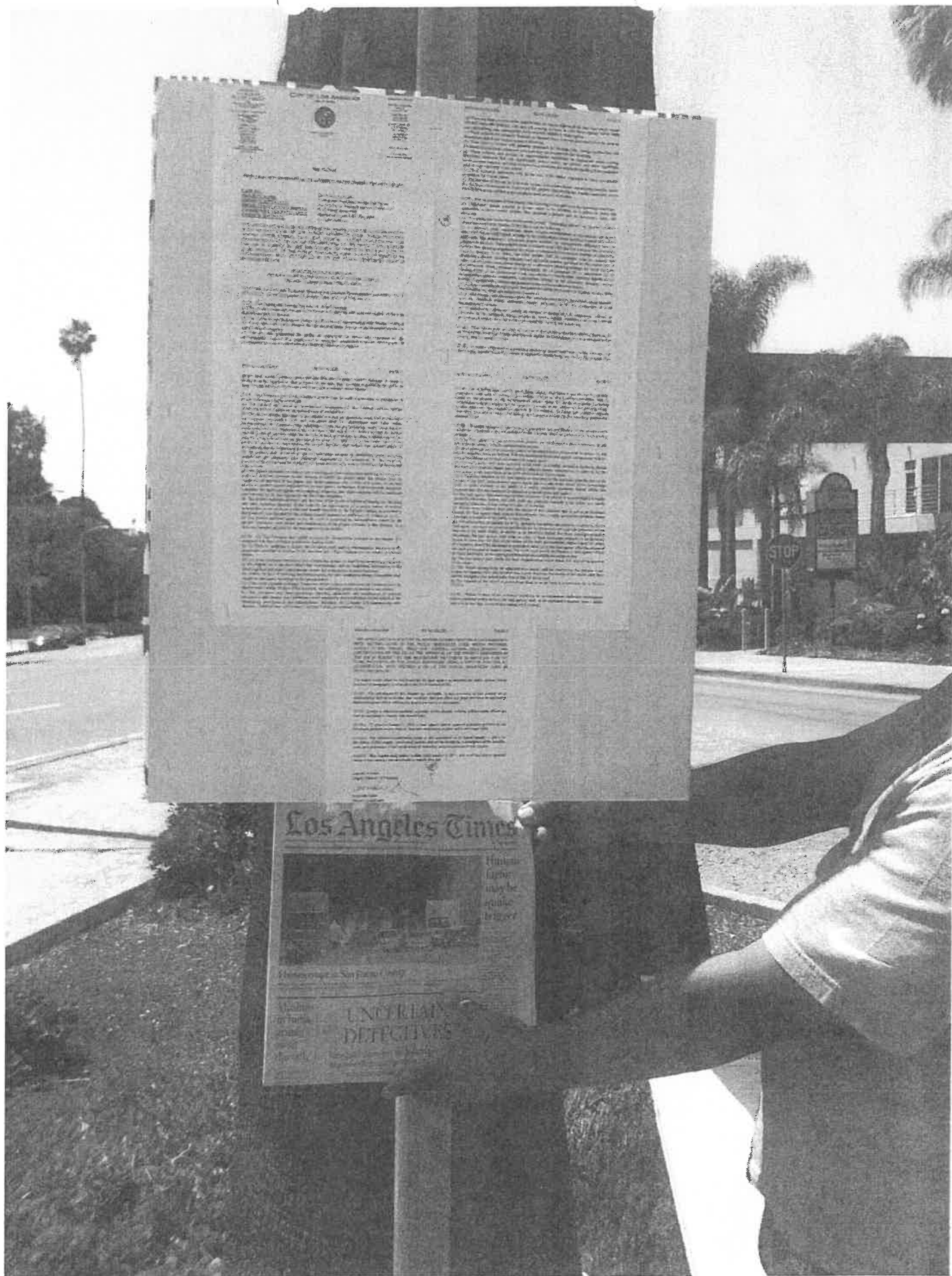


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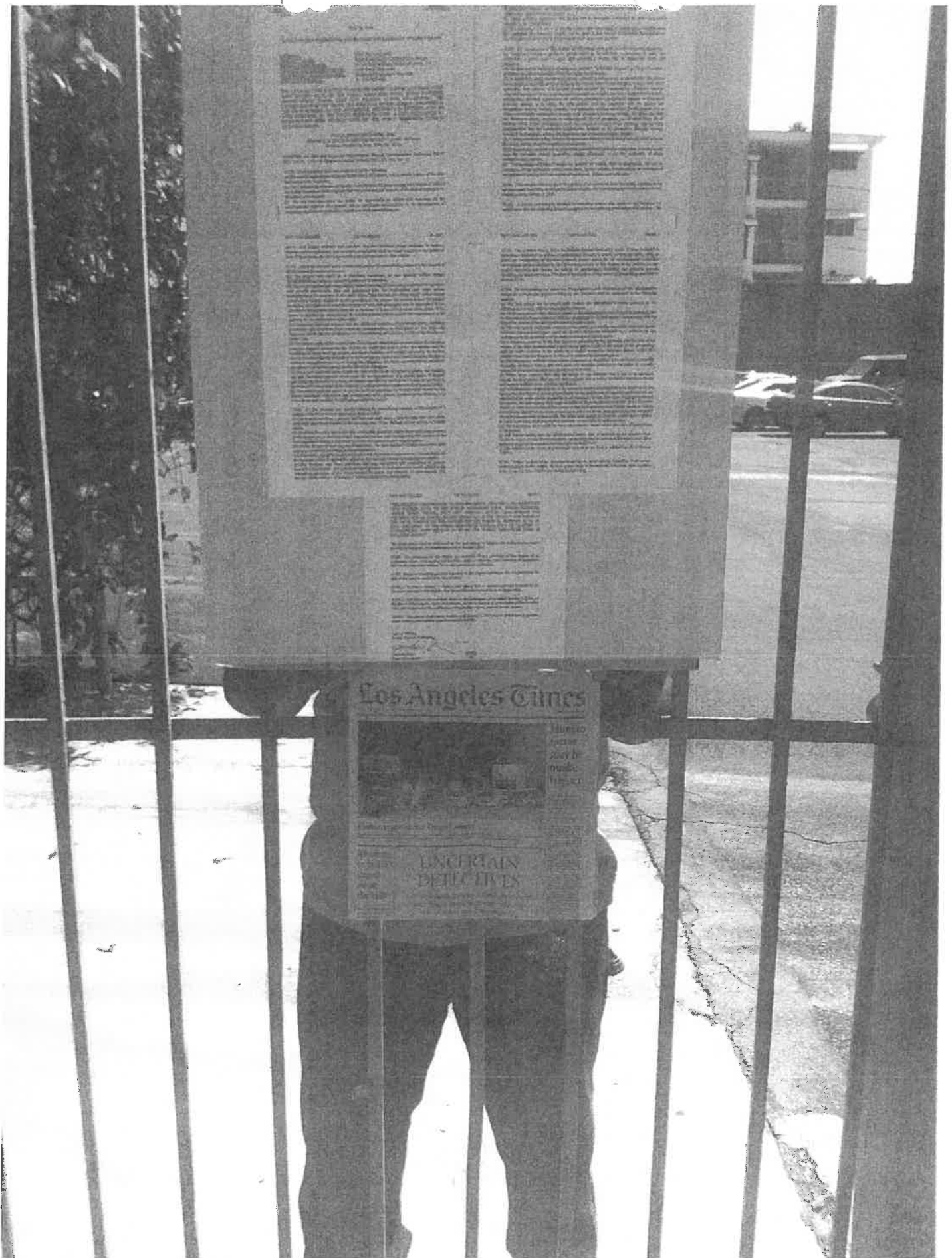












# Joint Legislative Budget Committee

CHAIR  
**MARK LENO**

VICE CHAIR  
**NANCY SKINNER**

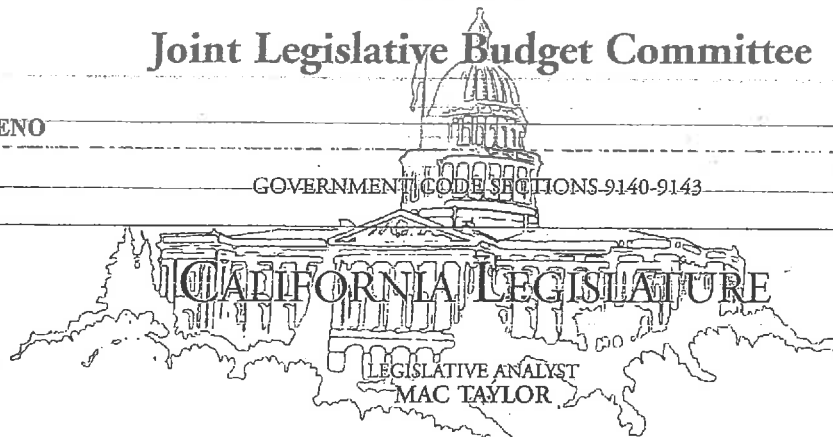
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JEAN FULLER  
ALEX PADILLA  
RICHARD ROTH  
MIMI WALTERS  
LOIS WOLK  
VACANT

GOVERNMENT CODE SECTIONS 9140-9143

## ASSEMBLY

ROCKY CHÁVEZ  
WESLEY CHESBRO  
MIKE GATTO  
JEFF GORELL  
DIANE L. HARKEY  
REGINALD B. JONES-SAWYER  
VACANT



May 8, 2014

925 L STREET, SUITE 1000  
SACRAMENTO, CALIFORNIA 95814  
(916) 445-4656

Ken Alex, Director  
Governor's Office of Planning and Research  
State of California  
1400 Tenth Street  
Sacramento, CA 95814

Dear Mr. Alex:

On April 8, 2014, you informed me that Governor Brown has determined that the 8150 Sunset Boulevard project in Los Angeles County is eligible for streamlined judicial review for CEQA compliance under the Jobs and Economic Improvement Act of 2011 (AB 900).

AB 900 (Buchanan), Chapter 354, Statutes of 2011, was intended to encourage California's economic recovery by providing a streamlined CEQA review process for construction projects that qualify as an environmental leadership development project. While projects that meet the criteria set forth in AB 900 are eligible for streamlined CEQA review, it does not alter the requirements a project must meet under CEQA; diminish the ability of project opponents to raise issues or file actions under CEQA; or change the standards a court must consider in reviewing CEQA plans. All the rights and remedies available to parties to challenge a project are expressly protected under AB 900.

The Legislative Analyst's Office (LAO) has reviewed the project on behalf of the Joint Legislative Budget Committee and advises me that the project "aligns with the intent of AB 900". I have attached their analysis for your review.

Based on the information you have provided, and the subsequent review by the LAO, I do not object to your determination that this project meets the criteria set forth in Public Resources Code § 21178 et seq. However, I have received a number of communications in opposition to this project and I am forwarding those to you for your review.

Sincerely,

  
Mark Leno  
Chair

cc: Members of the Joint Legislative Budget Committee

Attachments



May 1, 2014

Hon. Mark Leno, Chair  
Joint Legislative Budget Committee  
Room 5100, State Capitol  
Sacramento, California 95814

Dear Senator Leno:

On April 8, 2014, the Office of Planning and Research notified you of the Governor's determination that the 8150 Sunset Project is eligible for the alternative California Environmental Quality Act (CEQA) review process authorized by Chapter 354, Statutes of 2011 (AB 900, Buchanan). Under AB 900, the Joint Legislative Budget Committee (JLBC) has 30 days to concur or not concur with the Governor's determination. As we discuss below, we think the 8150 Sunset Project aligns with the intent of AB 900, and we recommend that you concur with the Governor's determination.

### **Background**

**Summary of AB 900.** Assembly Bill 900 authorizes the Governor to review and certify submitted development projects for a streamlined judicial review process for CEQA compliance. This process is intended to allow projects to begin construction sooner by requiring that any legal challenge of a project's CEQA certification be referred to the state Court of Appeal and resolved within 175 days. In order to qualify for AB 900's alternative CEQA process, a project must meet a series of criteria outlined in the statute. For example, any project under AB 900 must result in a minimum investment of \$100 million, create high-wage jobs, and not result in net additional greenhouse gas (GHG) emissions, as determined by the California Air Resources Board (ARB). Additionally, a residential and/or commercial project—such as the proposed project—must meet additional requirements. Specifically, it must be located on an infill site, be designed to achieve Leadership in Energy & Environmental Design (LEED) silver certification, be consistent with the relevant regional sustainable communities strategy (SCS), and exceed by at least 10 percent the transportation efficiency for comparable projects.

**Description of Proposed Project.** The proposed 8150 Sunset Project is a mixed-use infill project. The project is proposed for a 2.56 acre site in the Hollywood area within the city of Los Angeles that is currently developed with roughly 80,000 square feet of commercial space. The proposed project would demolish this existing development and replace it with roughly 222,000 square feet of residential space (249 units) and 111,000 square feet of commercial space. The lead agency for the project is the city of Los Angeles and the estimated total project cost is \$200 million.

Legislative Analyst's Office  
California Legislature  
Mac Taylor • Legislative Analyst  
925 L Street, Suite 1000 • Sacramento CA 95814  
(916) 445-4656 • FAX 324-4281

**Analyst's Comments**

The Governor certified that the 8150 Sunset Project meets AB 900's requirements and has provided supporting information to the JLBC. After reviewing these materials, we find that the project clearly meets many of the criteria set out in AB 900. Specifically, the supporting documents demonstrate that the project will result in greater than the minimum \$100 million investment, has received a determination from ARB that it will not result in any net additional GHG emissions, is on an infill site, and will be designed to achieve LEED silver certification.

We note, however, that some of the criteria in AB 900—job creation, SCS consistency, and transportation efficiency—are not clearly defined in the statute. As a result, while we believe the project is consistent with these requirements based on our interpretation of AB 900, it is possible that different reviewers could reach different conclusions. Thus, we discuss our understanding of these criteria and their application to this project below.

**Job Creation.** One condition of eligibility for the alternative CEQA process under AB 900 is that the "project creates high-wage, highly skilled jobs that pay prevailing wages and living wages and provide construction jobs and permanent jobs for Californians." This provision contains some requirements that the proposed project clearly meets. For example, the project will create construction jobs and the applicant has committed to paying prevailing wages. There is uncertainty, however, regarding how to interpret the requirement that the project generate permanent jobs. The applicant indicates that it expects the project to create over 300 jobs. However, it is difficult to verify this projection or determine with any certainty how many of these jobs would have existed without the project—for instance, within the existing development at the site or at nearby businesses. For that reason, consistent with our office's past practice, we interpret the statute to mean that the project must provide space for new permanent jobs (rather than the jobs themselves). Under that interpretation, we find that the project meets AB 900's permanent job requirements by creating roughly 30,000 square feet of additional commercial space (above the 80,000 square feet of commercial space that currently exists on the site).

**SCS.** Another condition of eligibility for the alternative CEQA process is that the project be consistent with the SCS covering the relevant region. In this case, the applicable SCS is the Southern California Association of Government's Regional Transportation Plan/SCS (SCAG's RTP/SCS). Since AB 900 does not specify how to determine consistency with the policies identified in the SCS, we interpret the statute as requiring that the project provide a reasonable justification for its consistency. The SCAG's RTP/SCS emphasizes goals and policies that encourage energy efficiency and promote land use and growth patterns that facilitate transit and non-motorized transportation. This project proposes an energy efficient design, includes transportation demand (TDM) programs to reduce vehicle trips, concentrates growth in an urban setting, and is located in an area with relatively robust transit service—characteristics that we believe are in keeping with the goals and policies of SCAG's RTP/SCS.

**Transportation Efficiency.** An additional condition for CEQA streamlining under AB 900 is that the project meet a 10 percent greater standard for transportation efficiency, meaning that the average number of vehicle trips by employees and visitors must be 10 percent less than that of a comparable facility. Assembly Bill 900 does not specify what data to use in measuring whether a project meets this level of transportation efficiency improvement or define the type of projects

that should be the basis of comparison. Accordingly, consistent with our office's past practice, we interpret this requirement to mean that the project must present a reasonable plan for achieving greater transportation efficiency than similar developments. The applicant indicates that, due to the project's location within a high-density and heavily developed area, the project is expected to benefit from high levels of "pass through traffic," which would reduce the vehicle trips it generates. Also, the applicant proposes various TDM programs, which are aimed at further reducing vehicle trips. Together, the applicant anticipates that these aspects of the project would enable it to reduce vehicle trips by roughly one-third compared to a mixed-use project in a suburban location without TDM. While not conclusive, we believe this represents a reasonable plan to reduce vehicle trips relative to other similar projects and thus aligns with AB 900's intent for greater transportation efficiency.

### Conclusion

In view of the above, we think the 8150 Sunset Project aligns with the intent of AB 900 and therefore recommend you concur with the Governor's determination.

If you have any questions about this analysis, please contact Helen Kerstein of my staff at (916) 319-8364 or [Helen.Kerstein@LAO.CA.GOV](mailto:Helen.Kerstein@LAO.CA.GOV).

Sincerely,



Anthony Simbol  
Deputy Legislative Analyst

cc: Members of the Joint Legislative Budget Committee





EDMOND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH



KEN ALEX  
DIRECTOR

April 8, 2014

Honorable Mark Leno, Chair  
Honorable Nancy Skinner, Vice-Chair  
Joint Legislative Budget Committee  
[add full address]  
Sacramento, CA 94249-0019

Re: 8150 Sunset, AB 900 Certified Project

Dear Senator Leno and Assemblywoman Skinner:

Governor Brown has determined that the 8150 Sunset Project in the City of Los Angeles is eligible for streamlined judicial review under the Jobs and Economic Improvement Act (AB 900), Public Resources Code section 21184. Pursuant to that provision, I am forwarding the Governor's determination to the Joint Legislative Budget Committee.

If you have any questions or comments, please do not hesitate to contact me or my staff.

Sincerely,

Ken Alex  
Director

**Executive Department**  
**State of California**

**GOVERNOR'S CERTIFICATION GRANTING STREAMLINING FOR THE 8150 SUNSET BLVD.  
PROJECT IN THE CITY OF LOS ANGELES**

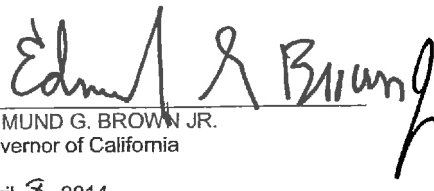
I, **EDMUND G. BROWN JR.**, Governor of the State of California, in accordance with the authority vested in me by the Jobs and Economic Improvement Act of 2011, Public Resources Code Sections 21178 et seq., make the following determinations:

The 8150 Sunset Blvd. Project, a \$200 million dollar mixed use residential/commercial redevelopment on a 2.56 acre site in Hollywood, will create new jobs, reduce energy usage and use clean energy, and promote infill development. A copy of the Project's Application, which contains information supporting this certification, is attached as Exhibit 1. All materials associated with this application are available online at [http://opr.ca.gov/s\\_californiajobs.php](http://opr.ca.gov/s_californiajobs.php).

1. Project Applicant: AG-SCH 8150 Sunset Boulevard Owner, L.P.
2. Project Description: A mixed use commercial/residential project located at 8150 Sunset Blvd., in Los Angeles, consisting of 249 apartment units (28 affordable housing) and 111,339 square feet of commercial retail and restaurant space in two buildings of 16 stories. The project will redevelop a 2.56 acre site on the Sunset Strip in Hollywood, and include a 9134 square foot public space and a 34,050 square foot central public plaza. Parking will be on site.
3. Lead Agency: City of Los Angeles
4. The project meets the criteria set forth in Public Resources Code section 21180(b)(1). It is
  - a. A mixed use residential/commercial project;
  - b. Designed to be eligible for LEED Silver certification;
  - c. Designed to achieve a 10-percent greater standard for transportation efficiency than for comparable projects (see Ex. 2); and
  - d. Located on an in-fill site.
5. The project is consistent with the Sustainable Communities Strategy for the Southern California region. (See Ex. 3.)
6. The size and scope of the project clearly establish that the project entails a minimum investment of \$100 million in California through the time of completion of construction.
7. The project applicant has provided information establishing that the prevailing and living wage requirements of Public Resources Code section 21183(b) will be satisfied. (See Ex. 1, pages 11-12.)
8. The project applicant has provided information establishing that the project will not result in any net additional greenhouse gas emissions, and the Deputy Executive Officer of the Air Resources Board has made the determination that the project does not result in any net additional greenhouse gas emissions. (See Application, and CARB Determination, dated March 27, 2014, attached as Ex. 4.)

9. The project applicant has provided documentation reflecting a binding agreement establishing the requirements set forth in Public Resources Code sections 21183(d), (e), and (f). (See Exhibit 5.) For this project, the applicant must ensure that the proposed travel demand management strategy (as set forth in the Project Application) is incorporated into the project or identified as mitigation for the project, and that the management strategy will be monitored and adjusted to ensure a ten percent reduction in motor vehicle trips.

Therefore, I hereby certify that the 8150 Sunset Blvd. Project is an eligible project under the Jobs and Economic improvement Act of 2011, Public Resources Code Sections 21178 et seq.

  
EDMUND G. BROWN JR.  
Governor of California

April 8, 2014



# Air Resources Board



**Matthew Rodriguez**  
Secretary for  
Environmental Protection

**Mary D. Nichols, Chairman**  
1001 I Street • P.O. Box 2815  
Sacramento, California 95812 • [www.arb.ca.gov](http://www.arb.ca.gov)

**Edmund G. Brown Jr.**  
Governor

March 27, 2014

Mr. Ken Alex, Director  
Office of Planning and Research  
Office of Governor Edmund G. Brown, Jr.  
State Capitol, First Floor  
Sacramento, California, 95814

Dear Mr. Alex:

Pursuant to Assembly Bill 900, the Governor may certify certain projects for streamlining under the California Environmental Quality Act if certain conditions are met. One condition for the Governor's certification is that a project does not result in any net additional emissions of greenhouse gases (GHG), including GHG emissions from employee transportation, as determined by the Air Resources Board (ARB).

On January 29, 2014, the applicant's representative for the project known as the 8150 Sunset Boulevard Mixed Use Project (Sunset Blvd. Project) submitted to ARB information regarding the GHG emission estimates for its proposed project in Los Angeles, California. ARB staff conducted an analysis of the baseline and project related emissions and concluded that the Sunset Blvd. Project will not result in any net additional GHG emissions relative to the baseline.

I have enclosed an ARB Executive Order documenting our determination. ARB staff's evaluation of the Sunset Blvd. Project is included in Attachment A and the documentation submitted by the applicant's representative is included in Attachment B.

If you have any questions regarding ARB's evaluation or determination, please contact Mr. Kurt Karperos, Chief, Air Quality Planning and Science Division at (916) 322-5350 or [kkapero@arb.ca.gov](mailto:kkapero@arb.ca.gov).

Sincerely,

Richard W. Corey  
Executive Officer

Enclosures

cc: Mr. Kurt Karperos, Chief  
Air Quality Planning and Science Division

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.*

California Environmental Protection Agency

Mr. Ken Alex, Director  
March 27, 2014  
Page 2

bcc: via email:

Christina Morkner-Brown, OLA  
Jon Taylor, AQPSD  
Joshua Cunningham, AQPSD  
Holger Sdun, AQPSD  
Terry Roberts, AQPSD

via hard copy:

EO Chron (2)  
AQPSD Chron

Assignment #9119 / #18462

X:\AB900\Sunset Blvd Mixed Use\ARB Determination\FINAL\Cover Letter to OPR

Enclosures:

X:\AB900\Sunset Blvd Mixed Use\ARB Determination\FINAL\EO for Sunset Blvd  
X:\AB900\Sunset Blvd Mixed Use\ARB Determination\FINAL\ARB Staff Evaluation  
X:\AB900\Sunset Blvd Mixed Use\ARB Determination\FINAL\Project Application

Sc# 20140110087



## Air Resources Board



Matthew Rodriguez  
Secretary for  
Environmental Protection

Mary D. Nichols, Chairman  
1001 I Street • P.O. Box 2815  
Sacramento, California 95812 • [www.arb.ca.gov](http://www.arb.ca.gov)

Edmund G. Brown Jr.  
Governor

February 6, 2010

RECEIVED

FEB 10 2014

STATE CLEARING HOUSE

Ms. Heidi Rous  
Vice President/Director  
PCR Services Corporation  
80 South Lake Avenue, Suite 570  
Pasadena, California 91101

Dear Ms. Rous:

This is in response to your letter dated January 29, 2014, requesting consideration of a methodology for evaluating the construction-related greenhouse gas emissions for the proposed development project known as 8150 Sunset Boulevard.

The Air Resources Board (ARB) staff has reviewed the methodology suggested in your letter and agree that it is appropriate for determining whether the project would result in net additional greenhouse gas emissions during the construction phase. This approach would compare the project's construction emissions to the baseline condition, on an annual basis.

ARB has received your official application for AB900 review for the 8150 Sunset Boulevard Mixed Use Project, also dated January 29, 2014, and we will proceed with our technical review of your application using this approach for construction-related greenhouse gas emissions.

Sincerely,

Kurt Karperos, Chief  
Air Quality Planning and Science Division

cc: See next page.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.*

California Environmental Protection Agency

Printed on Recycled Paper

Ms. Heidi Rous  
February 6, 2010  
Page 2

cc: Scott Morgan  
Governor's Office of Planning and Research

Jonathan Taylor, Chief  
Transportation Planning Branch

Joshua Cunningham, Manager  
Transportation Systems Planning Section

**State of California  
AIR RESOURCES BOARD**

**EXECUTIVE ORDER G-14-023**

**Relating to Determination of Any Net Additional Greenhouse Gas Emissions  
Pursuant to Public Resources Code section 21183, subd. (c)**

**For 8150 Sunset Boulevard Mixed Use Project, Los Angeles, CA**

WHEREAS, in September 2011, Governor Brown signed Assembly Bill 900, "Jobs and Economic Improvement through Environmental Leadership Act" (AB 900);

WHEREAS, in accordance with the AB 900, the Governor may certify certain projects for streamlining under the California Environmental Quality Act (CEQA) if certain conditions are met;

WHEREAS, in accordance with California Public Resources Code section 21183, subdivision (c), one condition for the Governor's certification is that the project does not result in any net additional emission of greenhouse gases (GHGs), including GHG emissions from construction and operation of the project, as determined by the Air Resources Board (ARB);

WHEREAS, the Governor's Guidelines for applications for the CEQA streamlining require, for purposes of ARB's determination on GHGs, that an applicant submit electronically to ARB a proposed methodology for quantifying a project's net additional GHGs and documentation that the project does not result in any net additional GHGs;

WHEREAS, PRC Services Corporation (PRC), on behalf of the project applicant, submitted GHG documentation to ARB on the proposed 8150 Sunset Boulevard Mixed Use Project (Project) on January 29, 2014;

WHEREAS, the Application for Environmental Leadership Development Project (Application) for the Project submitted by PRC included the Project's estimated GHG emissions for the full occupancy baseline and estimated GHG emissions for the Project's operational and construction emissions;

WHEREAS, ARB staff conducted a technical evaluation of the GHG emission estimates submitted by PRC in the Application, and confirmed that the Application appropriately estimates the baseline and future emissions using appropriate data and methodology;

WHEREAS, based on ARB staff's evaluation, the Project will result in lower total GHG emissions from project construction and operations in 2015 and all future years than the full occupancy baseline GHG emissions;



WHEREAS, ARB's review, evaluation, and assessment of the Project's GHG emissions is for the limited purpose of the Governor's findings and certification under AB 900; ARB's determination is not in lieu of any findings or determinations required to be made by the lead agency or a responsible agency pursuant to any other requirement under state or federal law, including CEQA; the lead agency remains responsible for full compliance with CEQA for this project;

NOW, THEREFORE, based on ARB staff's evaluation of the Project's full occupancy baseline and future operational emissions (Attachment 1) and review of the application submitted by PRC (Attachment 2), I determine that the 8150 Sunset Boulevard Mixed Use Project will not result in any net additional greenhouse gas emissions pursuant to Public Resources Code section 21183(c).

Executed at Sacramento, California this 27<sup>th</sup> day of March 2014.

  
Richard W. Corey  
Executive Officer

Attachments

1. ARB Staff Evaluation
2. Project Application

**CITY OF LOS ANGELES**  
INTER-DEPARTMENTAL CORRESPONDENCE

October 22, 2014

TO: Michael J. LoGrande, Director of Planning  
Department of City Planning  
Attention: Darlene Navarrete

FROM: Fire Department

SUBJECT: **TRACT MAP NO. 72370 (8150 Sunset Boulevard)**

Subject property has been investigated by members of the Fire Department.

Submit plot plans for Fire Department approval and review prior to recordation of Tract Action.

RECOMMENDATIONS:

No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

Adequate public and private fire hydrants shall be required.

Access for Fire Department apparatus and personnel to and into all structures shall be required.

The Fire Department may require additional vehicular access where buildings exceed 28 feet in height.

Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction.

No framing shall be allowed until the roadway is installed to the satisfaction of the Fire Department.

Where rescue window access is required, provide conditions and improvements necessary to meet accessibility standards as determined by the Los Angeles Fire Department.

Building designs for multi-storied residential buildings shall incorporate at least one access stairwell off the main lobby of the building; But, in no case greater than 150ft horizontal travel distance from the edge of the public street, private street or Fire Lane. This stairwell shall extend unto the roof.

Entrance to the main lobby shall be located off the address side of the building.

Any required Fire Annunciator panel or Fire Control Room shall be located within 50ft visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department.

The applicant is further advised that all subsequent contact regarding these conditions must be with the Hydrant and Access Unit. This would include clarification, verification of condition compliance and plans or building permit applications, etc., and shall be accomplished BY APPOINTMENT ONLY, in order to assure that you receive service with a minimum amount of waiting please call (213) 482-6504. You should advise any consultant representing you of this requirement as well.

RALPH M. Terrazas  
Fire Chief

Mark I. Stormes, Fire Marshal  
Bureau of Fire Prevention and Public Safety

MIS:TW'O:vlj  
TR-72370  
Map No: 148-177

DC

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**From:** Simal Hewawitharana [mailto:simal.hewawitharana@lacity.org]  
**Sent:** Thursday, September 19, 2013 11:08 AM  
**To:** David Crook  
**Subject:** Fwd: ENV 2013025520EIR

[Quoted text hidden]

---

**Veronica Jaimez** <veronica.jaimez@lacity.org>  
To: Simal Hewawitharana <simal.hewawitharana@lacity.org>

Thu, Sep 19, 2013 at 11:40 AM

Hello Simal,  
Okay I'm glad you received it.

Veronica Jaimez  
[Quoted text hidden]

**CITY OF LOS ANGELES**  
INTER-DEPARTMENTAL CORRESPONDENCE

September 19, 2013

**To:** Michael J. LoGrande, Director of Planning  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012  
Attention: Srimal Hewawitharana, Environmental Specialist II

**From:** Fire Department

**Subject: 8150 Sunset Boulevard Mixed-Use Project**  
**ENV 2013-2552-EIR**

**PROJECT LOCATION**

**8150 Sunset Boulevard**  
**Hollywood Community Plan Area**

**PROJECT DESCRIPTION**

The Project Applicant proposes to redevelop the 2.56-acre property located at 8150 Sunset Boulevard with a mixed-use residential and retail project. The property is located within the Hollywood community of the City of Los Angeles (City), and currently contains two commercial structures and other improvements, all of which would be demolished and removed from the site. The proposed project would consist of two buildings over a single podium structure with various elements ranging in height from two stories to 16 stories in height (approximately 42 feet above the ground elevation at the intersection of Sunset and Crescent Heights Boulevards [the "North Building"], increasing to approximately 108 feet for the nine-story portion and approximately 191 feet for the 16-story portion of the building [the "South Building"]; the overall building height is approximately 216 feet as measured from the low point of the site along Havenhurst Drive to the top of the South Building). The North Building, which would be built along Sunset Boulevard, would include two levels with a rooftop terrace containing exclusively commercial uses.

The South Building would contain commercial uses on the first two levels, residential uses on levels three through 15, and a rooftop restaurant/lounge on the top level. The project would include approximately 111,310 square feet of commercial retail and restaurant uses within three lower levels (one subterranean) and one rooftop level, 249 apartment units, including 28 affordable housing units, within the twelve upper levels representing approximately 222,560 gross square feet of residential space. The project would also provide a new central public plaza, new public space at the northeast corner of the site, public rooftop deck/garden areas along Sunset Boulevard, a private pool and pool deck area for residents, as well as other resident-only amenities totaling approximately 6,900 square feet that would include a residential lobby, resident recreation room, fitness center, changing rooms, business center, and library. Parking for all proposed uses would be provided on-site via a seven-level (three subterranean and semi-subterranean levels) parking structure housed within the podium structure that includes 849 total parking spaces (295 for residential uses and 554 for commercial uses).

The total development would include approximately 333,870 square feet of commercial and residential space with a maximum floor-area ratio (FAR) of approximately 3:1. The Project Applicant anticipates commencing construction in 2015 with occupancy occurring in 2017.

The following comments are furnished in response to your request for this Department to review the proposed development:

**A. Fire Flow**

The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and this Department's judgment for needs in the area. In general, the required fire-flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

Fire-flow requirements vary from 2,000 gallons per minute (G.P.M.) in low density residential areas to 12,000 G.P.M. in high-density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (P.S.I.) is to remain in the water system, with the required gallons per minute flowing. The required fire-flow for this project has been set at 9,000 G.P.M. from four to six fire hydrants flowing simultaneously.

Improvements to the water system in this area may be required to provide 9,000 G.P.M. fire-flow. The cost of improving the water system may be charged to the developer. For more detailed information regarding water main improvements, the developer shall contact the Water Services Section of the Department of Water and Power.

All water systems and roadways are to be improved to the satisfaction of the Fire Department prior to the issuance of any building permits.

A valid Division 5 Fire Department permit is required prior to installation for all private fire hydrant systems.

**B. Response Distance, Apparatus, and Personnel**

Based on a required fire-flow of 9,000 G.P.M., the first-due Engine Company should be within 1 mile(s), the first-due Truck Company within 1.5 mile(s).

The Fire Department has existing fire stations at the following locations for initial response into the area of the proposed development:

Fire Station No. 41  
1439 N. Gardner Street  
Los Angeles, CA 90046  
Single Engine Company  
Miles – 0.9 miles

Fire Station No. 27  
1327 N. Cole Avenue  
Los Angeles, CA 90028  
Headquarters Battalion 5  
Task Force Truck and  
Engine Company  
Paramedic Rescue Ambulance  
EMT Rescue Ambulance  
Miles – 2.4

Fire Station No. 97  
8021 Mulholland Drive  
Los Angeles, CA 90046  
Paramedic Engine Company  
Miles – 2.5

Fire Station No. 61  
5821 W. 3<sup>rd</sup> Street  
Los Angeles, CA 90036  
Task Force Truck and  
Engine Company  
Paramedic Rescue Ambulance  
EMT Rescue Ambulance  
Miles – 3.0

Fire Station No. 82  
1800 N. Bronson Avenue  
Los Angeles, CA 90028  
Single Engine Company  
Paramedic Rescue Ambulance  
Miles- 3.2

The above distances were computed to Project Site using Google Maps.

Based on these criteria (response distance from existing fire stations), fire protection would be considered **(inadequate)**.

Adverse Effects: Project implementation will increase the need for fire protection and emergency medical services in this area.

The proposed project would have a cumulative impact on fire protection services.

Project implementation will increase the need for fire protection and emergency medical services in this area

### **C. Firefighting Personnel Access**

During demolition, the Fire Department access will remain clear and unobstructed.

Access for Fire Department apparatus and personnel to and into all structures shall be required.

Access for Fire Department apparatus and personnel to and into all structures shall be required.

The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units

Entrance to the main lobby shall be located off the address side of the building.

Any required Fire Annunciator panel or Fire Control Room shall be located within 50ft visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department.

Building designs for multi-storied residential buildings shall incorporate at least one access stairwell off the main lobby of the building; But, in no case greater than 150ft horizontal travel distance from the edge of the public street, private street or Fire Lane. This stairwell shall extend unto the roof.

### **Policy Exception:**

L.A.M.C. 57.09.03.B Exception:

- When this exception is applied to a fully fire sprinklered residential building equipped with a wet standpipe outlet inside an exit stairway with at least a 2 hour rating the distance from the wet standpipe outlet in the stairway to the entry door of any dwelling unit or guest room shall not exceed 150 feet of horizontal travel AND the distance from the edge of the roadway of an improved street or approved fire lane to the door into the same exit stairway directly from outside the building shall not exceed 150 feet of horizontal travel.



- It is the intent of this policy that in no case will the maximum travel distance exceed 150 feet inside the structure and 150 feet outside the structure. The term "horizontal travel" refers to the actual path of travel to be taken by a person responding to an emergency in the building.
- This policy does not apply to single-family dwellings or to non-residential buildings.

#### **D. Firefighting Apparatus Access**

Access for Fire Department apparatus and personnel to and into all structures shall be required.

No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.

The width of private roadways for general access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky.

Fire lanes, where required and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

Submit plot plans indicating access road and turning area for Fire Department approval.

All access roads, including fire lanes, shall be maintained in an unobstructed manner, removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code.

Where access for a given development requires accommodation of Fire Department apparatus, minimum outside radius of the paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface of the roadway.

Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.

The Fire Department may require additional vehicular access where buildings exceed 28 feet in height.

Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot.

No framing shall be allowed until the roadway is installed to the satisfaction of the Fire Department.

Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction.

All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued.

Plans showing areas to be posted and/or painted, "FIRE LANE NO PARKING" shall be submitted and approved by the Fire Department prior to building permit application sign-off.

Electric Gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety granting a Certificate of Occupancy.

All public street and fire lane cul-de-sacs shall have the curbs painted red and/or be posted "No Parking at Any Time" prior to the issuance of a Certificate of Occupancy or Temporary Certificate of Occupancy for any structures adjacent to the cul-de-sac.

Where rescue window access is required, provide conditions and improvements necessary to meet accessibility standards as determined by the Los Angeles Fire Department.

Site plans shall include all overhead utility lines adjacent to the site.

No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along path of travel.

Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.

At present, there are no immediate plans to increase Fire Department staffing or resources in those areas, which will serve the proposed project.

## **CONCLUSION**

At present, there are no immediate plans to increase Fire Department staffing or resources in those areas, which will serve the proposed project.

Definitive plans and specifications shall be submitted to this Department and requirements for necessary permits satisfied prior to commencement of any portion of this project.

The Los Angeles Fire Department continually evaluates fire station placement and overall Department services for the entire City, as well as specific areas. The development of this proposed project, along with other approved and planned projects in the immediate area, may result in the need for the following:

1. Increased staffing for existing facilities.
2. Additional fire protection facilities.
3. Relocation of present fire protection facilities.

BRIAN L. CUMMINGS  
Fire Marshal

Mark Stormes, Fire Marshal  
Bureau of Fire Prevention and Public Safety

MS:RED:vlj

**LETTER B31**

William Lamborn &lt;william.lamborn@lacity.org&gt;

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**Fwd: RDEIR of 8150 Sunset**

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**Srimal Hewawitharana** <srimal.hewawitharana@lacity.org>  
To: William Lamborn <william.lamborn@lacity.org>

Tue, Nov 10, 2015 at 10:16 AM

----- Forwarded message -----

From: **Jamie Hall** <jhall@laurelcanyon.org>

Date: Mon, Nov 9, 2015 at 5:22 PM

Subject: RDEIR of 8150 Sunset

To: Srimal Hewawitharana &lt;srimal.hewawitharana@lacity.org&gt;

Cc: [planning.envreview@lacity.org](mailto:planning.envreview@lacity.org), Christopher Rice <c.rice78@yahoo.com>, Ric Abramson <ric@workplays.com>, Marla Miller <marla1008@yahoo.com>, Jerry Ptashkin <ptashkin@aol.com>, Ebon Alabastur <alabastur@aol.com>, Lynn Russell <lenabydesign@mac.com>, Rory Barish <n2swimng@aol.com>, Cyd Zeigler <cydzeiglerjr@gmail.com>, Scott Lunceford <slunceford@weho.org>, Anastasia Mann <anastasia@comiche.com>, Adara Salim <adarasalim@gmail.com>, Marian Dodge <president@hillsidefederation.org>, Jamie Hall <jamie@jamiethall.com>, Karen Demille <karendemille@gmail.com>, Grafton Tanquary <gpt1287@sbcglobal.net>, [david.ryu@lacity.org](mailto:david.ryu@lacity.org), Renee Weitzer <renee.weitzer@lacity.org>, Julia Duncan <julia.duncan@lacity.org>, Travis Longcore <tlongcore@babnc.org>, Orrin Feldman <ofeldman@pacbell.net>

Please see attached.

Regards,

Jamie T. Hall

**Laurel Canyon Association***President*

(323) 380-0845 office

(512) 619-4645 cell

[jhall@laurelcanyon.org](mailto:jhall@laurelcanyon.org) email[www.laurelcanyon.org](http://www.laurelcanyon.org) web—  
**Srimal P. Hewawitharana****Environmental Specialist II**

Los Angeles City Planning Department

EIR Analysis Section, Mail Stop 395

200 North Spring Street, Suite 750

Los Angeles, CA 90012

(213) 978-1359



**8150 Sunset Blvd EIR Comment Letter.pdf**

660K



*A Community Organization Dedicated to Improving and Preserving  
the Quality of Life in Laurel Canyon*

November 9, 2015

**VIA E-MAIL**

Srimal Hewawitharana  
Environmental Analysis Section  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, California 90012  
srimal.hewawitharana@lacity.org

**Re: Comments in Response to ENV-2013-2552-EIR (Sunset Boulevard  
Mixed-Use Project located at 8150 Sunset Boulevard)**

Dear Ms. Srimal:

I am in receipt of the Notice of Extension (“NOE”) dated October 21, 2015 for the Sunset Boulevard Mixed-Use Project located at 8150 Sunset Boulevard (“Project”). As the President of the Laurel Canyon Association (“LCA”) I am pleased to provide comments in response to the draft Environmental Impact Report (“DEIR”) prepared for the Project.

**About Laurel Canyon Association**

Initially, and by way of background, I would like to provide some background. LCA is a neighborhood association serving the area of the Hollywood Hills known as “Laurel Canyon,” one the most beautiful and environmentally important areas of Los Angeles. The hills in Laurel Canyon provide a scenic backdrop for the rest of Los Angeles. Further Laurel Canyon’s forested valleys and chaparral-draped hillsides offer habitat for native wildlife. Laurel Canyon also is home to a watershed and greenbelt for the vastly developed plains of Los Angeles and the San Fernando Valley.

LCA was founded for the express purpose of preserving and improving the quality of life in Laurel Canyon. The goal of our community group is to promote the welfare of the residents of Laurel Canyon and to maintain the quality of life in the Hollywood Hills, by preserving its residential character, its quiet, privacy, natural beauty and safety. Moreover, LCA endeavors to encourage cooperation among all residents and

**Tel: 310-982-1760  
Email: [jhall@laurelcanyon.org](mailto:jhall@laurelcanyon.org)**

to educate appropriate governmental bodies concerning changes in existing or proposed laws affecting Laurel Canyon or in anything that affects the local community.

LCA's jurisdiction includes Laurel Canyon Boulevard, its feeder streets and the Kirkwood, Stanley Hills, Lookout Mountain and Wonderland bowl areas. The neighborhood is bounded on the north by Mulholland Drive and at the south by Hollywood Boulevard. The main streets are Laurel Canyon Boulevard, Mulholland Drive, Wonderland Avenue, Lookout Mountain Avenue, Kirkwood, and Stanley Hills. LCA is a residential stakeholder with membership in the Los Angeles Neighborhood Council system, specifically, the Bel-Air Beverly Crest Neighborhood Council ("BABCNC").

#### Incorporation of Comments Provided by Save Sunset Boulevard

LCA has read the letter of protest submitted by Save Sunset Boulevard ("SSB"), an organization founded to promote responsible development along Sunset Blvd. and to raise awareness of the impacts of large developments on nearby communities. LCA supports the comments and concerns raised by SSB.

#### Environmental Issues Implicated by Project

For decades, residents of LCA have patronized stores located at 8150 Sunset Boulevard. Moreover, each day thousands of residents pass by the property on their way to work, visit friends and shop and school. The flow of traffic at the intersection of Sunset Boulevard and Crescent Heights/Laurel Canyon Boulevard is of paramount concern to LCA.

LCA offers the following comments:

*Traffic/Transportation:* The traffic study prepared needs to be redrawn as it is not accurate now that the design has changed significantly. The intersection of Crescent Heights and Sunset is severely congested and the impacts associated with the Project are unknown without an adequate traffic study,

*Visual Impacts:* The Project is even taller than the previous design. The City has failed to adequately analyze the significant visual impacts associated with the Project. The project should be limited to approximately 100 feet. Otherwise it will block the skyline, an irreplaceable natural resource.

*Setbacks:* The proposed 4-foot setback along crescent heights will make the building loom over the area.

*Noise:* The applicant should measure the ambient noise levels in the Hollywood Hills to assess the impact that the Project will have on residents who reside in the hills. Specifically, ambient noise levels should be measures on Grand View Drive, both during the day and night.

Please don't hesitate to contact me if you have any questions or comments. I may be reached at 310-982-1760 or [jhall@laurelcanyon.org](mailto:jhall@laurelcanyon.org).

Regards,

A handwritten signature in black ink, appearing to read 'Jamie T. Hall', with a stylized, cursive script.

Jamie T. Hall  
Laurel Canyon Association  
President



**LETTER B32**

Planning Environmental Review &lt;planning.envreview@lacity.org&gt;

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**8150 Sunset Blvd. - Case No. ENV-2013-2552-EIR**

2 messages

**Casey Maddren** <cmaddren@gmail.com>

Mon, Nov 9, 2015 at 4:09 PM

To: planning.envreview@lacity.org

Srimal Hewawitharana

Environmental Analysis Section

Department of City Planning

200 N. Spring Street, Room 750

Los Angeles, California 90012

Re: 8150 Sunset Blvd. - Case No. ENV-2013-2552-EIR

Dear Ms. Hewawitharana,

I am writing to comment on the Recirculated DEIR for the 8150 Sunset Project, Case No. ENV-2013-2552-EIR. The revised design does nothing to address my serious concerns about reliable water supply and fire safety.

The water main that serves this project runs beneath Sunset Blvd. and is roughly one hundred years old. It has ruptured a number of times, and there was a major break in September 2014 that flooded the intersection of Sunset and La Cienega. According to Steve Cole of the DWP, the agency plans to replace the stretch of pipe running roughly between Fairfax and Beverly Hills. At this time, however, the DWP has not decided on a plan for doing this. There is no start date or completion date for this job, meaning that this fragile water main could be relied on to serve Sunset Blvd. for several years to come, and there's no doubt that it will only decay further during this time.

This is a serious concern, as this main will be providing the water which will serve 8150 Sunset in case of fire. It is already doubtful that the main could provide the normally required 9,000 gallon per minute flow that a project this size would require. I understand that LAFD has some latitude for relaxing this requirement, but even so, I have to question whether this main can deliver the water necessary to fight a fire in a mixed-use high-rise of this kind.

Compounding the situation is that the Sunset water main lies very close to the Hollywood Fault. A quake of any size could easily rupture this already fragile main. If a fire were to break out at 8150 Sunset as a result of the quake, which is not unlikely, the hydrants serving the project would be useless.

I know the DWP and the LAFD have reviewed the DEIR, but they have not specifically addressed the fragility of this aging water main and its reliability in case of a major fire and/or earthquake. This is a major safety issue. Will the developer produce analyses from the DWP and the LAFD addressing these concerns, and stating that the existing infrastructure will serve 8150 Sunset in the event of the scenario I've described?

Thank you for your time.

Casey Maddren

2141 Cahuenga Blvd., Apt. 17

Los Angeles, CA 90068

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**Planning Environmental Review** <planning.envreview@lacity.org>  
To: cmaddren@gmail.com

Mon, Nov 9, 2015 at 4:10 PM

Thank you for submitting your comments. They have been received and will be included in the administrative record for the Environmental Impact Report (EIR).

*This reply is automatically generated and this mailbox is only actively monitored during an EIR's public comment period. If you have specific questions or would like an immediate response, please contact the project planner identified on the notice directly.*

**LETTER B33**

Planning Environmental Review &lt;planning.envreview@lacity.org&gt;

**City Case No. ENV-2013-2552-EIR**

2 messages

**Save 750 Edinburgh** <save750edinburgh@gmail.com>

Mon, Nov 9, 2015 at 3:11 PM

To: planning.envreview@lacity.org, david.ryu@lacity.org, mayor.garcetti@lacity.org

Dear Srimal Hewawitharana, Mayor Garcetti and Councilman Ryu,

I am writing in opposition to EIR submitted by the developer for the proposed project at 8150 Sunset Blvd (City Case No. ENV-2013-2552-EIR). This is a massive, out of scale development that will adversely impact the region and its residents. I ask that you deny the developers approval of the Environmental Impact Report, which I feel both does not adequately address the enormous negative stresses the project will produce and the legal liability (lawsuits) the city would expose itself to for approving such a poorly written and blatantly pro-developer EIR report. While the new design is better, many basic issues of need and function have been ignored in favor of splashy architecture. This EIR does not conform.

Some of my specific problems with this proposal include:

**HEIGHT:** at 234 feet (22 stories), the highest proposed tower is three times the height of nearby structures like the DGA building (79 feet) and would be the largest building on Sunset Blvd, dwarfing the surrounding neighborhood and becoming an enormous eyesore. **THE PROJECT IS TOO TALL.** 100 Ft should be the limit.

**TRAFFIC:** The Traffic study needs to be redrawn, it is not accurate now that the design project exits have completely changed and uses highly suspect numbers to make the project seem less impactful than it is.

**PEDESTRIAN SAFETY:** Say No to eliminating the Traffic Island!

Setbacks on the new design are almost non existent and part of the reason for eliminating the traffic island is to give the developers their legally required setback. The traffic island should stay owned by the city and not be donated to this project as a gift. It is vitally important for pedestrian and driver safety

**ZONING:** The developer is looking for variances for its increased density by claiming a "Major Transit Stop" at Fairfax and Sunset which is more than 1,500 feet from the development, a violation of the

city's general plan! **Say NO to an off-menu Incentive to permit a 3:1 floor area ratio for a Housing Development Project located within approximately 1,560 feet of a Transit Stop, in lieu of the 1,500 foot distance specified in the on-menu Incentive allowing a 3:1 floor area ratio (LAMC Section 12.22-A,25(f)(4)(ii);)**

AGING INFRASTRUCTURE: We have seen constant failures of the water and sewage pipes in the area. Our water and sewage infrastructure needs to be improved before we consider adding density.

Specifically, the basic assumption is that by providing the Community with Benefits such as Affordable Housing, Parking, Bike Racks and Parks the Developer gets to ignore the underlying zoning on the site and build something much bigger and taller than otherwise possible. What is the Community benefit? Where is the Public offsite Park space other than interior plaza space on site? We know the number of affordable units, but how much will they rent for and who will they be rented to? Without specific and transparent answers to this question, the DEIR is fatally flawed and cannot / should not be approved.

The documentation in the DEIR is incomplete because it has not adequately evaluated the Community Benefits of the project that will provide an offset to the resulting zoning upgrades and potential environmental impacts associated with the proposed project. **Therefore, I find the DEIR deficient and unable to substantiate the proposed project.**

Sincerely,

Friends of Edinburgh Bungalow Court HCM

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**Planning Environmental Review** <planning.envreview@lacity.org>  
To: save750edinburgh@gmail.com

Mon, Nov 9, 2015 at 3:11 PM

Thank you for submitting your comments. They have been received and will be included in the administrative record for the Environmental Impact Report (EIR).

*This reply is automatically generated and this mailbox is only actively monitored during an EIR's public comment period. If you have specific questions or would like an immediate response, please contact the project planner identified on the notice directly.*

**LETTER B34**

Planning Environmental Review &lt;planning.envreview@lacity.org&gt;

**City Case No. ENV-2013-2552-EIR**

1 message

**GREGORY WIDEN** <gregorywiden@mac.com>

Mon, Nov 9, 2015 at 4:22 PM

To: planning.envreview@lacity.org

Cc: david.ryu@lacity.org, mayor.garcetti@lacity.org, renee.weitzer@lacity.org, cd4.issues@lacity.org, sarah.dusseault@lacity.org, julia.duncan@lacity.org, Michael.loGrande@lacity.org, Info@lamayor.org, Lhorvath@weho.org, Jheilman@weho.org, Lmeister@weho.org, Jdamico@weho.org, Jduran@weho.org, Slunceford@weho.org

Dear Srimal Hewawitharana, David Ryu, and Mayor Garcetti,

Over 440 people that have signed this petition below against the size, height and mass of the proposed development at 8150 Sunset Blvd. Attached for your review are the list of names against this project and their comments. Thank you for your consideration, time and effort on these comments. It is greatly appreciated by the members of the community. You may also view this petition at this web address:

<https://www.change.org/p/mayor-eric-garcetti-david-ryu-lindsey-horvath-srimal-hewawitharana-save-sunset-blvd-limit-the-development-of-8150-sunset-blvd-to-100-feet>

**PETITION TEXT:**

The proposed 8150 Sunset Blvd Skyscraper Development on the corner of Crescent Heights, at 234 feet tall, is going to be the tallest building EVER on the Sunset Strip.

For comparison the Hollywood Roosevelt Hotel is just 161 feet, the Capitol Records building is just 150 feet. This massive tower being proposed by out of town building interests would be even higher than 9000 Sunset or Soho House! Its overdevelopment of the space will snarl traffic, inhibit response emergency response times, overburden water, sewage and transportation infrastructure and ruin quality of life for the entire area. It's would dwarf anything around it and be a massive eyesore. We can not sacrifice basic needs and function for splashy

architecture.

1. Lets limit this building to 100 feet and keep Sunset Blvd a place we want to work, visit and live in.
2. Say No to removing the traffic island at Sunset Blvd & Crescent Heights. This is city land and should not be gifted to the developers so they don't have to put in a proper building setback. We will pay the price in traffic jams.
3. Say NO to an off-menu Incentive to permit a 3:1 floor area ratio for a Housing Development Project located within approximately 1,560 feet of a Transit Stop, in lieu of the 1,500 foot distance specified in the on-menu Incentive allowing a 3:1 floor area ratio (LAMC Section 12.22-A,25(f)(4)(ii);

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**2 attachments**

 **petition signatures 11-9.pdf**  
580K

 **petition comments 11-9.pdf**  
441K

Recipient: Mayor Eric Garcetti, David Ryu, Lindsey Horvath, and Srimal Hewawitharana

Letter: Greetings,

Save Sunset Blvd! Limit the development of 8150 Sunset Blvd to 100 feet! City  
Case No. ENV-2013-2552-EIR

# Comments

Name	Location	Date	Comment
gregory widen	West Hollywood, CA	2015-11-02	This is a terrible development completely out of scope with the rest of the neighborhood and should be stopped.
Allegra Riggio	New York, NY	2015-11-02	I am DIRECTLY AFFECTED by this construction. It's ATROCIOUS how high they want to build, and not only OBSTRUCT our views from the hill, but also ALL OF LOS ANGELES' view of the landmarked Chateau Marmont.
Colin Vaines	Los Angeles, CA	2015-11-02	This is just plain WRONG. It is absolutely imperative that some limits are put on the height of buildings in LA: the city needs to respect it's inhabitants who do not want a towering eyesore. Please do not cave in to developers with no sense of anything outside of trying to turn a massive profit. There is more to a city than that.
ALEXANDRA ROSE	LOS ANGELES, CA	2015-11-02	The proposed building is far too tall - let's keep it the height of the Capitol Records Building. The traffic problems that are being created by such a large project have not been adequately addressed; and the set back is too narrow - more set back is needed. The building is beautiful; but the towers must be reduced - the scale is overwhelming and "out-of-scale" with the neighborhood.
Phil Hammond	Los Angeles, CA	2015-11-02	I live on Havenhurst and will be impacted by this project.
Mary Haskell	Los Angeles, CA	2015-11-02	I'm signing because the project scale is way too tall and masive... The height of the south west tower is too tall!!
Kathy Small	Los Angeles, CA	2015-11-02	I am sick at heart at what the City of L.A. is allowing these developers to do to Sunset Blvd. and our historic neighborhood.
Arost Arost	Los Angeles, CA	2015-11-02	SCALE DOWN 8150 SUNSET
Judy Stabile	Los Angeles, CA	2015-11-03	This project is way out of scale for this neighborhood which suffers enough without this monster building casting a huge negative shadow on an entire community!!!
Rick Farber	West Hollywood, CA	2015-11-03	We don't need it, the bldg is horribly ugly and completely out of scale to the area. Traffic will be unbearable
Megan Mullally	Los Angeles, CA	2015-11-03	this development will ruin central Los Angeles for all of it's residents. strongly oppose!
Karen Loewenstern	Avon, CO	2015-11-03	I live and enjoy the Sunset Blvd. area and if they limited our La Cienega buildings height to maintain the integrity of the Blvd., they should follow suit at Crescent Heights.
Carolyn Driscoll	Saratoga, CA	2015-11-03	Trying to drive to that neighborhood is difficult enough as it is. A building this large will cripple the neighborhood with the additional traffic.
Derek Richmond	West Hollywood, CA	2015-11-03	I'm signing because this proposal is idiotic.
Gerry Mahaney	Naples, FL	2015-11-03	I want to support my family that lives on Havenhurst.
Darren McMullen	Los Angeles, CA	2015-11-03	This building will be an eye sore. It's far too tall.
Francis LaRoche	West Hollywood, CA	2015-11-03	The project is entirely too massive and impacts not only Sunset but will overwhelm the Havenhurst Dr with traffic and other city services.
joseph eastwood	Los Angeles, CA	2015-11-03	I believe this development is way too tall and will put a burden on our already busy street.
Marianne Liggett	Venice, CA	2015-11-03	This is blatant over-development. Just too much already!
David Hammond	West Hollywood, CA	2015-11-03	David Hammond



Name	Location	Date	Comment
Kelly Spirer	Los angeles, CA	2015-11-03	It will impact our lives on a daily basis not only through construction but also when inhabited. Contrary to what the developers would say, this will in no way alleviate congestion but rather increase it in an already over impacted community.
Tony Tucci	Beverly Hills, CA	2015-11-03	california's 3:1 density bonus that allows obscene growth for affordable housing is a poorly applied law in LA City
Elizabeth Ziegler	Los Angeles, CA	2015-11-03	I live on Laurel Canyon Blvd, and the area surrounding is already congested.
david gold	West Hollywood, CA	2015-11-03	Gives developers plenty of FAR without totally overwhelming the neighborhood with towers.
Diane Lander-Simon	Los Angeles, CA	2015-11-03	I live nearby and I am sick of traffic and fire and earthquake risk. Plus not enough police. STOP THIS"
Elyse Eisenberg	West Hollywood, CA	2015-11-03	This project is higher and denser than anything on Sunset from the ocean to downtown. It's essentially in a residential, low and moderate height zone for miles around. The intersection already frequently takes 5-6 traffic light cycles to get through along Crescent Heights, and can be backed up for a half mile. To say the EIR is flawed is an understatement. It is time for the City of LA to support the residents - NOT developers - as stakeholders invested in the long-term viability of the community.
SUELLEN Wagner	Studio City, CA	2015-11-03	Too much development is death to our neighborhoods. Recall Garcetti!
Cathy Wayne	Los Angeles, CA	2015-11-03	This development will bring more traffic to an already congested location and the inability of residents to have access to their homes especially in an emergency. This development needs to enhance the neighborhood not bring more problems.
Lynda Barends	West Hollywood, CA	2015-11-03	I believe it is best for the community.
Alison Simard	Los Angeles, CA	2015-11-03	I live in this neighborhood. This preload project is at the foot of Laurel Canyon a neighborhood constantly in danger of wildfire. I have watched this protect very closely. The long term affect on traffic of a destination behemoth project will cause certain negative impact on public safety on a corner with a long history of pedestrian tragedies and the traffic snarls will impede Laurel Canyon ingress and egress for emergency vehicles. The proposed building is out of character with the neighborhood because it is way too tall even if aesthetically Frank Geary had made substantial improvement it is still not enough.
M.S. Epstein	Los Angeles, CA	2015-11-03	I live near this site and experience the glut of traffic and its frustrating and frequently dangerous consequences. This project is literally a massive overreach,slamming an already surreally and dangerously congested area. This will deal a lethal blow to nearby businesses.It will impact badly upon the extensive and historic residential neighborhoods that sit just beyond Sunset Blvd on both sides. It will exacerbate the legendary traffic problems through Laurel Canyon for all citizens who venture there, but particularly for emergency response vehicles. There is no rational argument to support this. Think. Again. Please.
Amanda Goodwin	West Hollywood, CA	2015-11-03	Stop destroying Sunset and adjacent neighborhoods in order to line the pockets of the few wealthy. This project does nothing to better the city or the residents.
Catherine Sullivan	Los Angeles, CA	2015-11-03	Because the almighty \$\$\$ can not be the only voice we see, hear and know when we make decisions in our small but mighty community of Weho! 100 ft should surely suffice in the needs of the development and community!
Seth Meier	West Hollywood, CA	2015-11-03	It is going to strangle an already congested intersection and there is no height comparable in the area. It will block the iconic Chateau Marmount and kill the area.

Name	Location	Date	Comment
Melissa Susac	Los Angeles, CA	2015-11-03	This project sounds completely out of scale with the surrounding buildings and charming hillside area. It will add traffic in an already congested area.
Jaime Schoenbrun	santee, CA	2015-11-03	I used to work here and it is hard to get around with the current traffic adding more will be impossible.
Talisa Reeve	Venice, CA	2015-11-03	Skylines define a cities imagery and beauty. Sunset Blvd.'s skyline shouldn't be muddled with.
John Bollard	Los Angeles, CA	2015-11-03	Redevelopment is needed, but height must be limited!!!
Peter Spirer	Los Angeles, CA	2015-11-03	I want development to be inline with surrounding development. This building is an anomaly that will blemish our landscape. Bigger isn't always better.
Francisco Arbolay	Caguas	2015-11-03	This is an important part of the pop culture and music history. Don't ruin it please.
Craig Clark	Los Angeles, CA	2015-11-03	The concept is to tall and really ugly. Completely overwhelms the area's current architecture, with a hideous futuristic style, totally out of place. It will increase traffic congestion, on an already difficult intersection.
Andrew Macpherson	Los Angeles, CA	2015-11-03	I do not believe that this 234 ft tall monster should be allowed to dominate the Chateau Marmont and the other architectural treasures of this historic part of old Hollywood.
joanna cassidy	woodland hills, CA	2015-11-03	Greed and more greed.....it's got to stop
James teel	Los Angeles, CA	2015-11-03	Urban-core development in a residential area is not appropriate
rivkind michael	Los Angeles, CA	2015-11-03	scale of project far too large in relation to surroundings also sunset traffic at this intersection already bad without any future developements
Billie Mahaney	Annandale, NJ	2015-11-03	My uncles, Phil and Patrick love their home and the view and a skyscraper would take away from that!!
Doria Biddle	West Hollywood, CA	2015-11-03	Until this city/county deals with our traffic issues, we can't keep adding to the overcrowding.
Michael Katcher	San Bruno, CA	2015-11-04	I'm signing because I want to save my neighborhood.
Leslie Sank	Beverly Hills, CA	2015-11-04	I am signing this because we can't add that many places with the drought the way it is.... We can not sustain too much more!
Martin Schneider	Los Angeles, CA	2015-11-04	This proposed 8150 project is out of architectural sync, enormous in scale, and will bring a heavier density of traffic to the existing norm to this Hollywood foothill community.
lucy webb	Los Angeles, CA	2015-11-04	We don't need sunset to change!!!! Traffic!!'
Eric Holck	Los Angeles, CA	2015-11-04	It is absurd to think that putting such a massive complex just up the street will not have a hugely detrimental effect on the traffic, safety and general quality of life for those of us who live in this area. Enough with the over-development already!
Nikki Wood	Los Angeles, CA	2015-11-04	I live one block east of this proposed development and have for 10 years this far. The sewage and water pipes barely survived the revamp of the 8000 Sunset Blvd building I can't imagine what
Robin Diaz	Los Angeles, CA	2015-11-04	I'm opposed to seeing the sunset strip and my neighborhood being turned into to LAS-VEGAS!!!! I'm for redevelopment but this proposed project is out of scale.

Name	Location	Date	Comment
Aaron Heck	Los Angeles, CA	2015-11-04	I am the third owner of my home that was built in 1923. I have lived here since 1998 and my land ownership rights will be violated if this structure is built. I promise to sew the developers and the city if this project breaks ground!
Christopher Rice	West Hollywood, CA	2015-11-04	I'm an area resident who feels the current plan is too tall.
Dimitri Perparos	Los Angeles, CA	2015-11-04	West Hollywood is being completely overbuilt and overrun by developers.
Michael Leeson	Los Angeles, CA	2015-11-04	The project must be limited or traffic will be more of a nightmare than it already is!
Harker Jones	Los Angeles, CA	2015-11-04	I'm signing because the proposed building is a monstrosity. Develop the space, just not like this.
Marne Carmean	West Hollywood, CA	2015-11-04	I live on Havenhurst Drive below Sunset Blvd. and this project is greatly outsized, like mcmansions, only it is residential and commercial. The distress of the construction then the dismay of living it with is too much to expect of residents.
David Alexandre	richardson, TX	2015-11-04	I love the idea of keeping this monolithic terror out of that area. Please don't let this energy sucker be built.
Lee Clay	Los Angeles, CA	2015-11-04	IT'S TOO TALL!!!!
Stephanie Savage	Los Angeles, CA	2015-11-04	The project is out of scale with the neighborhood and the traffic load will add to already overburdened infrastructure. And yes it is to tall!
michael shores	West Hollywood, CA	2015-11-04	This project does not fit the scale of this neighborhood. It is too tall and will compromise neighborhood safety and privacy.
Robert Lea	West Hollywood, CA	2015-11-04	<p>The disruption caused by demo and construction through traffic, noise, and oversized work vehicles on tiny streets will make my neighborhood an unlivable hell. The artifical upward pressure this would have on rents will inevitably cause prices to soar in an already inflated rent market (not to mention incentivizing eliminating apartments in favor of condos).</p> <p>I am totally opposed to this development project.</p>
Vanessa Beletic	Los Angeles, CA	2015-11-04	We must not let development take priority over the quality of life of West Hollywood's community. Please limit building height to 100ft.
Deborah Fairchild	Los Angeles, CA	2015-11-04	We don't need a high-density high-rise at a such a busy intersection in our neighborhood, where Laurel Canyon and Sunset Blvd. meet. Safety first! Limit the development.
Francine Brandt	Sherman Oaks, CA	2015-11-04	This is just too damn big. Out of scale
Vicky Miller	Los Angeles, CA	2015-11-04	Sunset is already a mess. Blocks the view for the rest of us as well. WE dont need or want a tall skyscaper on the corner of Crescent Height and Sunset!! STOP THIS NOW
Yoav Getzler	Valley Village, CA	2015-11-04	Because it's just too tall.
Jeff Deperon	West Hollywood, CA	2015-11-04	We don't want another giant generic modern high rise on the corner of such a busy intersection. Causing all kind of traffic, noise and parking problem in our neighborhood. Too much is too much. Time to end the indiscriminating rape of our neighborhood.
O T	Los Angeles, CA	2015-11-04	This building is WAY too tall. Our traffic and neighborhood will suffer greatly. Please limit the size of this building, there are 9 more hotels being built on Sunset right now, the impact on traffic and safety is excessive for our neighborhood. Please help.
Joy Barr	Los Angeles, CA	2015-11-05	This building will deface the community skyline, will create even worse local traffic at <del>a major</del> intersection, & is far too tall to safely exist on the Hollywood fault line.

Name	Location	Date	Comment
Jane Lockhart	West Hollywood, CA	2015-11-05	My quality of life living opposite and at the corner of this oversized building complex, will be negatively impacted.
Elaine Gilboa	Los Angeles, CA	2015-11-05	I am fed up with all the building going on in our neighborhood and the huge projects.
Christina Odegard	Los Angeles, CA	2015-11-05	Density concern
Bernard Judge	Los Angeles, CA	2015-11-05	oppose the skyscraper on the corner of Crescent Heights a Sunset Blvd.
Eva M. Ballo	Los Angeles, CA	2015-11-05	The proposed height of the 8150 Sunset Blvd project is totally out of proportion to the neighborhood's architectural character and style, and would also drastically increase the already existing traffic congestion in the area. Eliminating the access spur enabling eastward Sunset traffic to bypass the traffic light for acces to Crescent Heights going southward would additionally hamper traffic - an intolerable outcome. Furthermire, the projected parking space in the revised plan is still insufficient to accommodate residents, their guests, and the commercial tenants and their patrons.
Anne Curry	Los Angeles, CA	2015-11-05	Overdevelopment is and certainly in this case would be a disaster.
Courtney Small	Los Angeles, CA	2015-11-05	I am disgusted by the overdevelopment of Los Angeles and the historic Sunset Strip.
Eric Quinn	West Hollywood, CA	2015-11-05	This impacts my neighbors and my neighborhood. I'm pro-responsible development.
David Romero	West Hollywood, CA	2015-11-05	Our homes are getting overcrowded.
Susan Lavitt	Los Angeles, CA	2015-11-05	The density in our area has become untenable. Our infrastructure can't handle this much traffic, the congestion it will cause is dangerous and in the event of a fire or earthquake lives will surely be at risk. Please build responsibly our lives and well being depend on it and we depend on you to do the right thing. After all, doing the right thing is always the right thing to do.
Kira Sardy	Los Angeles, CA	2015-11-05	I am opposed
Erica Spano	Excelsior, MN	2015-11-05	I have seen neighborhoods get horribly dangerous when over developed. Case in point the development on Santa Monica Blvd and LaBrea or the Home Depot and half built Target on Sunset in East Hollywood!!!
Maryanne HOLmes	San Juan Capistrano, CA	2015-11-05	My brother lives in this neighborhood.
Kelly Forbes	Los Angeles, CA	2015-11-05	There is already too much congestion~ this would be insanity!!!
Brian Linse	Los Angeles, CA	2015-11-05	Proposed height of the project exceeds all reasonable measures. Traffic at that intersection is already unmanagable.
Sandra Hitt	Los Angeles, CA	2015-11-05	I live in the neighborhood and this affects me.
Joe Kay	Los Angeles, CA	2015-11-05	Way too much traffic!!!
Kristen Stavola	Los Angeles, CT	2015-11-05	This development needs to go back to the drawing board! The Sunset Strip does NOT need to be building the tallest building ever, esp not in an area where the infrastructure simply cannot support it, not the water, not the power and certainly not the traffic.
Kim Kaufman	Los Angeles, CA	2015-11-05	Please stop over-development in Los Angeles. This building will make living in Laurel Canyon even more dangerous in cases of fire and other emergencies because of the additional traffic.
Elias Cameron	Worcester, United Kingdom	2015-11-05	<del>Is there</del> a shortage of land in the US or something?

Name	Location	Date	Comment
Michael Hoover	Los Angeles, CA	2015-11-05	It is a palpable disaster, and one that can be stopped. Granted, something nice should be there, but... the increased stress on our infrastructure (water, power,traffic) make this iteration of the plan unworkable. Stop it while it can be stopped. How did this get as far as it has, anyway?
Lelani Eickhoff	Simi Valley, CA	2015-11-06	We do NOT need more traffic on Sunset Blvd!
linda marder	l.a., CA	2015-11-06	Building on Sunset in West Hollywood is OUT OF CONTROL!!!
Chloe Palmer	Los Angeles, CA	2015-11-06	I work at Wonderland school and the traffic is already so hard to manage. I have to leave my house at 6:20 to get to school so that I can find parking by 8am. The area cant handle this please think about it.
Deborah Rankin	Los Angeles, CA	2015-11-06	I am against the size of this building, towering over everything in the neighborhood. How hideous it will be, not to mention all the traffic issues, etc... that will come with it.
Alex Nicholas	Beverly Hills, CA	2015-11-06	I care about the city. This project is far too big for the location. Traffic will be greatly impacted on Sunset, a street already overburdened. Also, a project the size of the one proposed will absolutely destroy the character of the neighborhood directly below it. If they take away the island on the corner, will they also take away the ability to turn right off of Sunset onto Crescent Heights? How would that not completely devastate traffic patterns?
Wendel Meldrum	los angeles, CA	2015-11-06	This structure does not fit with the neighbourhood and brings too much density and traffic.
Ronald Maxson	Los Angeles, CA	2015-11-06	There are so many reasons why this is not a good idea, as outlined in the petition:
monica fishman	Carpinteria, CA	2015-11-06	I've been a long time resident of the LA area. I've moved to Carpinteria, but my kids & many friends live in LA still. I'm there all the time & can see the enormous increase in traffic since I've moved from the area. I'm signing this in support of all the people living & working in LA who fight the beastly traffic each day. We surely don't need congestion to deal with.
Cinnia finfer	Los Angeles, CA	2015-11-06	Will the current development at 8150 Sunset is sorely in need of an update, the proposed development is wildly out proportion with the immediate area and will deliver a tremendous burden and already clogged traffic corridor. The new structure needs address an existing problem not simply compound it!
Alan Hadaya	West Hollywood, CA	2015-11-06	I don't want that area changed, it's great as is.
Peter Spirer	Los Angeles, CA	2015-11-06	I am all for development that is reasonable. However the proposed plan if implemented will be out of balance with the surrounding community. It will destroy the current landscape and create traffic chaos to an overly congested part of the city. Skyscrapers are out of place in West Hollywood.
Peter Spirer	Los Angeles, CA	2015-11-06	I am all for development that is reasonable. However the proposed plan if implemented, will be out of balance with the surrounding community. It will destroy the current landscape and create traffic chaos to an overly congested part of the city. Skyscrapers are out of place in West Hollywood.
David Neely	Los Angeles, CA	2015-11-06	If we don't stop these rabid developers now, they will think they can get around all the current laws and restrictions that are in place. They are already in trouble throughout the city.

Name	Location	Date	Comment
Burt Goralnick	Los Angeles, CA	2015-11-06	<p>A redevelopment of this magnitude at this location is simply ridiculous. The New York backers of this proposed development could care less about the impact.</p> <p>What's going to happen when Sam Nazarian, (SLS Hotels) SBE Group decides to redevelop their nightclub site into a large hotel Directly across Sunset, at Laurel Canyon!</p>
Burt Goralnick	Los Angeles, CA	2015-11-06	David Ryu, We voted you into office, now do your job. Protect our neighborhood from dangerously over development.
Chris Brewster	Los Angeles, CA	2015-11-06	The construction on Sunset and La Cienaga is out of control. 100 stories is too many.
ROBERT MEADOWS	West Hollywood, CA	2015-11-06	The proposed tower is too tall, and there are not enough parking spaces for such a large number of apartments/condos.
Viktoria Cornelius	Los Angeles, CA	2015-11-07	I'm signing this petition because I care about the safety and integrity of my neighborhood.
Lynda Barens	West Hollywood, CA	2015-11-07	The impact it will have on the residents is overwhelming. Think about it. Really. Why do we need New York in West Hollywood. We are so blessed to live in Weho enough is enough. Thank you to all of you who are fighting and taking your valuable time. Those who believe in saving The true Sunset Strip as we know or knew it. Please sign this petition on behalf of the locals who truly care.
G Morris	Venice, CA	2015-11-07	As a Los Angeles resident, I am sick and tired of Garcetti's Administration ignoring the laws and granting entitlements to developers which are going to make our city a more dangerous, crowded and less livable city. It is time the city respected its constituents wishes and upheld their own laws. Same goes for my neighborhood Venice and every other part of LA which is under the same threat! Garcetti is all about developers dollars. He does not care about the people in our city. It's a crying shame.
Burt Goralnick	Los Angeles, CA	2015-11-07	<p>I have lived on N. Crescent Heights Blvd since 1994. I have seen the Sunset Blvd traffic get worse each year.</p> <p>A redevelopment of this magnitude at this location is simply ridiculous. The New York backers of this proposed development could care less about the impact. The ELECTED city officials have a responsibility to the citizens, not to out-of-town developers.</p>
Claudia Sloan	Beverly Hills, CA	2015-11-07	I grew up one block from there and don't think it's right for the neighborhood. There building a monstrosity a few blocks West. I think that's enough. Really!
Beryl Herrin	Los Angeles, CA	2015-11-07	It is too tall a building- meaning way too many people to park and even more congestion. Until all the parking and traffic is resolved-I firmly say no!
Michelle Milosh	Los Angeles, CA	2015-11-07	I live in the area and already the traffic is 10X worse than when I moved here 10 years ago. The residents do NOT want more density , which creates an increase in gridlock.Thank you.
Tamara Cascardo	Los Angeles, CA	2015-11-07	I care about the quality of living in my community
Deborah Erath	Studio City, CA	2015-11-08	I drive go to the mall and pass it every day going to work. I believe it will negative for those of us in this community and environmentally.
Daniel Irving	Los Angeles, CA	2015-11-08	This city can't even handle the residents it has. Why bring more???
Dana Jackson	Los Angeles, CA	2015-11-08	I'm signing because I live off of Sunset Blvd and this directly impacts the quality and safety of my living environment.

Name	Location	Date	Comment
MARGARET WYNN	LOS ANGELES, CA	2015-11-08	We don't need our skyline interrupted by a dangerous and disproportionate behemoth like this proposal. The area is already congested without bringing this many new residents into the neighborhood. Please stop approving developments that have no respect or appreciation for our neighborhoods' history and aesthetics.
Jeannine Braden	Los Angeles, CA	2015-11-08	Jeannine Braden
Mai Ottersen-Redfield	Los Angeles, CA	2015-11-08	I live in the area !!!!
tony payne	los angeles, CA	2015-11-08	its too much .. that is already one of the most dense and dangerous intersections in the city. its too big and will create traffic and complete gridlock. NOT a good plan
Melanie Pullen	Los Angeles, CA	2015-11-08	This will be too big for that corner. It'll be horrendous
Janelle Thibodaux	Los Angeles, CA	2015-11-08	Please, no more, Garcetti
ashley bottorff	Los Angeles, CA	2015-11-08	Live and work in the area and traffic is bad enough already!
Siobhan Carmean	Los Angeles, CA	2015-11-08	I do not support this at all, for reasons too many to just count. This is a horrible idea
Jeffery Jon Masino	Los Angeles, CA	2015-11-08	There is already the threat of too much density and lack of infrastructure in our area!
Benjamin Chang	Los Angeles, CA	2015-11-08	The project as proposed will adversely effect every aspect of our daily lives. We have been to meetings with representatives of the project and they have ignored all of our input and they do not want to work WITH us. Their only goal is to overbuild with total disregard to the communities that are in place and established.
Carol Gray	LA, CA	2015-11-08	The increased traffic will make living in w. hollywood unbearable. It already nearly is.
Philip Luque	Los Angeles, CA	2015-11-08	Already too much traffic in this area! We need better Public Transportaion not more apartments and hotels!!!
Linda Moore	Los Angeles, CA	2015-11-08	Traffic coming up and down at the intersection of Laurel Canyon and Sunset is already completely crazy. It can take 4 lights to crawl through on the best of days in rush hour. To add the number of people this will, to our already densely populated area, will cause extreme problems and vehicular danger for those of us already living here.
June Sale	Los Angeles, CA, AL	2015-11-08	The traffic now is unbearable. Adding another tall building (see La Cienga and Sunset) will add to the congestion. Enough! Enough!
Marjorie Harris	Los Angeles, CA	2015-11-08	This will impact the traffic in the Laurel Canyon area greatly.
Matthew Hutchison	West Hollywood, CA	2015-11-08	Just because Frank Gehry's name is now attached to this development does not make the huge size acceptable. I would love having a Frank Gehry building in the neighborhood, but not one that is going to dwarf every building for miles, make traffic impossible and set a precedent for the continued overdevelopment of the Sunset Strip area. Please demand a smaller, lower, more fitting complement to the neighborhood.
Lou Cutell	L.A., CA	2015-11-08	I don't agree with the massive overpowering structure as is now proposed. I have a home in the area
Paul L'Esperance	Los Angeles, CA	2015-11-08	The strip is our history
Kasia Williams	Los Angeles, CA	2015-11-08	I live in the neighborhood and would like the atmosphere of it to remain unchanged.



Name	Location	Date	Comment
Josephine Powell	Los Angeles, CA	2015-11-08	This project is too massive for that corner. In addition those of us who live one block south will suffer the consequences of grid lock traffic making it dangerous to even get out of our driveways. We are on a sloap as are all of our apartment buildings going south.
Dorothy Clark	Los Angeles, CA	2015-11-08	This is a thoughtless endeavor that will continue to compromise the neighborhoods and citizens in general..development without planning is an evil.
maria stromberg	Los Angeles, CA	2015-11-08	I'm signing because I don't want you to ruin our neighborhood. It's already too crowded and the traffic is unbearable.
will pearson	west hollywood, CA	2015-11-08	It's a bad idea for the water resource strain alone
PHILLIP ROTHSCHILD	los angeles, CA	2015-11-08	Stop the greed ! Stop the mcverticle building in Los Angeles ! Stop the corruption with the Builders to the Mayor. Stop the Neo- Cons !
Kim Walker	Los Angeles, CA	2015-11-08	<a href="mailto:Kim@Largedoor.com" rel="nofollow">Kim@Largedoor.com</a>
Allison Harris	West Hollywood, CA	2015-11-08	For God's sake protect our city from this massive tower. Our city is vibrant and beautiful, don't give into GREED that will destroy West Hollywood and only add to our already infrastructure woes.
Colin Spitler	West Hollywood, CA	2015-11-08	Please scale back this project to 100 ft. at the most
Elaine Madsen	Santa Clarita, CA	2015-11-08	I now live in West Hollywood and this development infringes on my own property investment here
maria lennon	los Angeles, CA	2015-11-08	Because i don't want more HUGE buildings here. We can barely move because of the traffic!!!! NO MORE!!!!
Kathy Evans	Los Angeles, CA	2015-11-08	I don't want it built on it will take away the character
kathleen murphy	reading, PA	2015-11-08	This proposed development impacts traffic and quality of life in a most negative manner.
Sarah Essex	Los Angeles, CA	2015-11-09	It's ridiculous to think of our neighborhood becoming an inner city brick- we CANNIT handle the population- it's not nyc- we aren't geared for it. The canyons will bare the brunt of all the traffic and ruin our lives. Go someplace less dense already!!!
Rob Lewine	Los Angeles, CA	2015-11-09	I'm signing this because I think the project is too ambitious and will increase density and traffic in an already-crowded area. Traffic in Laurel Canyon, already slow for much of the day, can only get worse.
JOAN NAGLER	Los Angeles, CA	2015-11-09	Please keep our beloved Sunset Strip free of over-development and additional traffic congestion pursuant to the proposals set forth in this petition. Thank you.
John Rodgers	West Hollywood, CA	2015-11-09	Like so many other citizens/voters of California and the United States, I am tired of corporate money superseding what is best for the citizens who pay taxes, work hard and have to live and work in our cities everyday. Politicians are selling out for that corporate money and 8150 Sunset is yet another example. This project is based on lies about traffic, density and public safety. It ignores history and is down right harmful in everyway. Is the property at 8150 Sunset Blvd. ready for new development? Yes. However, it must be good development based on the area, the citizens and the truth.
Ana Lilia	Los Angeles, CA	2015-11-09	I live on Havenhurst and do not want my neighborhood even more congested.
Monica Guevara	West Hollywood, CA	2015-11-09	This is a quality of life issue
James McEwen	Petaluma, CA	2015-11-09	I co own a home just above Sunset Blvd.
Adele Asillyman	<del>West</del> Hollywood, CA	2015-11-09	This is my neighborhood, please respect it



Name	Location	Date	Comment
John Kaye	Los Angeles, CA	2015-11-09	Eric Gacetti's a jerk and cares less for LA and its people. He has an agenda to make money from every failed business he approves like Turf Terminators. He's got to go!
Brian Wadley	Los Angeles, CA	2015-11-09	To big for this area. And bank should be saved from being torn down
Milena Simonova	West Hollywood, CA	2015-11-09	This building would ruin the skyline of Sunset Blvd.
Amy Armistead	Los Angeles, CA	2015-11-09	I care about the neighborhood where I live and work. We already deal with too much traffic from out of the area so we certainly don't need to inflict more on ourselves for the profits of developers building unaffordable housing.
Eric Lawrence	Los Angeles, CA	2015-11-09	Stop this MONSTER mistake now before it's too late !
Eric Lawrence	Los Angeles, CA	2015-11-09	Stop this MONSTER mistake now before it's too late !
Kevin Eaton	West Hollywood, CA	2015-11-09	Please rein in development within our city. This sort of monster building will cause major traffic problems and lower the quality of life in Los Angeles!
ESTHER RYDELL	Los Angeles, CA	2015-11-09	it is impossible to cross this intersection as it is now, what will we do with all the extra traffic.
James Carrington	los angeles, CA	2015-11-09	It's not needed
renee lamkie	los angeles, CA	2015-11-09	This building will destroy our current neighborhood. Too big, too many cars, too little skyline, too much of what we do not want.
Joe Viola	Los Angeles, CA	2015-11-09	I am horrified to see yet another artless project that will only add to congestion and pollution! we're going to "develope" ourselves into a health and sanity disaster.
Tony Nuccio	Los Angeles, CA	2015-11-09	Save LA ...stop developers and the development of RUBBISH structures..
Helen Berman	Los Angeles, CA	2015-11-09	This development is simply too large and too dense and will have severe negative impact on the neighborhood. Just Say No to speculator greed.
Brian Hamilton	West Hollywood, CA	2015-11-09	I live one block away from this location! Allowing such a huge height increase will begin to turn this area into another Century City. Please keep this proposal within the boundaries already established long ago for this primarily residential area.
Suzanne Good	Los Angeles, CA	2015-11-09	I'm a property owner & resident of West Hollywood Hills for over 50 Years . I have seen the area change through the years and not always for the best. However during all these changes there has not been any major improvements in the flow of traffic. I am a senior citizen & find the current situation almost unbearable. Should you approve the current plan as outlined I'm afraid I will be forced to move.
Zelda Colville	redondo beach, CA	2015-11-09	i want others to have views and it will be more aesthic pleasing

Recipient: Mayor Eric Garcetti, David Ryu, Lindsey Horvath, and Srimal Hewawitharana

Letter: Greetings,

Save Sunset Blvd! Limit the development of 8150 Sunset Blvd to 100 feet! City  
Case No. ENV-2013-2552-EIR

# Signatures

Name	Location	Date
Save the Sunset Strip	, United States	2015-11-02
Adara Salim	LOS ANGELES, CA, United States	2015-11-02
gregory widen	West Hollywood, CA, United States	2015-11-02
Allegra Riggio	West Hollywood, CA, United States	2015-11-02
Colin Vaines	Los Angeles, CA, United States	2015-11-02
Matthew Schneider	Los Angeles, CA, United States	2015-11-02
Raymond Hern	West Hollywood, CA, United States	2015-11-02
T Morgan	West Hollywood, CA, United States	2015-11-02
jana richey	Los Angeles, CA, United States	2015-11-02
Shaina Fewell	Studio City, CA, United States	2015-11-02
ALEX ROSE	Orange, CA, United States	2015-11-02
Jeremy Graef	Santa Ana, CA, United States	2015-11-02
Jeremy Graef	Los Angeles, CA, United States	2015-11-02
mary driscoll	Los Angeles, CA, United States	2015-11-02
Phil Hammond	Los Angeles, CA, United States	2015-11-02
judy christensen	San Pedro, CA, United States	2015-11-02
Mary Haskell	Los Angeles, CA, United States	2015-11-02
Seth Beard	Los Angeles, CA, United States	2015-11-02
Kathy Small	Los Angeles, CA, United States	2015-11-02
Arost Arost	Los Angeles, CA, United States	2015-11-02
Judy Stabile	Los Angeles, CA, United States	2015-11-03
Rick Farber	West Hollywood, CA, United States	2015-11-03
Megan Mullally	Los Angeles, CA, United States	2015-11-03
Karen Loewenstern	Avon, CO, United States	2015-11-03
Carolyn Driscoll	Saratoga, CA, United States	2015-11-03
Nilou Settimio	Los Angeles, CA, United States	2015-11-03
Derek Richmond	Los Angeles, CA, United States	2015-11-03
Gerry Mahaney	Naples, FL, United States	2015-11-03
Darren McMullen	Los Angeles, CA, United States	2015-11-03
Crystal Reed	Los Angeles, CA, United States	2015-11-03

Name	Location	Date
W A	Malibu, CA, United States	2015-11-03
Jeff Hyland	Beverly Hills, CA, United States	2015-11-03
Francis LaRoche	West Hollywood, CA, United States	2015-11-03
Joseph Eastwood	West Hollywood, CA, United States	2015-11-03
Giuliana Bartolotti	Los Angeles, CA, United States	2015-11-03
Robert Gray	West Hollywood, CA, United States	2015-11-03
Marianne Liggett	Venice, CA, United States	2015-11-03
Sherman Meloni	Los Angeles, CA, United States	2015-11-03
Mark Dettle	Los Angeles, CA, United States	2015-11-03
Tanya Ramlaoui	Los Angeles, CA, United States	2015-11-03
David Hammond	West Hollywood, CA, United States	2015-11-03
Kelly Spirer	Los angeles, CA, United States	2015-11-03
Tony Tucci	Beverly Hills, CA, United States	2015-11-03
Elizabeth Ziegler	Los Angeles, CA, United States	2015-11-03
david gold	West Hollywood, CA, United States	2015-11-03
Diane Lander Simon	Los Angeles, CA, United States	2015-11-03
Elyse Eisenberg	West Hollywood, CA, United States	2015-11-03
SUELLEN Wagner	Studio City, CA, United States	2015-11-03
AR Horton	Los Angeles, CA, United States	2015-11-03
Melody St John	Los Angeles, CA, United States	2015-11-03
Michael Vilkin	Santa Barbara, CA, United States	2015-11-03
Jack Humphreville	Los Angeles, CA, United States	2015-11-03
Cathy Wayne	Los Angeles, CA, United States	2015-11-03
Lynda Barens	West Hollywood, CA, United States	2015-11-03
Bradford Cobb	West Hollywood, CA, United States	2015-11-03
Martin Hammond	Cupertino, CA, United States	2015-11-03
Alison Simard	Los Angeles, CA, United States	2015-11-03
Amy Aversa	Brooklyn, NY, United States	2015-11-03
M.S. Epstein	Los Angeles, CA, United States	2015-11-03
Catherine Sullivan	ILos Angeles, CA, United States	2015-11-03
Seth Meier	West Hollywood, CA, United States	2015-11-03
Marty Belafsky	Los Angeles, CA, United States	2015-11-03

Name	Location	Date
Michael Testa	West Hollywood, CA, United States	2015-11-03
Melissa Susac	Los Angeles, CA, United States	2015-11-03
Jaime Schoenbrun	Santee, CA, United States	2015-11-03
Barbara Gullo	Beverly Hills, CA, United States	2015-11-03
Tom Moore	West Hollywood, CA, United States	2015-11-03
Talisa Reeve	Malibu, CA, United States	2015-11-03
John Bollard	West Hollywood, CA, United States	2015-11-03
Renetta Amador	Los Angeles, CA, United States	2015-11-03
Javier Rodriguez	Los Angeles, CA, United States	2015-11-03
Mitch Goodman	Palm Springs, CA, United States	2015-11-03
PATRICK TENNANT	Los Angeles, CA, United States	2015-11-03
sherry sexton	West Hollywood, CA, United States	2015-11-03
Jessica Wisnowski	Los Angeles, CA, United States	2015-11-03
Peter Spirer	Los Angeles, CA, United States	2015-11-03
Diane Cary	West Hollywood, CA, United States	2015-11-03
Draco Rosa	West Hollywood, CA, United States	2015-11-03
Anna Nuttall	Epsom, ENG, United Kingdom	2015-11-03
Craig Clark	Los Angeles, CA, United States	2015-11-03
Francisco Arbolay	Caguas, United States	2015-11-03
Paz González	Mexico	2015-11-03
sean newberg	Studio City, CA, United States	2015-11-03
Andrew Macpherson	West Hollywood, CA, United States	2015-11-03
Michael Black	Beverly Hills, CA, United States	2015-11-03
Eleanor Sabaduquia	West Hollywood, CA, United States	2015-11-03
joanna cassidy	Studio City, CA, United States	2015-11-03
Norma Jimenez	Schertz, TX, United States	2015-11-03
Fiona Jackson	Hamilton, New Zealand	2015-11-03
Michael Grace	Los Angeles, CA, United States	2015-11-03
James teel	Los Angeles, CA, United States	2015-11-03
Douglas Dickerman	Los Angeles, CA, United States	2015-11-03
rivkind michael	Los Angeles, CA, United States	2015-11-03
Billie Mahaney	Annandale, NJ, United States	2015-11-03

Name	Location	Date
Doria Biddle	West Hollywood, CA, United States	2015-11-03
matt dines	Los Angeles, CA, United States	2015-11-03
Stacy Title	Los Angeles, CA, United States	2015-11-03
michele de villiers	Los Angeles, CA, United States	2015-11-03
Dawn Clark	Los Angeles, CA, United States	2015-11-03
Cristie St James	Beverly Hills, CA, United States	2015-11-03
Julia Cunningham	Los Angeles, CA, United States	2015-11-03
Deborah Kaufman	Los Angeles, CA, United States	2015-11-04
Michael Katcher	San Bruno, CA, United States	2015-11-04
jamie burris	Los Angeles, CA, United States	2015-11-04
Leslie Sank	Beverly Hills, CA, United States	2015-11-04
Laura Mulrenan	Los Angeles, CA, United States	2015-11-04
Dee Dee Schneider	Los Angeles, CA, United States	2015-11-04
Martin Schneider	Los Angeles, CA, United States	2015-11-04
Clarissa Troop	Los Angeles, CA, United States	2015-11-04
Lisa Diaz	Los Angeles, CA, United States	2015-11-04
lucy webb	Los Angeles, CA, United States	2015-11-04
Deborah MAY	North Hollywood, CA, United States	2015-11-04
Lloyd Arnold	Los Angeles, CA, United States	2015-11-04
Robert Ortiz	Phoenix, AZ, United States	2015-11-04
Eric Holck	Los Angeles, CA, United States	2015-11-04
Nikki Wood	Los Angeles, CA, United States	2015-11-04
Robin Diaz	Los Angeles, CA, United States	2015-11-04
Aaron Heck	Los Angeles, CA, United States	2015-11-04
Lisa Parks	La Fayette, GA, United States	2015-11-04
Maritza Quiroz	Los Angeles, CA, United States	2015-11-04
Christopher Rice	West Hollywood, CA, United States	2015-11-04
Lauren Sandoval	Los Angeles, CA, United States	2015-11-04
Deborah Gaynor	Wake Forest, NC, United States	2015-11-04
Dimitri Perparos	Los Angeles, CA, United States	2015-11-04
Lisa Schultz	Brighton, CO, United States	2015-11-04
albert hughes	Los Angeles, CA, United States	2015-11-04

Name	Location	Date
Michael Leeson	Los Angeles, CA, United States	2015-11-04
Amber Myers	Severna Park, MD, United States	2015-11-04
Brian Lynch	Los Angeles, CA, United States	2015-11-04
Harker Jones	Los Angeles, CA, United States	2015-11-04
Anna Wick	Los Angeles, CA, United States	2015-11-04
Melody John	Los Angeles, CA, United States	2015-11-04
Marne Carmean	West Hollywood, CA, United States	2015-11-04
David Alexandre	richardson, TX, United States	2015-11-04
Lee Clay	Los Angeles, CA, United States	2015-11-04
Scott Voliva	West Hollywood, CA, United States	2015-11-04
Lisa Hsu	Los Angeles, CA, United States	2015-11-04
Stephanie Savage	Los Angeles, CA, United States	2015-11-04
michael shores	West Hollywood, CA, United States	2015-11-04
Robert Lea	West Hollywood, CA, United States	2015-11-04
Serena Reid	LOS ANGELES, CA, United States	2015-11-04
Vanessa Beletic	Los Angeles, CA, United States	2015-11-04
mike rice	newport beach, CA, United States	2015-11-04
Marieke Boorman	Los Angeles, CA, United States	2015-11-04
Deborah Fairchild	Los Angeles, CA, United States	2015-11-04
Grayson Edwards	Los Angeles, CA, United States	2015-11-04
Burt Goralnick	West Hollywood, CA, United States	2015-11-04
Fab Brandt	Los Angeles, CA, United States	2015-11-04
Victoria Miller	Los Angeles, CA, United States	2015-11-04
Deborah Davis-Bonk	Los Angeles, CA, United States	2015-11-04
Muriel Wheatley	Los Angeles, CA, United States	2015-11-04
Marci Levine	Los Angeles, CA, United States	2015-11-04
Mikheal Meece	Dublin, CA, United States	2015-11-04
Keiko-Marierose Shores	West Hollywood, CA, United States	2015-11-04
Yoav Getzler	Valley Village, CA, United States	2015-11-04
Jeff Deperon	Los Angeles, CA, United States	2015-11-04
Joanna Pitt	Los Angeles, CA, United States	2015-11-04
Lenny Lipton	Los Angeles, CA, United States	2015-11-04

Name	Location	Date
Sabine La Folie	Culver City, CA, United States	2015-11-04
Paulo Derezende	Los Angeles, CA, United States	2015-11-04
Richard Lawton	Los Angeles, CA, United States	2015-11-04
Marcy McLeod	Los Angeles, CA, United States	2015-11-04
Olanna Taskey	West Hollywood, CA, United States	2015-11-04
Angela Alvarado	Los Angeles, CA, United States	2015-11-05
jennifer doud	los angeles, CA, United States	2015-11-05
Joy Barr	Los Angeles, CA, United States	2015-11-05
Jane Lockhart	West Hollywood, CA, United States	2015-11-05
Mimi Bonetti	Los Angeles, CA, United States	2015-11-05
Phyllis Ross	Los Angeles, CA, United States	2015-11-05
Elaine Gilboa	Los Angeles, CA, United States	2015-11-05
Barry Johnson	Studio City, CA, United States	2015-11-05
Christina Odegard	Los Angeles, CA, United States	2015-11-05
Kris Van Kaeden	Fullerton, CA, United States	2015-11-05
Bernard Judge	Los Angeles, CA, United States	2015-11-05
Cesar Orozco	Bell Gardens, CA, United States	2015-11-05
Eva M. Ballo	Los Angeles, CA, United States	2015-11-05
Anne Curry	Los Angeles, CA, United States	2015-11-05
Sandra Clare	Long Beach, CA, United States	2015-11-05
Helen Carmean	Los Angeles, CA, United States	2015-11-05
Masha Stout	Los Angeles, CA, United States	2015-11-05
dolores scozzesi	West Hollywood, CA, United States	2015-11-05
Marianne Giblin	Los Angeles, CA, United States	2015-11-05
Courtney Small	Los Angeles, CA, United States	2015-11-05
Eric Shaw Quinn Quinn	West Hollywood, CA, United States	2015-11-05
Taylor Cornish	San Francisco, CA, United States	2015-11-05
Michael Isaacs	Johnson City, TN, United States	2015-11-05
John Stabile	Los Angeles, CA, United States	2015-11-05
David Romero	West Hollywood, CA, United States	2015-11-05
Angelina Shamborska	Long Beach, CA, United States	2015-11-05
Susan Lavitt	Los Angeles, CA, United States	2015-11-05



Name	Location	Date
Jackson Flanders	Studio City, CA, United States	2015-11-05
Kira Sardy	West Hollywood, CA, United States	2015-11-05
kimberly rose	Studio City, CA, United States	2015-11-05
David Miramontes	West Hollywood, CA, United States	2015-11-05
Lisa Marie Viggiano	Malibu, CA, United States	2015-11-05
Erica Spano	Excelsior, MN, United States	2015-11-05
Ben Nichols	Los Angeles, CA, United States	2015-11-05
Ben Stout	Los Angeles, CA, United States	2015-11-05
Maryanne Holmes	San Juan Capistrano, CA, United States	2015-11-05
Jacqueline Beaulieu	Los Angeles, CA, United States	2015-11-05
Kelly Forbes	Los Angeles, CA, United States	2015-11-05
Brian Linse	Los Angeles, CA, United States	2015-11-05
Andrea Lehman	Los Angeles, CA, United States	2015-11-05
Elizabeth Cronin	Studio City, CA, United States	2015-11-05
christy bell	Los Angeles, CA, United States	2015-11-05
Sandra Hitt	Los Angeles, CA, United States	2015-11-05
Matthew Friedman	Los Angeles, CA, United States	2015-11-05
Joe Kay	Los Angeles, CA, United States	2015-11-05
Kristen Stavola	Los Angeles, CA, United States	2015-11-05
Kim Kaufman	Los Angeles, CA, United States	2015-11-05
Robert Chavers	Los Angeles, CA, United States	2015-11-05
Sierra Pecheur	Los Angeles, CA, United States	2015-11-05
Marilyn price	Stratford-upon-Avon, ENG, United Kingdom	2015-11-05
Elias Cameron	Worcester, ENG, United Kingdom	2015-11-05
Michael Hoover	Los Angeles, CA, United States	2015-11-05
Lelani Eickhoff	Simi Valley, CA, United States	2015-11-06
Lori Wallman	Los Angeles, CA, United States	2015-11-06
Christopher ROWLEY	Los Angeles, CA, United States	2015-11-06
linda marder	I.a., CA, United States	2015-11-06
Claire Barthelemy	West Hollywood, CA, United States	2015-11-06
Chloe Palmer	Los Angeles, CA, United States	2015-11-06
Sharon Scott	Simi Valley, CA, United States	2015-11-06

Name	Location	Date
Diane Laskin	L.A., CA, United States	2015-11-06
Jack Fitz	Los Angeles, CA, United States	2015-11-06
Susanne Konigsberg	Los Angeles, CA, United States	2015-11-06
Deborah Rankin	Los Angeles, CA, United States	2015-11-06
Alex Nicholas	Los Angeles, CA, United States	2015-11-06
Inna Gergel	Granada Hills, CA, United States	2015-11-06
Wendel Meldrum	los angeles, CA, United States	2015-11-06
Ronald Maxson	Los Angeles, CA, United States	2015-11-06
Monica Fishman	Carpinteria, CA, United States	2015-11-06
Daniel Son	San Francisco, CA, United States	2015-11-06
Danna Ruscha	Beverly Hills, CA, United States	2015-11-06
Jessica Nesic	Los Angeles, CA, United States	2015-11-06
Jaren boczan	Los Angeles, CA, United States	2015-11-06
Paul m kim	Alhambra, CA, United States	2015-11-06
Cinnia Finfer	Los Angeles, CA, United States	2015-11-06
Rob Osattin	Atlanta, GA, United States	2015-11-06
Sandrine Fuchs	Los Angeles, CA, United States	2015-11-06
Regina Welch	Los Angeles, CA, United States	2015-11-06
Tyler Naifeh	Los Angeles, CA, United States	2015-11-06
Eric chon	Torrance, CA, United States	2015-11-06
Inoo Cha	Englewood Cliffs, NJ, United States	2015-11-06
Alan Hadaya	West Hollywood, CA, United States	2015-11-06
David Neely	Los Angeles, CA, United States	2015-11-06
Brooke Funderburk	Los Angeles, CA, United States	2015-11-06
Chris Brewster	Los Angeles, CA, United States	2015-11-06
Lydia Dubois W	Los Angeles, CA, United States	2015-11-06
ROBERT MEADOWS	West Hollywood, CA, United States	2015-11-06
Gayle Kelley	Los Angeles, CA, United States	2015-11-07
Viktoria Cornelius	Los Angeles, CA, United States	2015-11-07
Dorothy Rand	Los Angeles, CA, United States	2015-11-07
Cheyenne Gustason	Los Angeles, CA, United States	2015-11-07
G Morris	Venice, CA, United States	2015-11-07

Name	Location	Date
Claudia Sloan	Beverly Hills, CA, United States	2015-11-07
Minsu Kang	Torrance, CA, United States	2015-11-07
Priya Ghai	West Hollywood, CA, United States	2015-11-07
Beryl Herrin	Los Angeles, CA, United States	2015-11-07
Todd Waks	Los Angeles, CA, United States	2015-11-07
Art Manke	Los Angeles, CA, United States	2015-11-07
Michelle Milosh	Los Angeles, CA, United States	2015-11-07
Tranna Salim	Denver, CO, United States	2015-11-07
Tamara Cascardo	Los Angeles, CA, United States	2015-11-07
Billy Childers	West Hollywood, CA, United States	2015-11-07
Jill Kraft	Los Angeles, CA, United States	2015-11-07
Eran Shine	Los Angeles, CA, United States	2015-11-07
bryan wark	los angeles, CA, United States	2015-11-07
Deborah Erath	Studio City, CA, United States	2015-11-08
Teresa Conroy	Los Angeles, CA, United States	2015-11-08
Janie fitzgerald	Los Angeles, CA, United States	2015-11-08
Jessica Walker	Los Angeles, CA, United States	2015-11-08
Elodie Brulere-Powers	Glendale, CA, United States	2015-11-08
Daniel Irving	Los Angeles, CA, United States	2015-11-08
sarah mcneilly	Los Angeles, CA, United States	2015-11-08
Jillian Sorkin	West Hollywood, CA, United States	2015-11-08
Dana Jackson	Los Angeles, CA, United States	2015-11-08
MARGARET WYNN	LOS ANGELES, CA, United States	2015-11-08
Rosemarie Cobin	Los Angeles, CA, United States	2015-11-08
Nathaniel Hunt	Studio City, CA, United States	2015-11-08
Pam Boland	Grovetown, GA, United States	2015-11-08
Jeannine Braden	Los Angeles, CA, United States	2015-11-08
Jennifer Jay	West Hollywood, CA, United States	2015-11-08
Mai Ottersen-Redfield	Los Angeles, CA, United States	2015-11-08
Ralf Knoll	West Hollywood, CA, United States	2015-11-08
tony payne	los angeles, CA, United States	2015-11-08
Christian Schmitz	Beverly Hills, CA, United States	2015-11-08

Name	Location	Date
Richard Redfield	Los Angeles, CA, United States	2015-11-08
Adam Borich	Los Angeles, CA, United States	2015-11-08
Klazina crawford	Los Angeles, CA, United States	2015-11-08
Melanie Pullen	Los Angeles, CA, United States	2015-11-08
Janelle Thibodaux	Los Angeles, CA, United States	2015-11-08
Ragen Wilfert	Los Angeles, CA, United States	2015-11-08
Chance Starling	Los Angeles, CA, United States	2015-11-08
ashley bottorff	Los Angeles, CA, United States	2015-11-08
Fred Selden	West Hollywood, CA, United States	2015-11-08
Karen Rocchio	Los Angeles, CA, United States	2015-11-08
Steve Anderson	Los Angeles, CA, United States	2015-11-08
Siobhan Carmean	Los Angeles, CA, United States	2015-11-08
Karen Berch	Los Angeles, CA, United States	2015-11-08
Jeffery Jon Masino	Los Angeles, CA, United States	2015-11-08
Robert ONeill	Los Angeles, CA, United States	2015-11-08
Benjamin Chang	Los Angeles, CA, United States	2015-11-08
Carol Gray	West Hollywood, CA, United States	2015-11-08
robert wilson	West Hollywood, CA, United States	2015-11-08
Philip Luque	Los Angeles, CA, United States	2015-11-08
James Bontempo	Los Angeles, CA, United States	2015-11-08
Linda Moore	Los Angeles, CA, United States	2015-11-08
maria gritsch	la, CA, United States	2015-11-08
adam baer	Los Angeles, CA, United States	2015-11-08
Julia Miller	West Hollywood, CA, United States	2015-11-08
Janet Eckholm	Los Angeles, CA, United States	2015-11-08
June Sale	West Hollywood, CA, United States	2015-11-08
Kyrstin Munson	Los Angeles, CA, United States	2015-11-08
Marilyn Lawenda	Los Angeles, CA, United States	2015-11-08
Marjorie Harris	Los Angeles, CA, United States	2015-11-08
Matthew Hutchison	Los Angeles, CA, United States	2015-11-08
Alena Zdorovchenko	West Hollywood, CA, United States	2015-11-08
Lou Cutell	L.A., CA, United States	2015-11-08

Name	Location	Date
Paul L'Esperance	Los Angeles, CA, United States	2015-11-08
Celia Wyatt-Twiss	Los angeles, CA, United States	2015-11-08
Mark Andrew	Los Angeles, CA, United States	2015-11-08
Kasia Williams	Los Angeles, CA, United States	2015-11-08
Linda Kay	Los Angeles, CA, United States	2015-11-08
Ellen Frankel	Los Angeles, CA, United States	2015-11-08
Josephine Powell	Los Angeles, CA, United States	2015-11-08
wayne marmorstein	West Hollywood, CA, United States	2015-11-08
Dorothy Clark	Los Angeles, CA, United States	2015-11-08
Mary Coley	Los Angeles, CA, United States	2015-11-08
Joan temple	Los Angeles, CA, United States	2015-11-08
linda boyd	LA, CA, United States	2015-11-08
Diane Berliner	Los Angeles, Virgin Islands, U.S.	2015-11-08
Maria Stromberg	Los Angeles, CA, United States	2015-11-08
David Bagley	Los Angeles, CA, United States	2015-11-08
will pearson	west hollywood, CA, United States	2015-11-08
Marla Miller	Los Angeles, CA, United States	2015-11-08
PHILLIP ROTHSCHILD	los angeles, CA, United States	2015-11-08
Jason Shaw	Los Angeles, CA, United States	2015-11-08
Ruth Wald	Los Angeles, CA, United States	2015-11-08
Jennifer Sidary	Los Angeles, CA, United States	2015-11-08
Robyn Weisman	Los Angeles, CA, United States	2015-11-08
Kim Gottlieb-Walker	Los Angeles, CA, United States	2015-11-08
Michelle Rouse	Auckland, New Zealand	2015-11-08
Allison Harris	West Hollywood, CA, United States	2015-11-08
Colin Spitler	West Hollywood, CA, United States	2015-11-08
Raymond Fitzpatrick	West Hollywood, CA, United States	2015-11-08
Elaine Madsen	Santa Clarita, CA, United States	2015-11-08
Matthew OConnor	West Hollywood, CA, United States	2015-11-08
maria lennon	Los Angeles, CA, United States	2015-11-08
Kathy Evans	Los Angeles, CA, United States	2015-11-08
kathleen murphy	Los Angeles, CA, United States	2015-11-08

Name	Location	Date
Debbie Starkman	Los Angeles, CA, United States	2015-11-09
Arnie Semsky	Los Angeles, CA, United States	2015-11-09
Alan Robinson	Monterey Park, CA, United States	2015-11-09
Shira Boardman	Los Angeles, CA, United States	2015-11-09
Lisa Moore	Los Angeles, CA, United States	2015-11-09
Sarah Essex	Los Angeles, CA, United States	2015-11-09
Rob Lewine	Los Angeles, CA, United States	2015-11-09
David Forrest	Los Angeles, CA, United States	2015-11-09
JOAN NAGLER	Los Angeles, CA, United States	2015-11-09
John Rodgers	West Hollywood, CA, United States	2015-11-09
Florence Ratzsch	Los Angeles, CA, United States	2015-11-09
Clark Eddy	Los Angeles, CA, United States	2015-11-09
Sophie Ratzsch	Los Angeles, CA, United States	2015-11-09
B. Akerlund	Los Angeles, CA, United States	2015-11-09
Richard Holland	Los Angeles, CA, United States	2015-11-09
Ece Kucukkoylu	Los Angeles, CA, United States	2015-11-09
Eric Lawrence	Los Angeles, CA, United States	2015-11-09
Ana Lilia	Los Angeles, CA, United States	2015-11-09
Kathleen Angelini	Van Nuys, CA, United States	2015-11-09
Monica Guevara	West Hollywood, CA, United States	2015-11-09
Janna Zinzi	Los Angeles, CA, United States	2015-11-09
Shoshanah Wolfson	New York, NY, United States	2015-11-09
Rob Rains	Farmington, UT, United States	2015-11-09
Julia S. Russell	Los Angeles, CA, United States	2015-11-09
James McEwen	Petaluma, CA, United States	2015-11-09
Adele Sillyman	Los Angeles, CA, United States	2015-11-09
Olivia Ratzsch	Brooklyn, NY, United States	2015-11-09
John Kaye	Los Angeles, CA, United States	2015-11-09
Marc Fogel	Los Angeles, CA, United States	2015-11-09
Devon Brooks	West Hollywood, CA, United States	2015-11-09
Julie Moran	West Hollywood, CA, United States	2015-11-09
Kristian Monday	Los Angeles, CA, United States	2015-11-09

Name	Location	Date
Yana Trofimova	West Hollywood, CA, United States	2015-11-09
Adrianne Duncan	Los Angeles, CA, United States	2015-11-09
Florian Schaugg	Los Angeles, CA, United States	2015-11-09
Marina Pokrovskaya	North Hollywood, CA, United States	2015-11-09
Brian Wadley	Los Angeles, CA, United States	2015-11-09
Darlene Chan	West Hollywood, CA, United States	2015-11-09
Jason Brown	Los Angeles, CA, United States	2015-11-09
Kent Belden	Los Angeles, CA, United States	2015-11-09
Dessa Sfikas	Los Angeles, CA, United States	2015-11-09
Kevin Kane	Los Angeles, CA, United States	2015-11-09
sarah petrie	Los Angeles, CA, United States	2015-11-09
Alan Henderson	Los Angeles, CA, United States	2015-11-09
Fernando Leyva	La Puente, CA, United States	2015-11-09
Glenn Williamson	Los Angeles, CA, United States	2015-11-09
Milena Simonova	West Hollywood, CA, United States	2015-11-09
Rena Falk	Los Angeles, CA, United States	2015-11-09
wadley wadley	Los Angeles, CA, United States	2015-11-09
erika meier	Los Angeles, CA, United States	2015-11-09

**LETTER B35**

Planning Environmental Review &lt;planning.envreview@lacity.org&gt;

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**City Case No. ENV-2013-2552-EIR/8150 Sunset Boulevard**

2 messages

**Save Residential Hollywood** <saveresidentialhollywood@gmail.com>

Mon, Nov 9, 2015 at 1:20 PM

To: planning.envreview@lacity.org

Cc: david.ryu@lacity.org, "mayor.garcetti@lacity.com" &lt;mayor.garcetti@lacity.com&gt;

Dear Ms. Hewawitharana,

Attached is a letter from Save Residential Hollywood, Inc. incorporating our comments regarding the proposed development and requesting that the EIR be rejected and the developer provide a new EIR which more accurately reflects the scope of the project and the deleterious impact it will have on our neighborhood if it is permitted to be built in its present incarnation.

Thank you.

Helen Berman  
President  
Save Residential Hollywood, Inc.

**Comment Letter 8150 Sunset Nov 2015.pdf**

107K

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**Planning Environmental Review** <planning.envreview@lacity.org>

Mon, Nov 9, 2015 at 1:20 PM

To: saveresidentialhollywood@gmail.com

Thank you for submitting your comments. They have been received and will be included in the administrative record for the Environmental Impact Report (EIR).

*This reply is automatically generated and this mailbox is only actively monitored during an EIR's public comment period. If you have specific questions or would like an immediate response, please contact the project planner identified on the notice directly.*





November 8, 2015

Srimal Hewawitharana  
Environmental Analysis Section  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, California 90012

Case Number:           **City Case No. ENV-2013-2552-EIR/8150 Sunset Boulevard**

Dear Ms. Hewawitharana:

I am writing on behalf of Save Residential Hollywood, Inc., a non-profit organization representing more than 1500 residents in the area impacted by the proposed development. Our organization opposes the EIR submitted by the developer for the proposed project at 8150 Sunset Blvd (City Case No. ENV-2013-2552-EIR).

The EIR fails to adequately address issues with this overly large and dense project situated on an already congested intersection directly at the bottom of Laurel Canyon. The proposed development is completely out of scale with the surrounding area and will have severe adverse impacts on the neighborhood and its residents as well as the numerous commuters who use Sunset Boulevard, Laurel Canyon, Crescent Heights and adjacent streets to traverse the city to perform normal tasks of life. We also are worried about the impact the increased congestion will have on the ability of emergency personnel to respond in a timely manner.

We request you do not approve the proposed EIR and require the developers submit a new EIR that adequately addresses the real problems caused by this development.

Our specific issues with the development include, but are not limited to, the following:

**HEIGHT:** The proposed skyscraper with a height of 234 feet is three times the height of nearby structures like the DGA building (79 feet) and would be the largest building on Sunset Boulevard, dwarfing the surrounding buildings and is completely out of scale with the character of the neighborhood. Besides overshadowing other buildings in the area, it will block iconic views of the Hollywood Hills which are one of Los Angeles' and the nation's great national treasures.

**TRAFFIC:** The Traffic study appears to be completely flawed with significant understatement of car trips generated. The congestion caused by this development is particularly ill suited for an already over burdened key intersection. Any traffic study based on significant impact of bicycle riders in lieu of automobile usage should include a study with accurate figures indicating what percentage of people living, working or utilizing the upscale development will utilize bicycles as their primary form of transportation. This is an area that is not particularly well served by public transportation, as there are sporadic bus lines. Moreover, studies have shown busses in Los Angeles are used by the least affluent residents of our city as transportation of last resort and there is nothing submitted which would provide believable evidence that the affluent population utilizing this development would differ in their transportation habits from those of other residents in the neighborhood or Los Angeles.

**PEDESTRIAN SAFETY:** Eliminating the traffic island is a cynical gift to the developers so as to enable them to provide the legally required minimum set back. This is a dangerous pedestrian intersection and eliminating the island will increase danger. It will also increase congestion at the intersection, as right turns to Crescent Heights from Sunset will be more difficult to maneuver and impede the flow of traffic. Moreover pedestrian crossings will cause heavy backups on Sunset Boulevard heading east. The traffic island should stay owned by the city and not be gifted to the developer.

For all of these reasons and more, Save Residential Hollywood urges you to reject the EIR and require the development to submit an EIR that adequately addresses the reality of the severe burden this development will place on our neighborhood.

Very truly yours,



Helen Berman  
President  
Save Residential Hollywood, Inc.

cc: Mayor Garcetti  
Councilman David Ryu

**LETTER B36**

Planning Environmental Review &lt;planning.envreview@lacity.org&gt;

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**RDEIR of 8150 Sunset**

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**Jamie Hall** <jhall@laurelcanyon.org>

Mon, Nov 9, 2015 at 5:22 PM

To: Srimal Hewawitharana &lt;srimal.hewawitharana@lacity.org&gt;

Cc: planning.envreview@lacity.org, Christopher Rice <c.rice78@yahoo.com>, Ric Abramson <ric@workplays.com>, Marla Miller <marla1008@yahoo.com>, Jerry Ptashkin <ptashkin@aol.com>, Ebon Alabastur <alabastur@aol.com>, Lynn Russell <lenabydesign@mac.com>, Rory Barish <n2swimng@aol.com>, Cyd Zeigler <cydzeiglerjr@gmail.com>, Scott Lunceford <slunceford@weho.org>, Anastasia Mann <anastasia@corniche.com>, Adara Salim <adarasalim@gmail.com>, Marian Dodge <president@hillsidefederation.org>, Jamie Hall <jamie@jamiethall.com>, Karen Demille <karendemille@gmail.com>, Grafton Tanquary <gpt1287@sbcglobal.net>, david.ryu@lacity.org, Renee Weitzer <renee.weitzer@lacity.org>, Julia Duncan <julia.duncan@lacity.org>, Travis Longcore <tlongcore@babcn.org>, Orrin Feldman <ofeldman@pacbell.net>

Please see attached.

Regards,

Jamie T. Hall

**Laurel Canyon Association***President*

(323) 380-0845 office

(512) 619-4645 cell

jhall@laurelcanyon.org email

www.laurelcanyon.org web

**8150 Sunset Blvd EIR Comment Letter.pdf**

660K



*A Community Organization Dedicated to Improving and Preserving  
the Quality of Life in Laurel Canyon*

November 9, 2015

**VIA E-MAIL**

Srimal Hewawitharana  
Environmental Analysis Section  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, California 90012  
srimal.hewawitharana@lacity.org

**Re: Comments in Response to ENV-2013-2552-EIR (Sunset Boulevard  
Mixed-Use Project located at 8150 Sunset Boulevard)**

Dear Ms. Srimal:

I am in receipt of the Notice of Extension (“NOE”) dated October 21, 2015 for the Sunset Boulevard Mixed-Use Project located at 8150 Sunset Boulevard (“Project”). As the President of the Laurel Canyon Association (“LCA”) I am pleased to provide comments in response to the draft Environmental Impact Report (“DEIR”) prepared for the Project.

**About Laurel Canyon Association**

Initially, and by way of background, I would like to provide some background. LCA is a neighborhood association serving the area of the Hollywood Hills known as “Laurel Canyon,” one of the most beautiful and environmentally important areas of Los Angeles. The hills in Laurel Canyon provide a scenic backdrop for the rest of Los Angeles. Further Laurel Canyon’s forested valleys and chaparral-draped hillsides offer habitat for native wildlife. Laurel Canyon also is home to a watershed and greenbelt for the vastly developed plains of Los Angeles and the San Fernando Valley.

LCA was founded for the express purpose of preserving and improving the quality of life in Laurel Canyon. The goal of our community group is to promote the welfare of the residents of Laurel Canyon and to maintain the quality of life in the Hollywood Hills, by preserving its residential character, its quiet, privacy, natural beauty and safety. Moreover, LCA endeavors to encourage cooperation among all residents and

**Tel: 310-982-1760  
Email: [jhall@laurelcanyon.org](mailto:jhall@laurelcanyon.org)**

to educate appropriate governmental bodies concerning changes in existing or proposed laws affecting Laurel Canyon or in anything that affects the local community.

LCA's jurisdiction includes Laurel Canyon Boulevard, its feeder streets and the Kirkwood, Stanley Hills, Lookout Mountain and Wonderland bowl areas. The neighborhood is bounded on the north by Mulholland Drive and at the south by Hollywood Boulevard. The main streets are Laurel Canyon Boulevard, Mulholland Drive, Wonderland Avenue, Lookout Mountain Avenue, Kirkwood, and Stanley Hills. LCA is a residential stakeholder with membership in the Los Angeles Neighborhood Council system, specifically, the Bel-Air Beverly Crest Neighborhood Council ("BABCNC").

#### Incorporation of Comments Provided by Save Sunset Boulevard

LCA has read the letter of protest submitted by Save Sunset Boulevard ("SSB"), an organization founded to promote responsible development along Sunset Blvd. and to raise awareness of the impacts of large developments on nearby communities. LCA supports the comments and concerns raised by SSB.

#### Environmental Issues Implicated by Project

For decades, residents of LCA have patronized stores located at 8150 Sunset Boulevard. Moreover, each day thousands of residents pass by the property on their way to work, visit friends and shop and school. The flow of traffic at the intersection of Sunset Boulevard and Crescent Heights/Laurel Canyon Boulevard is of paramount concern to LCA.

LCA offers the following comments:

*Traffic/Transportation:* The traffic study prepared needs to be redrawn as it is not accurate now that the design has changed significantly. The intersection of Crescent Heights and Sunset is severely congested and the impacts associated with the Project are unknown without an adequate traffic study,

*Visual Impacts:* The Project is even taller than the previous design. The City has failed to adequately analyze the significant visual impacts associated with the Project. The project should be limited to approximately 100 feet. Otherwise it will block the skyline, an irreplaceable natural resource.

*Setbacks:* The proposed 4-foot setback along crescent heights will make the building loom over the area.

*Noise:* The applicant should measure the ambient noise levels in the Hollywood Hills to assess the impact that the Project will have on residents who reside in the hills. Specifically, ambient noise levels should be measures on Grand View Drive, both during the day and night.

Please don't hesitate to contact me if you have any questions or comments. I may be reached at 310-982-1760 or [jhall@laurelcanyon.org](mailto:jhall@laurelcanyon.org).

Regards,

A handwritten signature in black ink, appearing to read 'Jamie T. Hall', with a stylized, cursive script.

Jamie T. Hall  
Laurel Canyon Association  
President

**LETTER B37**

Planning Environmental Review &lt;planning.envreview@lacity.org&gt;

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**8150 Sunset Blvd. Recirculated DEIR - ENV-2013-2552-EIR**

2 messages

**RosenFree@aol.com** <RosenFree@aol.com>

Mon, Nov 9, 2015 at 1:32 AM

To: Simal.hewawitharana@lacity.org, planning.envreview@lacity.org

Cc: david.ryu@lacity.org, mayor.garcetti@lacity.org, renee.weitzer@lacity.org, cd4.issues@lacity.org, sarah.dusseault@lacity.org, julia.duncan@lacity.org

Dear Ms. Hewawitharana:

Attached is the letter from the Hillside Federation commenting on the recirculated Draft EIR for the project at 8150 W. Sunset Blvd. Please add it to you file and include the Hillside Federation on any and all notification lists for the project.

Thank you very much.

Best regards,

Wendy-Sue Rosen, Vice President  
Federation of Hillside and Canyon Associations  
[www.hillsidefederation.org](http://www.hillsidefederation.org)

**HF 8150 Comment Letter 11-9-15.pdf**

310K

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**Planning Environmental Review** <planning.envreview@lacity.org>

Mon, Nov 9, 2015 at 1:32 AM

To: RosenFree@aol.com

Thank you for submitting your comments. They have been received and will be included in the administrative record for the Environmental Impact Report (EIR).

*This reply is automatically generated and this mailbox is only actively monitored during an EIR's public comment period. If you have specific questions or would like an immediate response, please contact the project planner identified on the notice directly.*

P.O. Box 27404  
Los Angeles, CA 90027  
[www.hillsidefederation.org](http://www.hillsidefederation.org)



PRESIDENT  
Marian Dodge  
CHAIRMAN  
Charley Mims  
VICE PRESIDENTS  
Mark Stratton  
Wendy-Sue Rosen  
SECRETARIES  
Carol Sidlow  
John Given  
TREASURER  
Don Andres

Srimal Hewawitharana  
Environmental Analysis Section  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, California 90012

November 9, 2015

Beachwood Canyon Neighborhood  
Bel-Air Association  
Bel Air Knolls Property Owners  
Bel Air Skycrest Property Owners  
Benedict Canyon Association  
Brentwood Hills Homeowners  
Brentwood Residents Coalition  
Cahuenga Pass Property Owners  
Canyon Back Alliance  
CASM-SFV  
Crests Neighborhood Assn.  
Franklin Ave./Hollywood Bl. West  
Franklin Hills Residents Assn.  
Highlands Owners Assn.  
Hollywood Dell Civic Assn.  
Hollywood Heights Assn.  
Hollywoodland Homeowners  
Holmby Hills Homeowners Assn.  
Kagel Canyon Civic Assn.  
Lake Hollywood HOA  
Laurel Canyon Assn.  
Lookout Mountain Alliance  
Los Feliz Improvement Assn.  
Mt. Olympus Property Owners  
Mt. Washington Homeowners All.  
Nichols Canyon Assn.  
N. Beverly Dr./Franklin Canyon  
Oak Forest Canyon Assn.  
Oaks Homeowners Assn.  
Outpost Estates Homeowners  
Rancho Verdugo Estates  
Residents of Beverly Glen  
Roscomare Valley Assn.  
Save Coldwater Canyon!  
Save Sunset Blvd.  
Shadow Hills Property Owners  
Sherman Oaks HO Assn.  
Silver Lake Heritage Trust  
Studio City Residents Assn.  
Sunset Hills Homeowners Assn.  
Tarzana Property Owners Assn.  
Torreyson Flynn Assn.  
Upper Mandeville Canyon  
Upper Nichols Canyon NA  
Whitley Heights Civic Assn.

CHAIRS EMERITI  
Shirley Cohen  
Jerome C. Daniel  
Patricia Bell Hearst  
Alan Kishbaugh  
Gordon Murley  
Steve Twining  
CHAIRS IN MEMORIAM  
Brian Moore  
Polly Ward

Re: **8150 Sunset Blvd. Recirculated DEIR – ENV-2013-2552-EIR**

Dear Ms. Hewawitharana:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 45 homeowner and resident associations spanning the Santa Monica Mountains, from Pacific Palisades to Mt. Washington. The Federation's mission is to protect the property and quality of life of its over 200,000 constituents and to conserve the natural habitat and appearance of the hillside and mountain areas in which they live.

The Federation had previously submitted three letters on this project, dated October 14, 2013, May 8, 2014 and January 19, 2015. We incorporate those letters by reference and expect that the issues raised in those letters will be addressed in the responses to the recirculated Draft EIR.

The Federation voted at its October meeting to continue to oppose the proposed project at 8150 Sunset Blvd. as described in the DEIR, the recirculated DEIR, and the ELDP streamlining process certified for this project. Although we appreciate that the project has been changed in some ways that were responsive to the letters that were submitted through the comment period, there remain major aspects of the project that would create significant negative impacts on commuters, the surrounding community and hillside aesthetics.

Some of our concerns include: the height of the project continues to be out of scale with the surrounding area impacting the hillside aesthetic; the traffic mitigation measures do not appear adequate for a project of this size and scale; this project does not appear to be consistent with the City's General or Community Plans and the findings for consistency have not been made; deviations from code on height, setbacks, etc, cannot be justified; and the marquee structure proposed to display signage is very large with little detail about how it will be utilized. How does the proposed marquee structure and future signage comply with current sign code and how can it be permitted with the sign ban in place. What luminosity limits would be imposed for the outdoor signs for daytime and nighttime hours and what would the impact of the illumination be on the surrounding community, including hillside residents and motorists.



CEQA requires full disclosure of all potential significant environmental impacts to give the community an opportunity for meaningful public input, the decision-makers an in-depth review of projects analyzing a range of alternatives that reduce those impacts, and based on objective analyses found in the EIR, agencies shall mitigate or avoid the significant effects on the environment whenever it is feasible to do so. We do not believe the recirculated DEIR accomplishes these objectives.

We join the Sunset Strip community in their comments and ask that the project be revised to a size and scale consistent with the surrounding community while reducing negative impacts to the neighborhood.

Sincerely,

*Wendy-Sue Rosen*

Wendy-Sue Rosen, Vice President

cc:  
Councilmember Ryu  
Mayor Eric Garcetti

**LETTER B38**

Planning Environmental Review &lt;planning.envreview@lacity.org&gt;

---

**RDEIR for 8150 Sunset**

2 messages

**Grafton Tanquary** <gpt1287@sbcglobal.net>

Mon, Nov 9, 2015 at 10:05 AM

To: Srimal Hewawitharana &lt;srimal.hewawitharana@lacity.org&gt;, planning.envreview@lacity.org

Cc: Christopher Rice <c.rice78@yahoo.com>, Ric Abramson <workplaysstudio@gmail.com>, Marla Miller <marla1008@yahoo.com>, Jerry Ptashkin <ptashkin@aol.com>, Ebon Alabastur <alabastur@aol.com>, Lynn Russell <lenabydesign@mac.com>, Mark Howell <googemanagement@mac.com>, Karen Demille <karendemille@gmail.com>, Rory Barish <n2swimng@aol.com>, Cyd Zeigler <cydzeiglerjr@gmail.com>, Scott Lunceford <slunceford@weho.org>, tony tucci <radiocave@earthlink.net>, Anastasia Mann <anastasia@comiche.com>, Orrin Feldman <ofeldman@pacbell.net>, Adara Salim <adarasalim@gmail.com>, Bob Hofter <bobhofter@gmail.com>, Marian Dodge <president@hillsidefederation.org>, jamie@jamiethall.com

Please see the attached submittal from the Crescent Heights – Havenhurst Neighborhood Protective Association.

---

**Planning Environmental Review** <planning.envreview@lacity.org>

Mon, Nov 9, 2015 at 10:05 AM

To: gpt1287@sbcglobal.net

Thank you for submitting your comments. They have been received and will be included in the administrative record for the Environmental Impact Report (EIR).

*This reply is automatically generated and this mailbox is only actively monitored during an EIR's public comment period. If you have specific questions or would like an immediate response, please contact the project planner identified on the notice directly.*

**LETTER B39**

Planning Environmental Review &lt;planning.envreview@lacity.org&gt;

---

**RDEIR of 8150 Sunset**

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**Grafton Tanquary** <gpt1287@sbcglobal.net>

Mon, Nov 9, 2015 at 11:00 AM

To: Srimal Hewawitharana &lt;srimal.hewawitharana@lacity.org&gt;, planning.envreview@lacity.org

Cc: Christopher Rice &lt;c.rice78@yahoo.com&gt;, Ric Abramson &lt;ric@workplays.com&gt;, Marla Miller &lt;marla1008@yahoo.com&gt;, Jerry Ptashkin &lt;ptashkin@aol.com&gt;, Ebon Alabastur &lt;alabastur@aol.com&gt;, Lynn Russell &lt;lenabydesign@mac.com&gt;, Rory Barish &lt;n2swimng@aol.com&gt;, Cyd Zeigler &lt;cydzeiglerjr@gmail.com&gt;, Scott Lunceford &lt;slunceford@weho.org&gt;, Anastasia Mann &lt;anastasia@corniche.com&gt;, Orrin Feldman &lt;ofeldman@pacbell.net&gt;, Adara Salim &lt;adarasalim@gmail.com&gt;, Marian Dodge &lt;president@hillsidefederation.org&gt;, jamie@jamiethall.com, Karen Demille &lt;karendemille@gmail.com&gt;

Please see the attached.

**8150 gpt chnpa letter re rdei rnov 2015.docx**

17K

# Crescent Heights – Havenhurst Neighborhood Protective Association

November 7, 2015

Srimal Hewawitharana  
City of Los Angeles  
Environmental Analysis Section  
Department of City Planning  
planning.envreview@lacity.org

Subject: Response to the RDEIR for 8150 Sunset Boulevard, City Case ENV-2013-2552-RDEIR

Please ask the developer to address and answer these questions:

## **Transit**

The project developer has asked for an increase in the FAR to 3:1 based on meeting the criteria of subdivision 25(f)(4) of Subsection A of Section 12.2 of the Los Angeles Municipal Code.

In calculating the distance between the property and the nearest Transit Stop, the EIR consultant has measured the distance between the center of the project and the corner of Fairfax and Sunset Boulevards.

Does the corner of Sunset and Fairfax meet the definition of a Transit Stop in this section of the Code?

What is the nearest intersection which does meet the definition of a Transit Stop?

What is the distance a) in a direct line (as the crow flies) and b) by sidewalk (as a pedestrian would reach the Stop) to the intersection of Fairfax and Santa Monica Boulevards?

Provide a map indicating the length of the several segments required to reach this destination.

## **Housing Density Bonus**

The state requires that for a density bonus in excess of that permitted in Section 12.22.A.25 there will be “(4) No buildings are higher than any main building on adjoining property.

Does the project meet this criterion?

The applicant is apparently using affordable housing density bonuses to increase commercial space. Are not affordable housing bonuses intended to increase the density of the residential component only?

How can the applicant justify this mis-appropriation of the state affordable housing bonuses?

## **Parking**

The developer has proposed to install, on average, one parking space for each of the residential condominiums.

Does the developer plan to limit sales to single individuals? If not, where will the additional people park their cars?

How does the proposed ratio of compact parking space to standard spaces compare to the same ratio of cars on the road?

What provision will be made for SUVs and other larger cars?

## **Zoning**

The subject property is currently zoned for “neighborhood commercial”. Does the proposed development meet this standard?

## **Community Plan**

Does this project conform to the Hollywood Community Plan? Please include a summary of the general land use parameters envisioned by the Hollywood Community Plan and indicate how this project conforms to those parameters.

The subject property was downsized three times as part of the General Plan, with the previous FAR reduced to its present density.

How does the applicant justify increasing the FAR again?

---

Grafton P. Tanquary, President  
1287 N. Crescent Heights Blvd.  
West Hollywood, CA 90046-5022  
323.656.8779  
[gpt1287@sbcglobal.net](mailto:gpt1287@sbcglobal.net)

Submittal by email

**LETTER B40**

William Lamborn &lt;william.lamborn@lacity.org&gt;

---

**Fwd: RDEIR for 8150 Sunset**

1 message

**Srimal Hewawitharana** <srimal.hewawitharana@lacity.org>

Tue, Nov 10, 2015 at 10:09 AM

To: William Lamborn &lt;william.lamborn@lacity.org&gt;

----- Forwarded message -----

From: **Grafton Tanquary** <gpt1287@sbcglobal.net>

Date: Mon, Nov 9, 2015 at 1:11 PM

Subject: RDEIR for 8150 Sunset

To: Srimal Hewawitharana &lt;srimal.hewawitharana@lacity.org&gt;

Please see attached re: 8150 Sunset

—  
Srimal P. Hewawitharana  
Environmental Specialist II  
Los Angeles City Planning Department  
EIR Analysis Section, Mail Stop 395  
200 North Spring Street, Suite 750  
Los Angeles, CA 90012  
(213) 978-1359

**8150 gpt chnpa letter re rdei rnov 2015.docx**

16K

# Crescent Heights – Havenhurst Neighborhood Protective Association

November 7, 2015

Srimal Hewawitharana  
City of Los Angeles  
Environmental Analysis Section  
Department of City Planning  
planning.envreview@lacity.org

Subject: Response to the RDEIR for 8150 Sunset Boulevard, City Case ENV-2013-2552-RDEIR

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Does the corner of Sunset and Fairfax meet the definition of a Transit Stop in this section of the Code?

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Provide a map indicating the length of the several segments required to reach this destination.



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How does the applicant justify increasing the FAR again?

---

Grafton P. Tanquary, President  
1287 N. Crescent Heights Blvd.  
West Hollywood, CA 90046-5022  
323.656.8779  
[gpt1287@sbcglobal.net](mailto:gpt1287@sbcglobal.net)

Submittal by email

**LETTER B41**

William Lamborn &lt;william.lamborn@lacity.org&gt;

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**Fwd: RDEIR of 8150 Sunset**

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**Srimal Hewawitharana** <srimal.hewawitharana@lacity.org>  
To: William Lamborn <william.lamborn@lacity.org>

Tue, Nov 10, 2015 at 10:16 AM

----- Forwarded message -----

From: **Grafton Tanquary** <gpt1287@sbcglobal.net>

Date: Mon, Nov 9, 2015 at 11:00 AM

Subject: RDEIR of 8150 Sunset

To: Srimal Hewawitharana <srimal.hewawitharana@lacity.org>, [planning.envreview@lacity.org](mailto:planning.envreview@lacity.org)

Cc: Christopher Rice <[c.rice78@yahoo.com](mailto:c.rice78@yahoo.com)>, Ric Abramson <[ric@workplays.com](mailto:ric@workplays.com)>, Marla Miller <[marla1008@yahoo.com](mailto:marla1008@yahoo.com)>, Jerry Ptashkin <[ptashkin@aol.com](mailto:ptashkin@aol.com)>, Ebon Alabastur <[alabastur@aol.com](mailto:alabastur@aol.com)>, Lynn Russell <[lenabydesign@mac.com](mailto:lenabydesign@mac.com)>, Rory Barish <[n2swimng@aol.com](mailto:n2swimng@aol.com)>, Cyd Zeigler <[cydzeiglerjr@gmail.com](mailto:cydzeiglerjr@gmail.com)>, Scott Lunceford <[slunceford@weho.org](mailto:slunceford@weho.org)>, Anastasia Mann <[anastasia@comiche.com](mailto:anastasia@comiche.com)>, Orrin Feldman <[ofeldman@pacbell.net](mailto:ofeldman@pacbell.net)>, Adara Salim <[adarasalim@gmail.com](mailto:adarasalim@gmail.com)>, Marian Dodge <[president@hillsidefederation.org](mailto:president@hillsidefederation.org)>, [jamie@jamiethall.com](mailto:jamie@jamiethall.com), Karen Demille <[karendemille@gmail.com](mailto:karendemille@gmail.com)>

Please see the attached.

—  
Srimal P. Hewawitharana  
Environmental Specialist II  
Los Angeles City Planning Department  
EIR Analysis Section, Mail Stop 395  
200 North Spring Street, Suite 750  
Los Angeles, CA 90012  
(213) 978-1359



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**8150 gpt chnpa letter re rdei rnov 2015.docx**

17K

# Crescent Heights – Havenhurst Neighborhood Protective Association

November 7, 2015

Srimal Hewawitharana  
City of Los Angeles  
Environmental Analysis Section  
Department of City Planning  
planning.envreview@lacity.org

Subject: Response to the RDEIR for 8150 Sunset Boulevard, City Case ENV-2013-2552-RDEIR

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How does the applicant justify increasing the FAR again?

---

Grafton P. Tanquary, President  
1287 N. Crescent Heights Blvd.  
West Hollywood, CA 90046-5022  
323.656.8779  
[gpt1287@sbcglobal.net](mailto:gpt1287@sbcglobal.net)

Submittal by email

**LETTER B42**

William Lamborn &lt;william.lamborn@lacity.org&gt;

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**Fwd: Comments regarding the Sunset Blvd. Mixed Use Project DEIR - City Case No. ENV-2013-2552-EIR**

1 message

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**Srimal Hewawitharana** <srimal.hewawitharana@lacity.org>

Tue, Nov 10, 2015 at 10:15 AM

To: William Lamborn &lt;william.lamborn@lacity.org&gt;

----- Forwarded message -----

From: **Geary & Michelle Coats** <coatsconsulting@gmail.com>

Date: Mon, Nov 9, 2015 at 5:14 PM

Subject: Comments regarding the Sunset Blvd. Mixed Use Project DEIR - City Case No. ENV-2013-2552-EIR

To: [srimal.hewawitharana@lacity.org](mailto:srimal.hewawitharana@lacity.org)

M.s. Hewawitharana;

This letter was mailed to you, but to insure you receive this in a timely manner, I have included a copy below.

Respectfully;

Michelle D. Coats  
Coats Consulting

**\*COATS CONSULTING\***P [831.250.7192](tel:831.250.7192) | F [831.250.7193](tel:831.250.7193)

PO Box 1356 Carmel, CA 93921

♻️ \*Please consider the environment before printing any part of this email\*\*.

\*\*\*

—

Srimal P. Hewawitharana  
Environmental Specialist II

Los Angeles City Planning Department  
EIR Analysis Section, Mail Stop 395  
200 North Spring Street, Suite 750  
Los Angeles, CA 90012  
[\(213\) 978-1359](tel:(213)978-1359)



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**Revised Ltr. Recirculated Draft EIR. November 6, 2015.doc**

52K



P 831.250.7192  
F 831.250.7193  
PO Box 1356  
CARMEL, CA. 93921

[COATSCONSULTING@GMAIL.COM](mailto:COATSCONSULTING@GMAIL.COM)

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LAND PLANNING • ENVIRONMENTAL PLANNING • ENTITLEMENT/PROJECT MANAGEMENT • BRANDING

---

November 6, 2015

Mayor Garcetti  
Council Member Tom LeBonge  
Jonathan Brand  
Srimal Hewawitharana  
Environmental Analysis Section  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, California 90012

Subject: Comments regarding the Sunset Blvd. Mixed Use Project DEIR - [City Case No. ENV-2013-2552-EIR](#)

At the request of "Save Sunset Blvd", Coats Consulting has been requested to review the Draft EIR for the Sunset Blvd Mixed Use Project, to ensure that it is adequate and complete, in order for the City of Los Angeles to be able to certify the environmental document in question. As you are aware the purpose of a CEQA document is first and foremost to "INFORM". CEQA documents are intended to be informational, unbiased and represent a complete and thorough evaluation of all relevant information needed for the Lead Agency to make an informed decision.

Unfortunately the Sunset Blvd Mixed Use Draft EIR, as prepared, is still incomplete and has not adequately evaluated the potential environmental impacts nor has it addressed the 'land use' inconsistencies associated with the proposed project. In its current format, the document, once again, has been prepared, as an "Advocacy" document, intended to provide an environmental document that can be used to justify a project, not adequately evaluate the proposed project and its impacts on the Hollywood community, which will be most directly affected by the impacts of this proposed development.

Our evaluation focused on the General Plan / Community plan consistency, the potential visual impacts, the cumulative evaluations and the Community Open Space/common areas adequate to provide public outdoor recreational opportunities for existing and future residents and visitors.

#### HOLLYWOOD COMMUNITY PLAN:

In every community, compliance with Community plans (General Plan) is viewed as a safety net for the residents to ensure that present and future city administrations and decision makers have a consistent basis under which to conduct compliance assessments on proposed projects. In the case of the, Sunset Blvd Mixed Use Project, instead of testing the potential impacts against Goals and Objectives



established in a viable and up to date Community Plan, and community design programs, the proponent and EIR consultant are using "incentive" Programs to circumvent the need to provide an environmentally superior project. Project approval, at the expense of policy compliance and appropriate community planning practices, appears to be the driving force employed by this approach to the evaluation.

The Hollywood Community Plan was prepared for adoption in 1988, some twenty-seven (27) years ago. Good and adequate planning practices, not to mention State Laws and Guidelines, insist on a General Plan review every five (5) years and an updated document, at least every twenty (20) years. Since the last attempt at updating this Plan was over-turned by the Courts in 2014 due to lack of compliance, the absence of an updated Community Plan leaves the Hollywood community without the proper tools to evaluate the "real" impacts of this Project on the community at large. In the least, this Project is premature and should be postponed for review until after a legally viable Community Plan is adopted. Reinstating the 1988 Plan and placing a 2014 date on it is not adequate; as it does not address the current conditions and needs of the community and provide viable, up to date planning guidelines for development. This has put the community in the position of having no Master Planning tool for the Sunset Blvd area, the heart of Hollywood. Instead, Incentive Programs, and Over Riding consideration findings are being used to over ride an appropriate process of review and analysis.

Furthermore, it is shortsighted of the City to review and possibly approve this Project as proposed. This approach to Planning sets a dangerous precedent for the City of Los Angeles, in that there are numerous parcels located along Sunset and within the immediate area of this proposed project, that have similar zoning and general plan land use designations. These same properties could make the same request for 'incentives' and 'considerations'. The development of multiple, 'massive' towering developments along Sunset Blvd.; fronting on medium to low density residential neighborhoods, would forever change the scale and character of Sunset Blvd and the Hollywood community. Denying subsequent requests, based on any of the 'planning' practices that are being ignored in this case, would indicate preferential treatment of the applicant's project and selective enforcement of the City's General Plan and Zoning. Sadly, Non of these issues have been addressed in this "re-issued" Draft EIR.

I would ask City Staff, the Mayor and the Councilmembers to consider this Project as inadequate, as currently designed, until a Hollywood Community Plan has been updated, found to be legally sound, and finally approved. At that point, the City will have the tools to evaluate and approve a project that will truly meet the community needs and address any community concerns, both now and in the future.

Land use represents the heart of an environmentally superior project. This project, as proposed does not address any of the land use issues. If no responses are made to the land use inconsistencies, then what are the General Plan policies for ? I see no evidence that any of our Land Use concerns have been addressed in this currently revised Draft Environmental Impact Report.

In closing, this document was originally prepared for a project for which the City Staff utilized a process of incentive programs and over riding considerations as justification for the development. This process does not meet the intent of those programs or processes, nor does it meet the intent of the General Plan as adopted by the City Council or the law. Please reconsider the adequacy of this document, once again, and require a revision which will address ALL of the comments previously made as well as the comments submitted forth with, and recirculate an further revised document which will address the inadequacies.

Respectfully Submitted;

*Michelle D. Coats*

Michelle D. Coats

## LETTER B43



November 6, 2015

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

RECEIVED  
CITY OF LOS ANGELES

NOV 16 2015

ENVIRONMENTAL  
UNIT

RE: Recirculated Draft Environmental Impact Report, 8150 Sunset Blvd.  
Case #: ENV-2013-2552-EIR

Dear Ms. Hewawitharana:

This letter was adopted unanimously (16 yes, 0 no) by a vote of the Hollywood Hills West Neighborhood Council at a publicly held meeting on Nov. 4, 2015. The proposed project at 8150 Sunset Blvd. falls within the HHWNC boundaries.

The stakeholders of the Hollywood Hills West Neighborhood Council have voiced many concerns, compliments and comments about the large-scale development proposed at 8150 Sunset Blvd. Various changes as reflected in Alternative 9, including reduction of commercial space and change in architectural design, are appreciated by some in the neighborhood. We are happy to see the developer working with us.

However, we would like to draw the attention of the Planning Dept. and the developer to a number of critical issues that have been voiced and continue to be paramount to the neighborhood.

- 1) The purpose of the Alternatives section of an EIR is to assess alternatives that may reduce environmental impacts. Alternative 9 exacerbates them, but a similar design scheme from the new architect at a lower height and massing could accomplish the goal of reduced impact.
- 2) The height of the project continues to be the paramount concern to the neighborhood. The height as currently proposed is out of scale with the neighborhood and interferes with the iconic views to and from the hills and of Los Angeles' blue sky. While the neighborhood has expressed these concerns from the first meetings with the developer, Alternative 9 is even higher than the original proposal and not in harmony with the existing built environment and surrounding neighborhood. We would like to know what shorter alternatives have been discussed with the new architect, and what shorter designs they have created. The maximum height as proposed in Alternative 9 is not supported by this neighborhood council.
- 3) In less general terms, our concern with the height of the project relates to two environmental impact categories: view impacts and shading. The DEIR incorrectly concludes in Impact Statement AES-2 that "the Project would not obstruct focal or panoramic views across the Project Site." We disagree! For the thousands of drivers per day who cross over the Hollywood Hills via Laurel Canyon, when they reach the bottom of the canyon at Sunset Boulevard, they have an "Aha moment" as they gaze out over the cityscape of the City of Los Angeles. The proposed project will completely obliterate this panoramic view. This results in a significant impact.
- 4) The Shading impact analysis is flawed from the get-go in that it incorrectly characterizes the general pattern of development in the project vicinity. It notes that "taller buildings in the vicinity of the Sunset Strip including the 31-story Sierra Towers at Doheny Road and Sierra Alta Road, the 15-story Mondrian Hotel at Sunset Boulevard and Olive Drive, and the 12-story Andaz Hotel at



Sunset Boulevard and Kings Road, generate some shading at the north and south sides of Sunset Boulevard.” These referenced tall buildings are not in the project vicinity and are not even in the City of Los Angeles. The fact that the City of West Hollywood has embraced height and sacrificed sun light on the Sunset Strip should not justify the same treatment in Los Angeles. Further, the shadow analysis depicted in Figure 4.A-13 clearly illustrates that the public open space along the sidewalk on the north side of the project (south side of Sunset Boulevard) will be shaded from 11:00 am until after 3:00 pm, exceeding the three-hour shading threshold for a significant impact. The public open space portions of the Project will also be shaded for virtually the entire day resulting in a shade impacted area within the project site.

5) The traffic study incorporated in the recirculated DEIR is problematic. Assumptions in the study are from 2013 and not current including cumulative projects and current traffic. In addition, the traffic flow of the project has changed with Alternative 9 and raises larger safety concerns about issues like the intention for left-hand turns out of the project onto Crescent Heights. In addition, we are concerned about the bottleneck that could be created with the left-hand turns from northbound Crescent Heights into the project. This exchange of vehicles has not been adequately studied and reported. We direct the city's and applicant's attention to the comments submitted below and request a new traffic study be undertaken by a new independent firm.

6) Maintaining part of the current traffic island and a south-bound right-hand-turn lane from eastbound Sunset Blvd. will continue to offer traffic relief from the poorly graded intersection at Crescent Heights. We would like to see the new traffic study re-incorporate that turn lane. If part or all of the existing traffic island, currently city property, is given or sold to the property owners, we do not believe this square footage should be incorporated into the FAR calculations for the project.

7) We don't understand how the project will meet the 9,000 gpm fire flow required for a project of this size. Given that the Sunset water main that serves the project is old and fragile, and has already experienced one major rupture, have LAFD and LADWP provided assurances that the main's integrity is sufficient to guarantee adequate flow in the event of a major fire at the site? Will they give some kind of exemption to the required gpm? Plus, the project site sits directly across from a hillside area known as the Kirkwood Bowl, Mt. Olympus and Laurel Canyon (Hollywood), one of the highest-fire-danger areas in the city. Assurance of continued water flow and supply is of paramount importance, not only to the project, but to the adjacent hillsides and surrounding area. Being directly adjacent to a Very High Fire Hazard Severity Zone (VHFHS Zone) water and emergency response time are critical. We would like to further understand the plans to maintain necessary water flow in an emergency.

8) According to the developer, the materials to be used in the external elements of Gehry's design have not yet been finalized. Given that there was a significant issue with glare when Gehry designed the Disney Concert Hall, which was not addressed prior to completion, we would like assurances that the exterior material will not create a glare impact.

9) Regarding construction, we want to make sure all sidewalks will remain accessible to the public during the entire construction period. What are the developers' plans to ensure the safe use of all sidewalks for pedestrians and bike riders along Sunset, Havenhurst and Crescent Heights during construction?

10) The project takes advantage of increased density via SB 1818 due to its proximity to a transit stop at Fairfax Ave. and Sunset Blvd. We would like to know 1) how that transit stop meets the requirements of a transit stop for SB 1818, and 2) whether there is a sufficient transit stop within the required 1,500 feet to qualify for SB 1818. If that stop does not meet the requirements, we



would like to better understand the developer's plans to improve the existing transit at Fairfax Ave. and Sunset Blvd., including increased sidewalk depth. We do not believe the current facilities are adequate to accommodate what will be increased demand.

11) While the project aims to increase density and foot traffic in the area, we do not believe the currently proposed sidewalk depth reflects the need for "walkable streets." We would like to see revisions to the project that further widen the sidewalks and set the buildings back from the property line.

12) For all future developments, especially for large mixed-use projects, true environmental leadership is paramount to a building's sustainability and resiliency, particularly in an area of delicate topography. We see many opportunities to include new technologies, such as state-of-the-art solar capabilities and recaptured water source to utilize Los Angeles's natural resources and reduce reliance on strained energy grid. We would like to see the developer explore these options and incorporate them into the project.

13) We ask the developer to address the weight limit allowed on Havenhurst by the City of Los Angeles and West Hollywood and the weights of the various delivery trucks servicing retailers at 8150 W. Sunset Boulevard to insure the trucks are in compliance.

14) Public safety is of the utmost importance. We request the developer provide assurances that the Los Angeles Police (LAPD) and Los Angeles Fire Departments (LAFD) have adequate access to all areas on the property at street level and inform the public of approvals by Police and Fire that said access for either department is acceptable.

15) We feel that the demolition of the Lytton Bank building would present a significant unmitigable impact due to the loss of a cultural and historic resource and could not be overridden by a statement of overriding consideration. We request preservation of the building.

16) The DEIR does not properly address the cumulative effects of the project. CEQA requires that the cumulative effects be specifically addressed in part of the EIR process. A separate section on cumulative effects needs to be prepared in order to comply with CEQA.

#### **Traffic-specific comments on 8150 DEIR and Recirculated DEIR**

17) The traffic analysis assumes that the free-flow, right-turn lane on eastbound Sunset Boulevard at Crescent Heights will be removed (see Figure 8, page 50 of Appendix H – Traffic and Parking) and replaced with a short, right-turn lane. This would result in overflow from the right-turn lane, blocking the third through lane on Sunset. All level of service calculations based on this lane configuration are inaccurate and should be corrected. All renderings of the project which incorporate the city right of way for the right-turn lane and the adjacent island into the project and make it appear to contain more open space than it can on its own property are inaccurate and should be corrected to present a fair picture of the project.

18) The project site is served by Metro transit routes 218 and 2/302. The 218 runs north-south on Crescent Heights and Laurel Canyon and provides limited service at 30 minute headways during most of the day. Line 2 and 302 serve the Sunset Boulevard corridor with 10-15 minute service in the local Route 2 and 10-40 minute service on limited stop Route 302. This level of transit service would not be consistent with categorization of the project site as appropriate for transit oriented development. Only if a higher level of transit service were guaranteed into perpetuity could such a designation be appropriate. Any one of these bus lines could be terminated by Metro at any





time. The DEIR characterization of Metro lines 217 and 780 on Fairfax Avenue as serving the project site is inaccurate.

19) The Existing Conditions traffic counts from 2013 are outdated and were representative of depressed economic conditions during the Great Recession. They are not representative of existing conditions in 2015 and should have been updated for the Recirculated DEIR.

20) The cumulative projects list is also outdated and should have been updated for the Recirculated DEIR. Figure 12, page 72 of Appendix H – Traffic and Parking does not show one single project on Sunset Boulevard between Crescent Heights and La Brea Avenues, and there are many such proposed projects. It also does not include the Horizon Hollywood (Mosaic) project.

21) The list of 15 intersections included in the traffic analysis does not include the intersection of Sunset Boulevard at Laurel Avenue, the intersection immediately to the east of the project and an intersection that frequently backs up into the Sunset/Crescent Heights intersection. This renders the traffic analysis inadequate and the level of service analysis at the Sunset/Crescent Heights intersection suspect as the DEIR authors clearly did not understand the interrelationship of traffic queues between these two intersections.

22) The conclusions of the traffic analysis are presented on pages 96-100 of Appendix H – Traffic and Parking as follows:

“As also shown in Tables 9(a) and 9(b), most of these incremental project-related changes in either the CMA or vehicular delay values are relatively nominal, and in fact, during the AM peak hour, slight improvements in the operations of several of the locations could occur, as a result of the anticipated reductions in site-related traffic due to development of the proposed project. However, as also shown in Table 9(b), vehicular delays at the unsignalized intersection of Fountain Avenue and Havenhurst Drive could increase by nearly 50 seconds per vehicle during the PM peak hour as a result of the addition of project-related trips. However, despite this rather substantial increase in vehicular delay at this particular (unsignalized) intersection, both Table 9(a) and Table 9(b) show that the net new incremental traffic generated by the proposed project would not be expected to produce changes to the current operating conditions (LOS) at any of the 15 study intersections (including Fountain Avenue and Havenhurst Drive) during either the AM or PM peak hour analysis periods.”

These conclusions are unbelievable for a variety of reasons:

A. The level of service calculations presented in both Tables 9(a) and 9(b) note that intersection existing and future level of service was manually adjusted to LOS E or F based on observations of existing conditions. What this is indicating is that the software used to assess the LOS conditions in the project area was unable to accurately calculate the level of service due to the over-saturated conditions (i.e., gridlock) currently experienced at 8 out of the 15 intersections in the study area. The fact that the traffic analysis software was unable to accurately calculate level of service at LOS E and F intersections (more than half of those included in the analysis) calls into question the accuracy of the impact analysis itself at all of these locations.

B. The traffic analysis refers to the “net new incremental traffic” generated by the proposed project based on the inappropriate assertion that trips associated with all of the existing on-site uses will disappear from the area. This is a false assumption. Residents of the area who now visit the site to do banking or visit their dentist, or even to buy a cup of coffee or a hamburger, will not eliminate those trips in the future. On the contrary, they will continue to drive on area streets to make those same errands, just to other local commercial areas where those businesses relocate. The entire traffic analysis is called into question by the assumption that all of these trips will be eliminated from the project area roadways and that the project takes credit for eliminating them.



This calls into question the cumulative impact of the project as well as the project-specific impact analysis, as cumulative trips that will remain have been wished away.

C. The 50 second "rather substantial increase in vehicular delay" at Fountain and Havenhurst should not be dismissed as insignificant. It will be felt as a significant inconvenience to all drivers who have to use that intersection.

23) The traffic analysis does not propose any mitigation measures other than required TDM to reduce the impacts of the project due to the faulty traffic analysis which concluded there would be no impacts. This is unacceptable.

24) The analysis of Havenhurst Avenue is flawed in two ways. First, it assumes that all traffic related to existing land uses on the site will disappear, which as noted above will not be the case. People will still need to drive to their bank or dentist office. It also assumes that all of the traffic exiting the driveway on Havenhurst will turn right out of the driveway and head north to congested Sunset Boulevard. Tell that to the folks on Laurel Avenue south of the 8000 Sunset commercial complex. It is unreasonable to assume that everyone will obey a "right-turn-only" sign and doing so results in a traffic analysis that inaccurately portrays the impact on Havenhurst south of the project. This is particularly true if the project installs a traffic signal at Havenhurst and Fountain as a "project mitigation measure." It will attract traffic Havenhurst as have the traffic signals on Laurel Avenue, which used to be a quiet residential street.

25) Table 2(b) in Appendix H- Traffic and Parking lists theoretical trip generation rates by land use type supposedly representative of the existing land uses on the site. It presents a theoretical calculation of the amount of traffic generated by the existing site. It would have been more accurate for the DEIR authors to collect empirical trip generation data by counting traffic movements in and out of the existing driveways. They similarly could have counted the distribution of traffic by driveway. Instead Figure 5(b) presents an assumed distribution of existing traffic by driveway, suggesting that only 10% of existing traffic uses the Havenhurst driveway. Where is the empirical data to substantiate that assumption? Based on a theoretical calculation using national average trip generation rates, often based on suburban retail centers, the DEIR calculates in Tables 2 (a), (b) and (c) that the existing site generates 5,296 trips per day and that the proposed project will generate 6,373 for a net increase of 1,077 trips per day. What if empirical data showed that this more-urban shopping center generates only 4,000 trips per day. The net increase in trips attributable to the project would be 2,373. Without empirical trip generation data for the existing site, something that would have been easy to collect with driveway counts, the traffic analysis is called into question for potentially inflated the site's existing trips and thereby reducing the projected net trip generation.

Regards,

Anastasia Mann  
President

Hollywood Hills West Neighborhood Council

Cc: Srimal Hewawitharana, Dept. of City Planning, [srimal.hewawitharana@lacity.org](mailto:srimal.hewawitharana@lacity.org)  
David Ryu, City Council District 4, [david.ryu@lacity.org](mailto:david.ryu@lacity.org)  
Renee Weitzer, City Council District 4, [renee.weitzer@lacity.org](mailto:renee.weitzer@lacity.org)  
Cyd Zeigler, HHWNC PLUM Chair, [plumchair@hhwnc.org](mailto:plumchair@hhwnc.org)  
Barbara Witkin, HHWNC Area 7 Chair, [area7chair@hhwnc.org](mailto:area7chair@hhwnc.org)  
Gabe Kramer, Marathon Communications, [gkramer@marathon-com.com](mailto:gkramer@marathon-com.com)