



## Environmental Review Section

City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



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# *FINAL ENVIRONMENTAL IMPACT REPORT*

## *WILSHIRE COMMUNITY PLAN AREA*

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# *Wilshire Crescent Heights*

*Case No. ENV-2008-0729-EIR*

*SCH No. 2008051017*

*Council District No. 5*

**Project Address:** 652 – 685 ½ S. Crescent Heights Boulevard and 6233 – 6245 W. Wilshire Boulevard, Los Angeles, CA

**Project Description:** The project site is currently developed with a single story, 7,117 square-foot bank, and associated surface parking lot. The Applicant proposes the development of a new 21-story mixed-use commercial and residential tower on the northeast corner of Wilshire Boulevard and Crescent Heights Boulevard, which would total approximately 175,057 square feet of floor area and contain 158 residential units, and 6,850 square feet of ground level retail. The residential component of this project would be located in a 16-story residential tower. The proposed structure will reach a maximum height of 255 feet. The proposed project would also include the construction of four at grade town homes totaling approximately 11,106 square feet. The town homes, and associated 10 parking spaces, would be located on the northwestern corner of the project site and would rise to a height of approximately 45 feet. A total of 422 parking spaces will be provided in two-and-a-half subterranean parking garage levels and four above grade parking garage levels. With the 422 parking spaces in the garage and the 10 parking spaces for the townhomes, the total number of spaces provided would be 432.

**APPLICANT:**

Crescent Heights Wilshire, LLC

**PREPARED BY:**

Christopher A. Joseph & Associates

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*March 2010*

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## I. INTRODUCTION

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### A. INTRODUCTION

In accordance with Sections 15088, 15089, and 15132 of the California Environmental Quality Act (CEQA) Guidelines, the Los Angeles Department of City Planning has prepared this Final Environmental Impact Report (Final EIR) for the Wilshire Crescent Heights Project. The City of Los Angeles is the lead agency for this project. The project applicant is Wilshire Crescent Heights LLC, 5847 San Felipe, Suite 3600, Houston, TX 77057.

#### **Organization of Final EIR**

This Final EIR is organized into four sections, as follows:

Section I. Introduction: This section provides an introduction to the Final EIR, a summary of the proposed project description, discretionary actions, alternatives to the proposed project, and environmental impacts and mitigation measures from the Draft EIR.

Section II. Comments and Responses: This section includes all comments received on the Draft EIR during the public review period, as well as a response to each comment.

Section III. Corrections and Additions to the Draft EIR: This section provides additions and corrections to update the Draft EIR, based on comments received during and after the public review period.

Section IV. Mitigation Monitoring and Reporting Program: This section is designed to monitor implementation of all feasible mitigation measures as identified in the Draft and Final EIRs for the proposed project. Mitigation measures are indicated below and are numbered consistent with the relevant section numbering provided in the Draft EIR.

### B. LOCATION

The project site is a 1.03-acre parcel (45,155 square feet), located in the Wilshire Community of the City of Los Angeles at 6245 Wilshire Boulevard. The project site is located within the Wilshire Community Plan. Approximately 38,902 square feet of the project site (lots 15-18) are designated for “Regional Center” use in the Wilshire Community Plan and are zoned [Q]C4-2D-O. The remaining approximately 6,253 square feet (Lot 19) are zoned [Q]R-3-1-O (Limited Multiple Residence).

The site is bounded to the south by Wilshire Boulevard, to the west by Crescent Heights Boulevard, to the north by Orange Street and two multifamily residences, and to the east by an office building. The City of Beverly Hills and the Miracle Mile are equidistant from the project site.

Regional access to the project site is provided by the Santa Monica Freeway (US-10) and the Hollywood Freeway (US-101). Major north-south streets serving the area containing the project site include Fairfax

Avenue and La Cienega Boulevard. Primary east-west access to the project area is provided by Wilshire Boulevard, 3rd Street and Olympic Boulevard.

## **C. SUMMARY OF THE PROPOSED PROJECT**

### **Project Concept and Parameters**

#### *Existing Uses*

The proposed project consists of the removal/demolition of all existing uses on the project site and the construction and operation of a mixed-use development containing residential and commercial uses and associated parking facilities on the project site. The project site presently contains a 7,117 square foot Wells Fargo Bank and associated surface parking lot.

#### *Proposed Project Characteristics*

The proposed project includes the demolition of the existing bank and construction of an approximately 175,057 square foot, 21-story, mixed use structure, which would include 168,207 square feet of residential uses and 6,850 square feet of ground floor retail. The proposed structure would rise approximately 255 feet at its highest point. The proposed project would also include the construction of four at grade town homes totaling approximately 11,106 square feet. The town homes would be located on the northwestern corner of the project site and would rise to a height of approximately 45 feet. As previously stated, the portion of the project site that would contain the 21-story mixed use building is zoned as [Q]C4-2D-O.

The proposed mixed-use structure would be rectangular in shape and would be sited with the tallest portions of the building towards the center of the building pad. Two and one-half subterranean parking garage levels would be located underneath the proposed structure and would provide parking for both residential and commercial uses, as well as housing mechanical equipment and other service equipment. The first floor would contain 6,850 square feet of retail space along Wilshire Boulevard, a residential lobby along Crescent Heights Boulevard, and parking for commercial uses. Residential pedestrian access will be provided via a residential lobby located on Crescent Heights Boulevard. The retail space would be located along Wilshire Boulevard to create a commercially-oriented street level presence. Vehicular access for retail customers will be located along Wilshire Boulevard. For residential tenants vehicular access will be located along both Wilshire Boulevard and Crescent Heights Boulevard. Levels two through four would consist of the podium style parking garage which, in combination with the parking on the ground floor and subterranean levels, would provide a total of 422 parking spaces. Level five would provide various indoor and outdoor residential amenities. Amenities would include outdoor recreational features such as a pool, a fire pit and a BBQ area. Indoor residential amenities would include a fitness center, a lounge complete with bar and kitchen, and a screening room. Two residential units would also be provided on level five. Levels six through 20 would consist of the residential tower providing a total of 158 residential units including the two units on level five. The 158 residential units would be comprised

of a mixture of one-bedroom units, one-bedroom plus a den units, two-bedroom units, and two-bedroom plus a den units. Level 21 would include a sky lounge and a rooftop garden. The total open space provided in the structure is approximately 17,425 square feet, 12,075 square feet of which is common open space available to all tenants. The remaining 5,350 square feet of open space is provided as private balconies. These balconies range in size from 100 square feet to 175 square feet, depending on residential unit size. Located on the upper rooftop would be an emergency helistop, solar panels, and various mechanical equipment

Four town homes would be located on the northwestern portion of the project site and would range between 1,700 to 1,900 square feet in size. They would be three stories, comprised of ground level parking with two residential levels above, rising to a height of 45 feet. The four townhomes would provide 10 parking spaces (eight for residents and two for guests). Therefore, there would be a total of 432 parking spaces provided (422 + 10). Access for pedestrians would be provided along Orange Street and vehicular traffic would be provided along Crescent Heights Boulevard.

### *Design Concept*

The proposed project would be approximately 255 feet tall featuring a modern, stepped design to minimize the massing of the structure. The building, as designed, is modern in style and is intended to lend a complementary, yet distinct, commercial character which will be integrated into the Wilshire Boulevard street frontage, as well as the overall project design. The proposed project would include a proposed canopy on both street elevations along Wilshire Boulevard. A pedestrian entry plaza is proposed at the corner of Wilshire Boulevard and Crescent Heights as the main pedestrian entrance to the residential tower. This entry would include an art feature. A motor court is proposed with access from Crescent Heights (Figure II-7) on the ground floor. The upper levels of the parking garage would be accessible from the proposed motor court. The subterranean parking would be accessible from Wilshire Boulevard (Figure II-2). Existing street trees along Crescent Heights and Wilshire Boulevard will be replaced with new trees pursuant to City standards.

### *LEED Certification*

The proposed project would be constructed to maximize building efficiency with LEED characteristics. The following statements broadly describe several aspects of the proposed project which can contribute to a LEED certification from the U.S. Green Building Council:

- There are several bus routes in the study area that provide either direct access to the project site, or provide stops within convenient walking distance (i.e., one-quarter mile).
- A stormwater pollution prevention plan will be implemented during construction.
- The building will provide secure bicycle storage for occupants and visitors.

- Preferred parking incentives for low-emitting and fuel efficient vehicles will be offered.
- Stormwater management and filtration systems will help minimize downstream pollution from roof and site water runoff.
- Landscaping will be designed to minimize or eliminate potable water usage.
- Low-flow plumbing fixtures will be specified throughout the building to reduce water waste.
- The building's energy consuming systems (lighting, air conditioning, etc) and envelope (windows, roof, and walls) will be designed with the aid of energy modeling software to establish a minimum 14 percent increased energy efficiency compared to a Title 24 Energy Code compliant building.
- The building's mechanical systems will be analyzed by a third party commissioning agent during installation and start-up to confirm they will function as originally designed.
- Building occupants will have access to recycling services.
- The demolition and construction processes will be managed to ensure at least 75 percent of debris is recycled rather than sent to a landfill.
- Building materials and interior finishes with high levels of recycled content and materials that can be found regionally will be specified where appropriate.
- The building's fresh air ventilation system will be optimized for energy efficiency and occupant health and comfort.
- Smoking will be prohibited in the building and within 25 feet of any exterior opening, including windows and balcony doors.
- Low-emitting materials complying with recognized third-party standards (South Coast Air Quality Management District Rules, Green Seal Standards, Carpet & Rug Institute Green Label Plus Program) will be installed to help ensure occupant and installer comfort and well-being.

### *Lighting*

The project site would be illuminated with lighting from within the commercial and residential portions of the proposed project, signage lighting and security lighting in the parking levels, in the stairwells, open space areas, and in the hallways of the residential levels. These lights would either be shielded and focused on the project site or located completely indoors.

### *Parking*

The City of Los Angeles Planning Department Residential Parking Policy for Division of Land – No. AA 2000-1 establishes a standard requirement of 2 spaces per dwelling unit for condominium subdivisions of six or more units, plus 0.25 space/unit for guest parking in non-parking congested areas or 0.5 space/unit for guest parking in parking congested areas. The project site is located in a parking congested area. Pursuant to these requirements the mixed-use portion of the proposed project would be required to provide 316 parking spaces for residential tenants (158 units x 2 space/unit), 79 parking spaces for guests (158 units x 0.5 spaces/unit), and 27 parking spaces for commercial uses (4/1,000 x 6,850 square feet). Pursuant to the City’s parking policy, the four townhome units are required to provide eight residential parking spaces (8 units x 2 spaces/unit) and two guest parking spaces (8 units x 0.5 spaces/unit). Thus the proposed project (which would provide a total of 432 parking spaces) would meet the requirements for residential tenants and guests. Therefore, the project will conform to all applicable parking requirements, and no significant off site parking impacts or “overflow” parking into any of the adjoining residential neighborhoods is anticipated.

The applicant has not yet determined whether the project will include for-sale condominiums or for rental apartment units. If the project included residential apartment units instead of condominium units, the parking requirement would be based on LAMC Section 12.21.A.4(a), which requires a ratio of one parking space for each dwelling unit of less than three habitable rooms, one and one-half parking spaces for each dwelling unit of three habitable rooms, and two parking spaces for each dwelling unit of more than three habitable rooms. The proposed project includes 107 units with three habitable rooms and 51 units with more than three habitable rooms. Therefore, 160 total parking spaces would be required for the units with three habitable rooms (107 units x 1.5 spaces/unit) and 102 total parking spaces would be required for the units with more than three habitable rooms (51 x 2 spaces/unit) for a total residential apartment parking requirement of 262 spaces. The four townhome units each include more than 3 habitable rooms and would require 8 parking spaces (4 units x 2 spaces/unit). No guest spaces are required per Code for apartments. The commercial parking requirement would remain the same with 27 parking spaces (4/1,000 x 6,850 square feet). Therefore, a total of 297 parking spaces would be required for the entire project.

### *Public Transportation Opportunities*

There are several bus routes in the study area that provide either direct access to the project site, or provide stops within convenient walking distance (i.e., one-quarter mile). Most of these lines are operated by the Los Angeles County Metropolitan Transportation Authority (MTA), although other transit operators, including Commuter Express, and Antelope Valley Transit, provide service within the proposed project area. Together, these lines offer multiple connection opportunities to the project from the larger regional area, including the Los Angeles communities of Westwood, Brentwood and Pacific Palisades, and the City of Santa Monica to the west; the communities of Cheviot Hills, Rancho Park, and Mar Vista, and the City of Culver City to the south; the Mid-City and downtown areas of Los Angeles to

the east; and the City of West Hollywood and the Hollywood community of the City of Los Angeles to the north, as well as additional local service throughout the City of Beverly Hills.

### *Grading*

Site grading is required to prepare the site for the subterranean parking garage. Based upon the proposed subterranean garage, approximately 45,000 cubic yards (with a 15% contingency) of earth material would be exported.

### *Construction*

Construction of the proposed project is anticipated to begin November 2014, with a duration of approximately 24 months ending, November 2016. However, actual completion of the proposed project is dependent upon local economic conditions.

### *Haul Route*

The proposed haul route is described as follows:

- From 6233 West Wilshire Boulevard (project site) to Puente Hills Landfill at 13130 Crossroads Parkway.
- Loaded Trucks: Exit site, west on Wilshire Boulevard, south on La Cienega Boulevard, east on I-10 freeway, merge onto CA-60 freeway east, Exit 13 to Puente Hills Landfill.
- Empty Trucks: Exit Puente Hills Landfill, CA-60 freeway west, merge onto I-10 freeway west, Exit La Brea Boulevard north, west on Wilshire Boulevard to project site.
- Maximum gross weight: 85,000-90,000 gvwt truck and pul or articulating belly dumps.
- Number and types of vehicles: Number of truck cycling will vary depending on disposal location, estimated to be 5-20 trucks and pups and articulating bottom dumps (total) will be spread throughout the haul period.
- Hours: 7 AM to 6 PM Monday through Friday and 8 AM to 6 PM Saturday, no hauling on Sunday or between 6 PM and 7 AM on Monday through Friday or between 6 PM and 8 AM from Friday to Saturday.
- Total trips per day: 8-10, depending on traffic.
- Duration of project: Mass excavation duration 40-50 days. There will be preceding and succeeding hauling of demo and base rock for a total of approximately 90 days.

## **D. SUMMARY OF DISCRETIONARY ACTIONS**

Implementation of the proposed mixed-use project would require the following discretionary actions from the City of Los Angeles:

1. Vesting Tentative Tract Map (VTT 70316) pursuant to Los Angeles Municipal Code (LAMC) Section 17.15 for the following:
  - A merger and re-subdivision of the subject property into two lots: Lot 1 and Lot 5,
  - The airspace subdivision of Lot 1, including one ground lot and three airspace lots, allocated as follows:
    - One Master/Ground lot;
    - Airspace Lot 2 for residential uses (158 condominium units);
    - Airspace Lot 3 for commercial uses in 8 commercial condominium units; and
    - Airspace Lot 4 for parking,
  - Lot 5 will remain a ground lot subdivision for four residential units, and
  - Approval of the proposed haul route.
2. Per LAMC Section 12.28, a Zoning Administrator's Adjustment to permit the following:
  - Allow the Buildable Area of the lot to be based upon the original lot lines – including the lot area used for required street dedications, the 13-foot prescriptive easement area along Wilshire Boulevard, and the lot area used for required yard setbacks.
  - Reduced easterly side yard setback on proposed Lot 1 from the required 16 feet to 0 feet for the parking podium (floors 1 through 4) only.
  - Covered outdoor common open space area – located on the fifth floor podium level rooftop amenity area – to be excluded in the calculation of floor area.
3. Pursuant to LAMC Section 16.05, approval of Site Plan Review for the proposed project.
4. Variance per LAMC Section 12.27, to allow covered outdoor areas to be included in calculation of common open space but not calculation of permitted floor area.

5. Pursuant to various sections of the LAMC, the Applicant will request approvals and permits from the Building and Safety Department (and other municipal agencies) for project construction activities including, but not limited to the following: demolition, excavation, shoring, grading, foundation, structural footings, building and tenant improvements, street closure permits, and a shuttle for construction workers until the garage is built.

## **E. SUMMARY OF ALTERNATIVES CONSIDERED**

This Draft EIR considers a range of alternatives to the proposed project to provide informed decision-making in accordance with Section 15126.6 of the State CEQA Guidelines. The alternatives analyzed in this Draft EIR include: (1) No Project Alternative, (2) Reduced Height and Density Alternative, (3) Alternative Land Use, Office/Retail, and (4) Reduced Height Alternative.

### **Alternative 1: No Project Alternative**

Under the No Project (No Build) Alternative, the project site would remain developed with the 7,117 square foot bank and associated surface parking lot. The bank would continue to operate, providing financial services to the community. This variation of the No Project Alternative assumes the continuation of existing conditions on the project site as well as the development of the related projects

### **Alternative 2: Reduced Height and Density Alternative**

Under the Reduced Height and Density Alternative, the existing 7,117 square foot bank and associated parking lot would be demolished and an approximately 136,430 square foot mixed-use residential structure and four townhouses, totaling 11,106 square feet, would be developed. This alternative would provide approximately 100 residential units (not including the four townhouses), and approximately 5,130 square feet of ground floor retail space (1,175 square feet restaurant space and 3,955 square feet retail/commercial space). The mixed-use structure would rise 16 stories to a height of 204 feet above grade. Parking for 250 vehicles would be provided in two and one-half subterranean parking garage levels and three above grade parking garage levels.

The townhouses would be planned as they are in the proposed project. They would be located at the northwestern corner of the project site and would rise to a height of 45 feet and 10 parking spaces would be provided at their location.

### **Alternative 3: Alternative Land Use, Office/Retail**

Under the Office Development Alternative, the project site would be developed as a 122,028 square foot office building (3:1 FAR), including 6,850 square feet of ground floor retail uses (same distribution as the proposed project with 1,080 square feet retail space, 1,570 square feet restaurant space, and 4,200 square feet of commercial space), and four condominiums to be located on the northwestern corner of the project site and totaling 11,107 square feet. The design of the office building would be designed with larger floor

plates (20,000 square feet each) but also taller levels (15 feet per office level) to meet market demand. This would make the height of the structure 174 feet height and 10 stories tall. This design would cause the building to be considerably wider and more massive in appearance than the taller but more slender design of the proposed project. The retail portion of the project would be the same as the proposed project. Parking for 366 vehicles would be located in two and one-half subterranean parking garage levels and four above grade parking garage levels.

The four townhouses would be located on the northwestern portion of the project site and would rise to a height of 45 feet. Parking would consist of 10 spaces located in the immediate vicinity of the townhouses.

#### **Alternative 4: Reduced Height Alternative**

Under the Reduced Height Alternative, the project site would be developed with an 175,057 square foot mixed-use project and four townhouses totaling 11,107 square feet. The mixed-use building would contain 158 residential units and 6,850 square feet of ground floor retail (same distribution as the proposed project with 1,080 square feet retail space, 1,570 square feet restaurant space, and 4,200 square feet of commercial space). Parking for 422 spaces would be provided in two and one-half subterranean parking garage levels and four above grade parking garage levels. This project would vary from the proposed project in that the floor plates would be larger thereby reducing the number of stories and the height of the structure. This would cause the building to be wider and therefore more massive in appearance. The building would rise to a height of 204 feet and would rise 18 stories above grade.

The four townhouses would be located on the northwestern corner of the project site and would rise to a height of 45 feet. Parking for 10 spaces would be provided in the vicinity of the immediate vicinity of the townhouses.

## **F. NOTICING AND AVAILABILITY OF THE DRAFT EIR**

The Draft EIR for the proposed Wilshire Crescent Heights Project was prepared by the City of Los Angeles with the assistance of Christopher A. Joseph & Associates. The City of Los Angeles Planning Department forwarded copies of the Draft EIR as well as a Notice of Completion form to the California State Clearinghouse in Sacramento. The public review period for the report extended from August 13, 2009 to September 28, 2009. The purpose of the review period is to provide interested public agencies, groups and individuals the opportunity to comment on the contents and completeness of the Draft EIR and to submit testimony on the possible environmental effects of the proposed project.

This document, together with the Draft EIR, makes up the Final EIR as defined in the State CEQA Guidelines Section 15132 as follows:

*The final EIR shall consist of:*

- (a) *The Draft EIR or a revision of the draft.*

- (b) Comments and recommendations received on the Draft EIR either verbatim or in summary.*
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR.*
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.*
- (e) Any other information added by the lead agency.*

**G. SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

The following pages summarize the various environmental impacts associated with the construction and operation of the proposed project. Mitigation measures are proposed for significant environmental impacts, and the level of impact significance after mitigation is also identified.

**Table I-1  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<b>B. AESTHETICS</b>		
<p><i>Aesthetics or Visual Character</i></p> <p><i>Valued Visual Character</i> The project site contains no valued visual character due to the current state of the site. The implementation of the proposed project would enhance the visual character of the site and immediate surrounding area, as well as the Wilshire area.</p> <p><i>Natural Open Space</i> The project site is located in a highly urbanized area of Los Angeles and is approximately two and one half miles south of the foothill areas of the Santa Monica Mountains (Hollywood Hills). The project site is currently developed with a one-story bank and parking lot. The site does not contain any natural open space areas. Therefore, the project impact on grading of natural open space areas and placement of the proposed structure within open space areas is not significant.</p> <p><i>Aesthetic Value and Image</i> The proposed project is designed to complement and enhance the aesthetic value and image of the surrounding area. To eliminate massing of the proposed structure, the residential portion of the project (levels 5-21) would be provided in a 17-story residential tower set above the podium parking and stepped back from the streets with the tallest portions situated in the center of the structure. The materials on the exterior of the proposed building would consist of non-reflective glass window walls, stucco with cast stone accents, exposed slab edges in typical conditions throughout elevations, gridded exterior plaster patterning, aluminum accents, metal grill work, louvers, and organic plant materials set against exterior walls. The building will be highly modulated with breaks and shifts in the massing and the visual impact of all exterior louvers, vent grills and other non-ornamental features will be limited.</p> <p>Implementation of the proposed project would replace a surface parking lot and one-story bank building with a new, contemporary building that is visually compatible with the several newer or recently renovated high rise buildings in the</p>	<p>No Mitigation Measures required</p>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>vicinity of the project site. The area is slowly undergoing redevelopment to create a more dynamic landscape and skyline reflective of the scale of Wilshire Boulevard as a major transportation and activity corridor.</p> <p>The townhomes to be located on the northwestern portion of the site are similar in scale to the existing residential uses which abut Wilshire Boulevard. The townhouses serve as a transition between uses. Implementation of the proposed project would include the replacement of street trees along Crescent Heights and Wilshire Boulevards. These proposed streetscape features would enhance the visual character of the site and immediate area and the impacts would be beneficial.</p> <p>The proposed project does not distract from the unique image of other buildings in the area, but rather complements other uses. Thus, the project building is sensitive to the unique visual character and image of the area and project impacts to the area's aesthetic value and image would be less than significant.</p> <p><i>Applicable Guidelines and Regulations</i> According to the Wilshire Community Plan, there is no Community Design Overlay for the project site and immediate area. Consequently, there are no corresponding site planning or design guidelines specifically oriented to the project neighborhood. Therefore, no impacts would occur to Applicable Guidelines and Regulations pertaining to site planning or design.</p>		
<p><b>Valued Views and Obstruction</b> Views of the project site would not obstruct, totally block, partially interrupt or create a minor diminishment of a valued public view or provide a visual element that would considerably deter from a valued public view as there are no valued public views in the <i>immediate</i> vicinity. Therefore there would be no significant impact on public views associated with the Proposed Project. The only valued public view would be of the Santa Monica Mountains located approximately 3 miles north of the project site. Intermittent views of the mountains can be seen along the major thoroughfares in the area. Due to the topography of the Los Angeles Basin, views of the mountains can be afforded in many areas and provide a</p>	No Mitigation Measures required	Less than significant

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>backdrop common to the area. The project site does not afford any unobstructed views that would be altered by implementation of the Proposed Project. Therefore, the impact on the view of the mountains looking east would be less than significant.</p> <p><i>Views from a Designated Scenic Highway</i> None of the streets surrounding the project site are designated scenic highways or roadways. The major roadways near the project site include Wilshire Boulevard to the south, Crescent Heights to the west, Fairfax Avenue to the east and Orange Street to the north. These roadways are not designated scenic highways under the Wilshire Community Plan. Therefore, the Project impact on a designated scenic highway would be less than significant.</p> <p><i>Views from a Public Roadway</i> The implementation of the proposed project may impede viewing opportunities of the hills along portions of the surrounding roadways. However, views of the Hollywood Hills are primarily blocked by existing buildings on Wilshire Boulevard. Thus, very limited and intermittent views are currently available. Though project implementation would create a minor diminishment of this valued view (of the Hollywood Hills/Santa Monica Mountains), views are limited and intermittent and views of the hills can be afforded in many other locations. Therefore, the impact on the view of the hills looking north from a public roadway would be less than significant</p>		
<p><b><i>Light and Glare</i></b> The Project Site is located in an urban area where there are high levels of ambient nighttime lighting including street lights, architectural and security lighting, indoor building illumination (light emanating from the interior of structures which passes through windows) and automobile headlights. In addition, the existing bank building and surface parking lot on the project site currently contain a variety of lighting sources. The proposed project would not include exterior materials that would create glare impacts, such as reflective metal or reflective glass materials and ornamentation. Implementation of the project would therefore not produce glare or lighting which would create a visual nuisance, a hazard or result in differential</p>	No Mitigation Measures required	Less than significant

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

<b>Environmental Impact</b>	<b>Mitigation Measures Project Enhancements</b>	<b>Level of Significance After Mitigation</b>
warming of adjacent residential properties. The project impact with regard to glare would be less than significant.		
<p><b>Shade/Shadow</b>  <i>Summer Shadows</i>                      No shadows would be cast on sensitive uses during the summer. Consequently, there would be no summer shadow impacts to shadow-sensitive land uses surrounding the Project Site.</p> <p><i>Winter Shadows</i>                      The sun angle during the winter solstice is responsible for casting the longest shadows of the year, with peak shadows occurring shortly after sunrise and before sunset. The three buildings abutting the project site would be shaded for more than 3 hours. Consequently, winter shadow impacts to these three surrounding shadow-sensitive land uses would be considered potentially significant.</p> <p><i>Spring Shadows</i>                      No shadows would be cast on shadow-sensitive uses for more than 3 hours. As such, there would be no spring shadow impacts to shadow-sensitive land uses surrounding the project site.</p> <p><i>Fall Shadows</i>                      No shadows would be cast on shadow-sensitive uses for more than 3 hours. As such, there would be no fall shadow impacts to shadow-sensitive land uses surrounding the project site.</p>	<p>No mitigation measures are available to mitigate the impacts from the winter solstice shadows on the three buildings immediately adjacent to the project site to the north.</p> <p>No mitigation measures are required to address any other issue areas as there are no other significant impacts.</p>	<p>Significant and unavoidable impact with regards to winter shade/shadows.</p> <p>Less than significant</p>
<p><b>Cumulative Impacts</b>                      Development of the proposed project in conjunction with the related projects would result in redevelopment or infilling of residential, and commercial land uses in the mid-Wilshire Community. Development of these projects in conjunction with the proposed project would result in a substantial change to the visual environment. However, these projects would redevelop and revitalize sites and an area that is</p>	No Mitigation Measures required	Less than significant

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

<b>Environmental Impact</b>	<b>Mitigation Measures Project Enhancements</b>	<b>Level of Significance After Mitigation</b>
<p>currently underutilized, thereby improving the visual character of the area. This cumulative development would also be consistent with the urban character of Wilshire Boulevard, and with the concept of increased development density in Regional Commercial Centers that is encouraged in regional and local plans, including the Wilshire Community Plan.</p> <p>The City of Los Angeles Planning Department shall review any development project within its jurisdiction, which would ensure that the development of the related projects would be consistent with the height, mass and visual character of the existing urban Wilshire community. Therefore, the proposed project in conjunction with the related projects would not result in cumulatively considerable impacts with regard to the aesthetic and visual character of the area.</p>		
<b>C. AIR QUALITY</b>		
<p><b>AQMP Consistency</b> A significant impact may occur if the project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. The project site is located in a highly urbanized area of the City of Los Angeles which provides several modes of public transit service. The site is located within walking distance of the employment and shopping sites for project residents. This type of infill development is consistent with the goals of the AQMP for reducing the emissions associated with new development. Based on this information, the proposed project would be consistent with the 2007 AQMP, and a less-than-significant impact would occur.</p>	No mitigation measures required	Less than significant
<p><b>Construction</b>  <i>Grading and Excavation</i> The analysis of daily construction emissions has been prepared utilizing the URBEMIS 2007 computer model recommended by the SCAQMD. Construction is</p>	<p><b>Construction Equipment Emissions</b> Although the proposed project would result in a less than significant impact with regards to daily significance thresholds during the site development phases, the following is a list of feasible control</p>	

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>anticipated to occur over 22 days each month for approximately 18 months. Construction related daily emissions would not exceed SCAQMD significance thresholds for ROG, NO<sub>x</sub>, CO, SO<sub>x</sub> and PM<sub>10</sub> during construction. Therefore, the potential air quality impact associated with the construction of the proposed project would be less than significant.</p>	<p>measures that the SCAQMD recommends for construction emissions of PM<sub>10</sub>. The analysis presented above assumes implementation of these measures as required under SCAQMD Rule 403.</p> <p>C-1 The project developer shall implement the following measures to reduce the emissions of pollutants generated by heavy-duty diesel-powered equipment operating at the project site throughout the project construction phases. The project developer shall include in construction contracts the control measures as required under Rule 403, at the time of development, including the following:</p> <ul style="list-style-type: none"> <li>▪ Keep all construction equipment in proper tune in accordance with manufacturer's specifications.</li> <li>▪ Use late model heavy-duty diesel-powered equipment at the project site to the extent that it is readily available in the South Coast Air Basin (meaning that it does not have to be imported from another air basin and that the procurement of the equipment would not cause a delay in construction activities of more than two weeks).</li> <li>▪ Use low-emission diesel fuel for all heavy-duty diesel-powered equipment operating and refueling</li> </ul>	

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
	<p>at the project site to the extent that it is readily available and cost effective in the South Coast Air Basin (meaning that it does not have to be imported from another air basin, that the procurement of the equipment would not cause a delay in construction activities of more than two weeks, that the cost of the equipment use is not more than 20 percent greater than the cost of standard equipment. (This measure does not apply to diesel-powered trucks traveling to and from the site.)</p> <ul style="list-style-type: none"> <li>▪ Utilize alternative fuel construction equipment (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent that the equipment is readily available and cost effective in the South Coast Air Basin (meaning that it does not have to be imported from another air basin, that the procurement of the equipment would not cause a delay in construction activities of more than two weeks, that the cost of the equipment use is not more than 20 percent greater than the cost of standard equipment).</li> <li>▪ Limit truck and equipment idling</li> </ul>	

**Table I-1 (Continued)**  
**Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
	<p>time to five minutes or less.</p> <ul style="list-style-type: none"> <li>▪ Rely on the electricity infrastructure surrounding the construction sites rather than electrical generators powered by internal combustion engines to the extent feasible.</li> <li>▪ General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.</li> </ul> <p><i>Construction-Related Fugitive Dust Emissions</i></p> <p>C-2 The project developer shall implement fugitive dust control measures in accordance with SCAQMD Rule 403. The project developer shall include in construction contracts the control measures as may be required under Rule 403 at the time of development, including but not limited to the following</p> <ul style="list-style-type: none"> <li>▪ Use watering to control dust generation during demolition of structures or break-up of pavement. The construction area and vicinity (500-foot radius) must be swept (preferably with water sweepers) and watered at least twice daily. Site wetting must occur often enough to maintain a 10 percent</li> </ul>	

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
	<p>surface soil moisture content throughout all earth moving activities. All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.</p> <ul style="list-style-type: none"> <li>▪ Water active grading/excavation sites and unpaved surfaces at least three times daily.</li> <li>▪ Site access points must be swept/washed within thirty minutes of visible dirt deposition.</li> <li>▪ Sweep daily (preferably with water sweepers) all paved parking areas and staging areas.</li> <li>▪ Onsite stockpiles of debris, dirt or rusty material must be covered or watered at least twice daily.</li> <li>▪ Cover stockpiles with tarps or apply non-toxic chemical soil binders.</li> <li>▪ All haul trucks hauling soil, sand, and other loose materials must either be covered or maintain two feet of freeboard.</li> </ul>	

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
	<ul style="list-style-type: none"> <li>▪ At least 80 percent of all inactive disturbed surface areas must be watered on a daily basis when there is evidence of wind driven fugitive dust.</li> <li>▪ Install wind breaks or green screens at the windward sides of construction areas.</li> <li>▪ Operations on any unpaved surfaces must be suspended when winds exceed 25 mph at the project site.</li> <li>▪ Suspend excavation and grading activity when winds (instantaneous gusts) exceed 15 miles per hour over a 30-minute period or more at the project site, so as to prevent excessive amounts of dust.</li> <li>▪ All haul trucks must have a capacity of no less than twelve and three-quarter (12.75) cubic yards.</li> <li>▪ All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.</li> <li>▪ Traffic speeds on unpaved roads must be limited to 15 miles per hour.</li> <li>▪ Provide daily clean-up of mud and</li> </ul>	

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
	<p>dirt carried onto paved streets from the site as required.</p> <ul style="list-style-type: none"> <li>▪ Install wheel washers or rumble plates for all exiting trucks, wash off the tires or tracks of all trucks and equipment leaving the site or install a crushed rock apron at the site entrance.</li> <li>▪ All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.</li> </ul> <p>An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive fugitive dust generation. Any reasonable complaints shall be rectified within 24 hours of their receipt.</p>	
<p><b>Localized Air Quality Impacts - Construction</b> The daily construction emissions generated by the proposed project are analyzed against SCAQMD’s Localized Significance Thresholds (LSTs) to determine whether the emissions would cause or contribute to adverse localized air quality impacts. On-site emissions generated by the proposed project during the different phases of construction would not exceed the established SCAQMD localized thresholds for NO<sub>x</sub>, CO and PM<sub>10</sub> at a receptor distance of 200 feet. Thus, the on-site construction emissions would also not exceed the SCAQMD localized thresholds at receptor distances beyond 200 feet. Therefore, the localized air</p>	<p>See Mitigation Measures C-1 and C-2 above</p>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

<b>Environmental Impact</b>	<b>Mitigation Measures Project Enhancements</b>	<b>Level of Significance After Mitigation</b>
quality impacts resulting from construction emissions associated with the proposed project would be less than significant for NO <sub>x</sub> , CO and PM <sub>10</sub> .		
<p><b>Operations</b></p> <p><i>Regional Emissions</i> Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities on the project site after occupation. The proposed project would generate daily emissions of ROG, NO<sub>x</sub>, CO, SO<sub>x</sub> and PM<sub>10</sub> which would not exceed the SCAQMD thresholds of significance. Therefore, impacts associated with regional operational emissions from the proposed project would be less than significant.</p>	No mitigation measures required	Less than significant
<p><b>Localized Air Quality Impacts - Operational</b> To determine whether operational emissions generated by the proposed project would result in localized air quality impacts, the operational emissions of the proposed project are analyzed against the SCAQMD's LSTs for a receptor location of 25 meters. The proposed project would generate a net increase in average daily emissions that does not exceed the thresholds of significance recommended by the SCAQMD. Therefore, operational emissions impacts would be less-than-significant.</p> <p><i>Local CO Concentrations</i> Motor vehicles are the primary source of pollutants in the project vicinity. Future CO concentrations near the study intersections would not exceed national or State ambient air quality standards. Therefore, CO hotspots would not occur near these intersections in the future with operation of the proposed project. Therefore, impacts related to local CO concentrations at these intersections would be less than significant.</p>	No mitigation measures required	Less than significant

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p><b>Global Climate Change</b> The emissions generated by the proposed project, and indeed any project, are too small to influence global climate change on their own. Even if an individual project’s GHG emissions were large enough to influence global climate change, the significance of the impact of a single project on global climate cannot be determined at this time. First, no guidance exists to indicate what level of GHG emissions would be considered substantial enough to result in a significant adverse impact on global climate. Second, global climate change models are not sensitive enough to be able to predict the effect of a single project on global temperatures and the resultant effect on climate; therefore, they cannot be used to evaluate the significance of a project’s impact. Thus, insufficient information and predictive tools exist to assess whether a single project would result in a significant impact on global climate. For these reasons, determining the significance of the impact of the proposed project on global climate is speculative, and a reasonable conclusion cannot be reached. Furthermore, there are currently no adopted thresholds or guidance adopted by the SCAQMD or other agencies in California to assess the significance of potential impacts associated with greenhouse gases.</p>	<p>No mitigation measures required</p>	<p>Less than significant</p>
<p><b>Cumulative Impacts</b>  <b>Construction Impacts</b> The City has identified 53 related projects within close proximity to the project site. Construction of these projects could result in additional cumulative impacts on local air quality, particularly fugitive dust impacts, if all were constructed simultaneously. However, cumulative air quality impacts from construction, based on SCAQMD guidelines, are not analyzed in a manner similar to project-specific air quality impacts. Cumulative methods are different than the methodology used throughout this EIR in which all-foreseeable future development within a given service boundary or geographical area is predicted and quantified. Instead, the SCAQMD’s recommends that cumulative air quality analysis methods be based on performance standards and emission reduction targets necessary to attain the federal and State air quality standards identified in the AQMP, which was established to</p>	<p><b>Cumulative Mitigation Measures</b> Although no global warming impacts were identified, the mitigation measures listed below would further reduce GHG emissions.</p> <p>C-3 For the residential development, in accordance with LEED New Construction Energy and Atmosphere Credit 1, the project shall be constructed with materials that reduce thermal loss and energy demand that exceeds Title 24 regulations by 14% or greater, or LEED Homes by 10% or greater.</p> <p>C-4 For the residential development, in</p>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>attain future air quality standards. If an individual project is consistent with the AQMP performance standards, the project’s cumulative impact should be considered less than significant. Based on the analysis provided in the air quality analysis section, the proposed project would be consistent with the AQMP performance standards and consequently, would not result in a significant cumulative air quality impact, and impacts would be less than significant.</p> <p><b>Regional Operational Impacts</b> The 2007 AQMP is based on population growth through the year 2020 developed by each of the cities and counties in the region and incorporated by SCAG into the regional growth projections that are the basis of the AQMP emissions projections. All projects in the region contribute to regional pollution and the emissions associated with these projects are modeled by the SCAQMD to determine future air quality without additional controls. If pollutant concentrations are shown by the model to exceed State or national ambient air standards, the SCAQMD, SCAG and CARB develop additional control strategies to offset emissions and reduce concentrations to below the standards. The project site is in the Los Angeles City sub-area. The City has projected growth to the year 2020 in the 2007 AQMP. SCAG has determined that as long as the new population accommodated by a project is within the total population forecast for the sub-area for the build-out year, the proposed project is consistent with the AQMP and cumulative impacts are offset by the AQMP. The proposed project is not anticipated to cause significant population growth (see Section IV.J, Population and Housing, of this EIR). As such, the proposed project would be consistent with the total population forecast in the AQMP. Therefore, the impact of the proposed project, in conjunction with other projected growth, would not be cumulatively considerable with respect to regional emissions, and impacts would be less than significant.</p> <p><b>Local Operational Impacts</b> The traffic study for the project contains a list of proposed new projects in the vicinity of the project site. Traffic from these related projects was included in the analysis of local traffic impacts and potential carbon monoxide hotspots. Since</p>	<p>accordance with LEED New Construction Indoor Environmental Quality Credit 6.1 or LEED Homes (Multi-family for California) Energy and Atmosphere Credit 8.2, the Applicant shall install lighting system controllability as well as energy-efficient lighting fixtures.</p> <p>C-5 The Applicant shall provide informational packets to new residents within the development locating nearby public transportation options.</p>	

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>future one-hour and eight-hour CO concentrations would be below national and State ambient air standards when the traffic from the proposed project and the other related projects is included in the analysis, impacts of the proposed project in conjunction with related projects would not be cumulatively considerable with respect to local air quality, and impacts would be less than significant.</p> <p><b>Greenhouse Gas Emissions</b></p> <p>As discussed previously, the proposed project would generate GHG emissions. However, the proposed project would be consistent with the 2006 CAT Report strategies that would ensure the goal of reducing State-wide emissions to 1990 levels by 2020 would be met. In addition, the proposed project would incorporate several design features that would exceed Title 24 standards and further reduce GHG emissions. As such, the impact of the project to the cumulative effect of global climate change is not cumulatively considerable and is, therefore, considered to be less than significant.</p>		
<b>D. CULTURAL RESOURCES</b>		
<p><b>Historic Significance</b></p> <p>As the existing structure is less than fifty years of age and does not have any historical, cultural, architectural or archeological significance, it is not listed on the National Register of Historical Places nor is it eligible to be listed. There is no evidence to make findings that the structure is significant in terms of the National Register of Historic Places, the California Register of Historical Resources or as a City of Los Angeles Historic-Cultural Landmark. As such, the proposed project would have no impact with respect to historic resources.</p>	No Mitigation Measures required	No impact
<p><b>Archaeological Resources</b></p> <p>The Native American Heritage Commission performed a Sacred Lands File (SLF) search for the project site and immediate project area. There are no known Native American cultural resources located on the project site or in the immediate vicinity.</p> <p>Three archaeological sites have been identified within a ½-mile radius of the</p>	<p><b>Archaeological Resources</b></p> <p>D-1 If any archaeological materials are encountered during the course of the project development, construction shall be halted in the area of resource discovery. The services of an archaeologist shall be secured by</p>	Less than significant impact with implementation of Mitigation Measures

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

<b>Environmental Impact</b>	<b>Mitigation Measures Project Enhancements</b>	<b>Level of Significance After Mitigation</b>
<p>project site. No sites are located within the project site. Current surface conditions do not allow for an adequate survey of potential surface or subsurface cultural artifacts. Therefore, in order to avoid damaging any previously unidentified cultural resources, an archaeological monitor should be in place for ground disturbing activities. With implementation of mitigation measures listed below impacts to archeological resources would be less than significant.</p>	<p>contacting the Center for Public Archaeology - Cal State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist to assess the resources and evaluate the impact. Copies of the archaeological survey, study or report shall be submitted to the UCLA Archaeological Information Center.</p>	
<p><b>Paleontological Resources</b> The project site is located in an urbanized area which has been previously disturbed by past activities associated with the construction of the existing building. The entire project site and the surrounding area are completely paved and developed. No vertebrate fossil localities lie within the boundaries of the project site. There are vertebrate fossil localities that occur nearby which are from the same sedimentary units that occur as subsurface deposits within the project site. Deeper excavations may well uncover fossils similar to the Rancho La Brea asphalt deposits to the east. Following the Society of Vertebrate Paleontology guidelines for paleontological mitigation, the sensitivity of the area is considered to be of high potential. Any subsurface excavations in the proposed project area below the uppermost areas should be closely monitored to quickly and professionally collect any specimens. With implementation of mitigation measures listed below impacts with respect to paleontological resources would be less than significant.</p>	<p><b>Paleontological Resources</b> D-2 If any paleontological materials are encountered during the course of the project development, construction shall be halted in the area of resource discovery. The services of a paleontologist shall be secured by contacting the Center for Public Paleontology - USC, UCLA, Cal State Los Angeles, Cal State Long Beach, or the County Natural History Museum to assess the resources and evaluate the impact. Copies of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum.</p>	<p>Less than significant impact with implementation of Mitigation Measures</p>
<p><b>Human Remains</b> No known human burials have been identified on the project site or within recorded resources located in the vicinity. While it is possible that human remains could be discovered during construction activities, it is unlikely due to the previously disturbed nature of the project site. Nevertheless, since human remains could be located subsurface and impacts to these resources would be unknown until encountered during excavation, impacts to such resources would be potentially significant.</p>	<p><b>Human Remains</b> D-3 If human remains are discovered at the project site during construction, work at the specific construction site at which the remains have been uncovered shall be suspended, and the City of L.A. Public Works Department and County Coroner shall be immediately notified. If the remains are determined by the County Coroner to be</p>	<p>Less than significant impact with implementation of Mitigation Measures</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
	Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains.	
<p><b>Cumulative Impacts</b></p> <p>Cumulative impacts on historic resources evaluate whether impacts of the proposed project and related projects, when taken as a whole, substantially diminish the number of extant resources within the same or similar context or property type. It is not known at this time if future development of the related project sites would involve historic resources. However, it is anticipated that if historic resources are potentially affected, the related projects would be subject to the requirements of CEQA and City of Los Angeles historic resource protection ordinances. It is further anticipated that the effects of cumulative development on historic resources would be mitigated to the extent feasible in accordance with CEQA and other applicable legal requirements. Consequently, cumulative impacts on historic resources as a result of related project development are expected to be less than significant and thus, when evaluated in conjunction with the proposed project would not be cumulatively considerable. Development of the related projects would also require grading and excavation that could potentially affect archaeological, paleontological resources or human remains. The cumulative effect of these projects would contribute to the continued loss of subsurface cultural resources, if these resources are not protected upon discovery. CEQA requirements for protecting archaeological, paleontological resources and human remains are applicable to development in the City of Los Angeles, as are local cultural resource protection ordinances. If subsurface cultural resources are protected upon discovery as required by law, impacts to those resources would be cumulatively less than significant and would not be cumulatively considerable.</p>	No Mitigation Measures required	Less than significant

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<b>E. GEOLOGY AND SOILS</b>		
<p><b>Groundwater</b></p> <p>Groundwater was not encountered to the maximum depth explored. It should be noted that seasonal fluctuations in groundwater levels may occur. According to the Seismic Hazard Evaluation Report of the Hollywood Quadrangle, by the California Division of Mines and Geology (CDMG), the historical high groundwater in the vicinity of the project site is at an approximate depth of 15 feet below existing grade.</p> <p><b>Seismic Hazards</b></p> <p><i>Ground Surface Rupture</i></p> <p>The project site is located in the seismically active region of Southern California. However, the project site is not located within an Alquist-Priolo Earthquake Fault Zone. No known active faults are mapped as crossing the project site or projecting towards the project site. None of the faults within the project area pose a surface rupture potential to the project site. On this basis, ground rupture due to faulting is not considered a significant hazard at the project site and a less than significant impact would occur.</p> <p><i>Ground Shaking</i></p> <p>The proposed construction would be consistent with all applicable provisions of the City of Los Angeles Building Code, as well as the seismic design criteria contained within the Uniform Building Code. Although the project site is located within 2.8 miles of the active Newport-Inglewood fault, and by many other faults on a regional level, the potential seismic hazard to the project site would not be higher than in most areas of the City of Los Angeles or elsewhere in the region. The City of Los Angeles Building Code includes regulations and requirements designed to reduce risks to life and property to the maximum extent feasible. Therefore, the risks from seismic ground shaking are considered to be less than significant.</p>	<p>The <u>Preliminary Geotechnical Exploration Report, Crescent Heights Project, Proposed Multi-level Development, 6245-6233 Wilshire Boulevard &amp; 652 South Crescent Heights Boulevard, Los Angeles, California</u> found that impacts associated with geology and soils would be less than significant. However, the following mitigation measure reflects project requirements and recommendations of the Geotechnical Report:</p> <p>E-1 The project shall comply with the recommendations listed on pages 8 through 17 in the <u>Preliminary Geotechnical Exploration Report, Crescent Heights Project, Proposed Multi-level Development, 6245-6233 Wilshire Boulevard &amp; 652 South Crescent Heights Boulevard, Los Angeles, California</u>, prepared by Professional Service Industries, Inc., dated August 29, 2007.</p> <p>E-2 Although no groundwater was encountered at a maximum depth, the acknowledgement of historically high groundwater may result in a need for construction dewatering, Los Angeles Regional Water Quality Control Board permitting, and waterproofing in subterranean parking levels.</p>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p><i>Liquefaction</i> Subsurface exploration performed for the Geotechnical Report encountered silty and clayey sands, clayey sands with silts, sandy clays, and clays with no groundwater to an approximate depth of 71 ½ feet below existing grade. The CDMG also indicates that the site is not located within a zone that is prone to liquefaction hazard. Therefore, with regards to liquefaction, a less than significant impact would occur. Based on this site-specific information, the site is considered to have a low risk potential for soil liquefaction.</p> <p><i>Landslides</i> The topography of the project site is relatively flat and the site is not located near any foothills or mountains, meaning that the possibility of landslides occurring on the project site is minimal. In addition, the project site is not located in a hazard zone on the CDMG Seismic Hazard Zone Map. Therefore, the potential impact associated with landslides would be less than significant.</p>		
<p><i>Erosion and Topsoil</i> Although project development has the potential to result in the erosion of soil during site preparation and construction activities, erosion would be reduced by implementation of appropriate erosion controls during grading. The potential for soil erosion during the operation of the proposed project is low due to the generally level topography of the area and the fully developed aspects of the project site at the completion of build-out. With implementation of the applicable grading and building permit requirements and the application of Best Management Practices, a less than significant impact would occur with respect to erosion or loss of topsoil.</p>	See Mitigation Measures E-1 above	Less than significant
<p><i>Expansive Soils</i> Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. A representative sample of the near surface soil was tested to identify its expansive characteristics. The test result indicated that the tested soil has a low expansion potential. With construction of the proposed project in accordance with the Los</p>	See Mitigation Measures E-1 above	Less than significant

**Table I-1 (Continued)**  
**Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
Angeles Building Code Chapter IX, a less than significant impact associated with expansive soils would occur.		
<p><b>Cumulative Impacts</b></p> <p>Geotechnical impacts related to future development in the City would involve hazards related to site-specific soil conditions, erosion, and ground shaking during earthquakes. These impacts would be site-specific and would not be common to nor shared with the impacts on other sites. Furthermore, development of each of the related projects and the proposed project would be subject to uniform site development and construction standards that are designed to protect public safety. Therefore, cumulative geotechnical impacts would be less than significant.</p>	No Mitigation Measures required	Less than significant
<b>F. HAZARDS AND HAZARDOUS MATERIALS</b>		
<p><u>Hazardous Materials/Hazardous Wastes</u></p> <p>No petroleum products, hazardous substances, drums, suspect containers, or aboveground or underground storage tanks were observed on the project site. However, the repair shop that was previously located on the eastern portion of the project site represents a recognized environmental condition. A total of 20 soil samples were taken at four locations throughout the project site. Concentrations of VOCs were not detected in any of the analyzed soil samples. Motor oil range (MORO) petroleum hydrocarbons were detected at one location at a depth of 20 feet. The Los Angeles Regional Water Quality Control Board Maximum Soil Screening Level for MORO impacted soil located between 20 and 150 feet above the groundwater table is 10,000 mg/kg. The detected concentration was well below this screening level. No other concentrations of TPH were detected above laboratory detection limits in the analyzed soil samples. As no hazardous materials or wastes were observed on the project site, and soil contamination was not detected above screening levels, impacts would be less than significant.</p>	No Mitigation Measures required	Less than significant
<u>Polychlorinated Biphenyls (PCBs)</u>	No Mitigation Measures required	Less than significant

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>PSI observed a pole mounted transformer on the northern portion of the project site which is owned and operated by Southern California Edison. No evidence of staining or leaking was observed in the area of this transformer. Based on the observed condition of the transformer, it does not appear to represent evidence of a recognized environmental condition and a less than significant impact would occur.</p>		
<p><u>Asbestos-Containing Materials (ACMs)</u> Suspect materials identified during the interior site reconnaissance included gypsum wall board, floor tiles, and acoustical ceiling tiles. Due to the age of construction of the building there exists a potential for asbestos containing materials to be present at the project site. Prior to demolition, a comprehensive asbestos survey should be conducted. In accordance with the EPA’s NESHAP regulation and SCAQMD’s Rule 1403, all materials, which are identified as ACMs shall be removed by a trained and licensed asbestos abatement contractor. As onsite ACMs shall be removed in accordance with all applicable regulations, the potential for ACM exposure would no longer exist. Therefore, impacts with regards to ACMs would be less than significant.</p>	<p><i>Asbestos-Containing Materials (ACMs)</i> F-1 Prior to the issuance of the demolition/renovation permits, the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant that no ACMs are present in the buildings. If ACMs are found to be present, they shall be abated in compliance with the South Coast Air Quality Management District’s Rule 1403, as well as other state and federal regulations. Specific requirements of Rule 1403 include:</p> <ul style="list-style-type: none"> <li>• Implementation of a thorough survey of the affected facility prior to issuance of permits for any demolition or renovation activity, including inspection, identification, and quantification of all friable and certain non-friable asbestos-containing materials.</li> <li>• Surveys which include collection and analyses of representative asbestos building material samples, and quantification of these</li> </ul>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
	<p>materials for asbestos abatement purposes prior to or during demolition/renovation.</p> <ul style="list-style-type: none"> <li>• Notification of the SCAQMD of the intent to demolish or renovate any facility at least ten days prior to commencing with the activity.</li> <li>• Removal of all asbestos-containing materials prior to any demolition or renovation activity that would break up, dislodge, or similarly disturb the material.</li> <li>• Use of legally required procedures when removing asbestos-containing materials.</li> <li>• Placement of all collected asbestos-containing materials in leak-tight containers or wrapping.</li> <li>• Disposal of asbestos-containing materials as required by applicable regulations.</li> </ul>	
<p><u>Lead-Based Paint (LBP)</u> Given the age of the existing structure, lead based paint is conservatively assumed to be present, and the safe handling of such material is required to prevent adverse impacts. The demolitions of buildings containing lead based paint are subject to a</p>	<p><i>Lead-Based Paint (LBP)</i> F-2 Prior to issuance of permits for any demolition/renovation activity involving a particular structure, a lead-based paint assessment of each existing apartment</p>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>comprehensive set of California regulations. Construction workers are protected pursuant to Construction Safety Orders Section 1532.1 of Title 8 of the California Code of Regulations. Lead-contaminated debris and other wastes must be managed and disposed of in accordance with applicable provisions of the California Health and Safety Code. With compliance with all applicable rules and regulations, hazardous materials impacts relative to exposure to lead-based paint would be less than significant.</p>	<p>structure shall be conducted. Lead-based paint found in any buildings shall be removed and disposed of as a hazardous waste in accordance with all applicable regulations. Such regulations that would be followed during demolition include Construction Safety Orders 1532.1 (pertaining to lead) from Title 8 of the California Code of Regulations, and lead exposure guidelines provided by the U.S. Department of Housing and Urban Development (HUD).</p>	
<p><u>Mold Baseline Survey</u> The mold baseline survey did not observe the presence of observable mold and did not identify physical deficiencies conducive to mold. Therefore impacts with regards to mold would be less than significant.</p>	<p>No Mitigation Measures required</p>	<p>Less than significant</p>
<p><u>Methane Gas</u> The project site is located within a City of Los Angeles High Potential Methane Zone.</p> <p>Five shallow soil-gas probes were installed throughout the project site at a depth of five feet below ground surface to assess shallow concentrations of methane gas. Methane gas was detected at four locations at concentrations ranging from 24 to 7,600 parts per million (ppm). As a result, nested soil-gas probes were installed at the locations of the three shallow gas probes with the highest detected concentrations of methane gas.</p> <p>Methane gas was detected at all three nested probes with the highest detected methane concentration (130,000 ppm) being detected at depths of 20 and 25 feet. On the second round of testing methane gas was again detected in all three borings with the maximum concentration (130,000 ppm) being detected at a depth of 25</p>	<p><i>Methane Gas</i> F-3 The project shall implement all appropriate mitigation measures prescribed in the City of Los Angeles Methane Hazard and Methane Buffer Zone level 5 design criteria as found on pages 16 to 25 of the report. These mitigation measures would include, but not be limited to, passive and active mechanical venting systems, methane gas detection alarms, and impermeable membranes beneath the building.</p>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

<b>Environmental Impact</b>	<b>Mitigation Measures Project Enhancements</b>	<b>Level of Significance After Mitigation</b>
<p>feet. According to the City of Los Angeles Methane Hazard and Methane Buffer Zone design criteria, the methane design level for the proposed project would be level 5. This design level calls for the highest amount of methane gas mitigation levels. With implementation of the City of Los Angeles Methane Hazard and Methane Buffer Zone design criteria of level 5, impacts regarding methane gas would be mitigated to a less than significant level.</p>		
<p><i>Operational Impacts</i> The implementation of the proposed project would use, at most, minimal amounts of hazardous materials for routine cleaning and therefore would not pose any substantial potential for accident conditions involving the release of hazardous materials. As discussed previously, the proposed project does not include elements or aspects that will create or otherwise emit any health hazard or potential health hazard. The proposed project would not involve the routine transport, use or disposal of hazardous material. The proposed project would not produce hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste. Therefore, impacts concerning release of hazardous materials into the environment would be less than significant.</p>	No Mitigation Measures required	Less than significant
<p><b>Cumulative Impacts</b>  Impacts with respect to hazards and hazardous materials are generally site specific. Each of the related projects would require evaluation for potential threats to public safety, including those associated with routine transport, use, or disposal of hazardous materials; upset and accident conditions involving the release of hazardous materials into the environment; hazardous emissions in proximity to an existing or proposed school; hazardous materials site listing; and interference with an adopted emergency response or evacuation plan. Because hazardous materials and risk of upset conditions are largely site-specific, this would occur for each individual project affected, in conjunction with the development proposals on these properties. Further, local municipalities are required to follow local, state, and federal laws regarding hazardous materials and other hazards. Therefore, with</p>	No Mitigation Measures required	Less than significant

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
compliance with local, state, and federal laws pertaining to hazards and hazardous materials, cumulative impacts would be less than significant.		
<b>G. HYDROLOGY AND WATER QUALITY</b>		
<p><i>Construction</i> There are three general sources of short-term construction-related stormwater pollution associated with the proposed project: (1) the handling, storage, and disposal of construction materials containing pollutants; (2) the maintenance and operation of construction equipment, and (3) earth moving activities which, when not controlled, may generate soil erosion. Construction activities must adhere to the relevant stormwater management regulations under Los Angeles County’s NPDES Permit No. CA0061654. When properly designed and implemented, these Best Management Practices (BMPs) would ensure that short-term construction related water quality impacts are not significant.</p>	<p>Implementation of the proposed project in compliance with the established water quality control programs listed below would ensure that the project’s short-term construction related water quality impacts, as well as its long-term operational water quality impacts, would be less than significant. The following are standard water quality control programs and regulations with which the proposed project would be required to comply:</p> <ul style="list-style-type: none"> <li>• County of Los Angeles Standard Urban Mitigation Plan (SUSMP)</li> <li>• National Pollution Discharge Elimination System (NPDES), including all provisions of the General Construction Activity Storm Water Permit which required the preparation of a Storm Water Pollution Prevention Plan (SWPPP) that emphasizes the use of Best Management Practices (BMPs).</li> <li>• Order No. 90-079 of the Regional Water Quality Control Board, Los Angeles Region, which regulates the issuance of waste discharge requirements within the Los Angeles Region under NPDES Permit No. CA0061654 and dewatering pursuant to the</li> </ul>	Less than significant

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
	<p>requirements of NPDES Permit No. CAG994004</p> <ul style="list-style-type: none"> <li>• City of Los Angeles Ordinances No. 172,176, Ordinance No. 173,494 and Chapters IX, Division 70 of the Los Angeles Municipal Code.</li> </ul> <p>The following are standard City of Los Angeles mitigation measures that are required to ensure compliance with all code and ordinance requisites:</p> <p>G-1 All waste shall be disposed of properly according to federal, state, and local laws. Toxic wastes shall be discarded at a licensed regulated disposal site.</p> <p>G-2 Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.</p> <p>G-3 Do not hose down pavement at material spills. Dry cleanup methods shall be used whenever possible.</p> <p>G-4 Dumpsters shall be covered and maintained where feasible. Place uncovered dumpsters under a roof or cover with tarps or plastic sheeting.</p> <p>G-5 Where truck traffic is frequent, gravel approaches shall be used to reduce soil compaction and limit the tracking of</p>	

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
	sediment into streets. G-6 All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop cloths shall be used to catch drips and spills.	
<p><i>Operation</i>                      Under existing conditions, runoff from the project site may contain urban pollutants such as automotive fluids, heavy metals and chemical constituents, fertilizers, pesticides and herbicides that could be discharged into the storm drainage system. There would be no substantial increase in runoff as a result of the proposed project, therefore, urban contaminants that may be present in urban runoff from the site would not differ substantially in type or quantity than that which currently exists. The project would be designed in compliance with Order No. 90-079 of the Regional Water Quality Control Board, Los Angeles Region, which regulates the issuance of water discharge requirements to Los Angeles County (including Cities that are tributaries to the County for stormwater discharge), under NPDES Permit No. CA006154. The proposed project would be required to submit site drainage plans to the City Engineer and other responsible agencies for review and approval prior to development of any drainage improvements. Impacts to stormwater quality as a result of project implementation would be less than significant.</p>	No Mitigation Measures required	Less than significant

**Table I-1 (Continued)**  
**Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p><b>Groundwater</b></p> <p>The proposed project would not contribute to groundwater depletion or interfere with groundwater recharge to an environmentally significant degree. Therefore, potential impacts to groundwater supplies or recharge would be less than significant. Direct additions or withdrawals of groundwater are not proposed by the project. Furthermore, the proposed project would slightly decrease the amount of impervious surfaces (e.g., structures, concrete, and asphalt). The proposed project would replace a parking lot with a mixed-use project, which would result in an increase in water demand. However, it is not anticipated that the added water demands of the proposed project would exceed current supply</p>	No Mitigation Measures required	Less than significant
<p><b>Surface Water Hydrology</b></p> <p>The proposed development would not result in a change in the project site coverage from existing setting conditions and would include approximately the same impervious and permeable surface ratios. Thus, there would be no increase in the total run-off from the project site. Though specific layout of the drainage devices on the site are not known at this time, the proposed on-site storm drain system would deliver the peak run-off values not exceeding existing conditions. Therefore, the project would not result in any significant impacts related to the amount of rate of stormwater runoff or drainage system effects. Project specific impacts associated with drainage and surface runoff and the potential for increased flooding would be less than significant.</p> <p>Runoff from the project site currently is and would continue to be collected on the site and directed towards existing storm drains in the project vicinity. All contaminants gathered during such routine drainage would be disposed of through compliance with applicable stormwater pollution prevention permits. Therefore, the proposed project would not provide substantial additional sources of polluted runoff to the storm drain system or increase storm water runoff from the project site above existing levels. Therefore, impacts related to project surface stormwater runoff would be less than significant.</p>	No Mitigation Measures required	Less than significant

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p><b>Flooding</b> There are no lakes, rivers, or streams that flow within, through, or near the project site, and no ephemeral ponds exist on the project site. The closest major waterways/dams to the project site are the Hollywood and Silver Lake Reservoirs which are located approximately 4 and 5.5 miles to the northeast, respectively, of the project site. The project site is not located within the boundaries of the inundation zones for either of these reservoirs. The City of Los Angeles Bureau of Engineering designates the project site as within Flood Zone C. According to Federal Emergency Management Agency (FEMA), Flood Zone C describes flood insurance rate zones that are located outside of the 500-year floodplain, with minimal chance of flooding. Furthermore, the project site is located in a dense urban area that is completely surrounded by existing urban uses. Also, development of the proposed project would not introduce persons or structures into an area where they might be subject to flood hazards not previously experienced. In addition, implementation of the proposed project would not place structures which would impede or redirect flood flows. Therefore, flooding impacts as a result of project implementation would be less than significant. The project site is not located proximate to coastal waters, and as such, is not susceptible to tsunami (seismically induced tidal wave) hazards. Therefore, impacts relating to seiche and tsunami would be less than significant. Although the project site is located near the Hollywood Reservoir water storage facility, according to the LADWP no seiche at an LADWP facility has ever been recorded, even during the 1994 Northridge earthquake, and therefore, the LADWP does not consider seiches to be a potentially significant hazard.</p>	<p>No Mitigation Measures required</p>	<p>Less than significant</p>
<p><b>Cumulative Impacts</b> Development of the proposed project in combination with the related projects would result in further development or redevelopment in an already urbanized area.  Runoff from the project site and the surrounding urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is</p>	<p>No Mitigation Measures required</p>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

<b>Environmental Impact</b>	<b>Mitigation Measures Project Enhancements</b>	<b>Level of Significance After Mitigation</b>
likely that most, if not all, of the related projects would also drain to the surrounding street system. However, little, if any additional cumulative runoff would be expected from the project site and the related project sites since this part of the City is already fully developed with impervious surfaces. Therefore, cumulative impacts to the existing or planned stormwater drainage system would be less than significant. In addition, development on each site would be subject to uniform site development and construction standards that are designed to ensure water quality and hydrological conditions are not adversely affected. All of the related projects would be required to implement BMPs and to conform to the existing NPDES water quality program. Therefore, cumulative water quality impacts would not be cumulatively considerable and would be less than significant.		
<b>H. LAND USE</b>		
<p><b><i>Physically Divide an Established Community</i></b>                      The potential for the proposed project to physically divide an established community is based on comparison of the existing land uses on and adjacent to the proposed project site. As previously discussed, the project site is developed with a bank and surface parking lot. The entire project site is surrounded by either existing structures including multi-story buildings or surface parking areas. Wilshire Boulevard is characterized by commercial uses, however adjacent and surrounding uses to the north are medium density, multi-family apartment buildings. Therefore, the proposed project would not physically divide any established community or uses (and existing neighborhoods, communities, or land uses would not be disrupted, divided or isolated) and impacts would be less than significant.</p>	No Mitigation Measures required	Less than significant
<p><b><i>Conflict with Applicable Conservation Plan or Natural Community Conservation Plan</i></b>                      The project site is not included in or involved with any conservation plan or natural community conservation plan. As previously discussed, the project site is located in a highly urbanized area of the City of Los Angeles. The project site is currently</p>	No Mitigation Measures required	Less than significant

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>fully developed with a bank building and a surface parking lot. Therefore, the proposed project would not conflict with any habitat conservation plan or community conservation plan and there would be no impact.</p>		
<p><b>Land Use Consistency</b></p> <p><i>City of Los Angeles General Plan Framework Element</i>                      The project site is located within the Regional Center category of the General Plan Framework. Regional Center is a focal point of regional commerce containing a diversity of uses such as residential and retail uses as proposed by the project. The General Plan Framework is a guiding point for the future of the community. The Framework suggests that a Regional Center would contain structures between 6- and 20- stories with a floor area ratio of between 1.5:1 and 6.0:1. The proposed project is proposing a floor area ratio of 3.0:1 on the Lot 19 (the smaller portion of the site zoned [Q]R3-1-O) and 4.5:1 on Lots 15-18 (the majority of the site which is zoned [Q]C4-2D-O and fronts Wilshire Boulevard) which is within the envisioned floor area ratio for this type of development. Further, the proposed project's integration of housing and commercial uses in a commercially-designated area adjacent to a residential area is consistent with the goals and policies of the General Plan Framework in reinforcing the Regional Center character of the area. Therefore, no significant impacts due to consistency with land use designations in the General Plan Framework are anticipated.</p> <p><i>City of Los Angeles Transportation Element</i>                      The City's Transportation Element calls for citywide congestion reduction by linking population, and employment concentrations, with transit systems. By linking land use, transportation, and air quality decisions, this legislation encourages more effective use of all transportation modes. The Transportation Element recognizes the contribution of a proper juxtaposition of land uses to the reduction of vehicle trips. Locating land uses that better serve the needs of the population closer to where they work and live reduces the number and the distance of vehicle trips, resulting in congestion relief and a decrease in pollution from</p>	<p>No Mitigation Measures required</p>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>mobile sources.</p> <p>There are several bus routes in the project vicinity that provide either direct access to the project site, or provide stops within convenient walking distance (i.e., one-quarter mile). Most of these lines are operated by the Los Angeles County Metropolitan Transportation Authority (MTA), although other transit operators, including Commuter Express, and Antelope Valley Transit, provide service within the proposed project area. Together, these lines offer multiple connection opportunities to the project from the larger regional area. The proposed project would locate housing and employment in an area served by numerous public transportation opportunities, and would therefore be consistent with Transportation Element of the Los Angeles General Plan.</p> <p><i>Wilshire Community Plan</i></p> <p><u>Land Use Designation</u> The Citywide General Plan Framework Element generally refers to the Community Plans for specific land use locations and entitlements. The Wilshire Community Plan designates the project site as Regional Center Commercial and refers to the City of Los Angeles Municipal Code for specific land uses permitted within this designation. The proposed project would be consistent with the Regional Center Commercial land use designation. Therefore, impacts on the existing land use designation would be less than significant.</p> <p><i>Los Angeles Municipal Code</i> The project site has a dual zoning designation. The southern portion of the site, Lots 15-18 are zoned [Q]C4-2D-O (Commercial, Height District No. 2, D, Development Limitations, Oil Drilling District). The smaller northern portion of the site is zoned [Q]R3-1-O. With approval of the requested discretionary actions impacts to zoning designation would be less than significant.</p> <p><u>Height/Floor-Area-Ratio</u> By right, Height District 2 permits an FAR of 6:1 on the C4 portion of the site</p>		

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>(233,406 square feet, before dedication and 206,016); however, the “D” limitation further restricts the FAR to 3:1, but allows it to exceed 3:1 if the additional floor space is used for ground floor retail or residential uses. The proposed project provides both ground floor retail and residential uses and thus an FAR of 4.5:1 would be permitted for the C4 portion of the project site (175,057 square feet before dedication and 154,514 after dedication). The R3 portion of the site is limited to an FAR of 3:1 (11,107 after setbacks). The proposed project (154,514 square feet) would therefore be compatible with the FAR of 4.5:1 for the C4 portion and 3:1 FAR for the R3 portion of the site. Therefore, impacts with respect to floor area ratio would be less than significant with approval.</p> <p><u>Density</u> The proposed project is a mixed use development on a site zoned C4 and R3 and designated as a Regional Center. In accordance with Section 12.22.A18 of the City of Los Angeles Planning and Zoning Code, the proposed project’s residential density on the southern portion of the site is governed by the R5 standards. Per Section 12.12 C 4 (c), the R5 zone requires a minimum of 200 square feet of lot area per dwelling unit. A maximum total of 194 residential units could be constructed on the C4 portion of the site and a maximum of five units could be constructed on the R3 portion of the site. The proposed project would provide a total of 158 residential (condominium) units and four stand alone townhouse units. Therefore, the proposed project is consistent with residential zoning density requirements and impacts would be less than significant.</p> <p><u>Setback Requirement</u> The applicant requests a Zoning Administrators Adjustment pursuant to L.A.M.C. Section 12.28 to permit portions of the proposed project to maintain zero-foot easterly side yard in lieu of 16-foot side yard. The granting of an adjustment will result in development compatible and consistent with the surrounding uses because zero yard setbacks for a mixed use development encourage an active urban streetscape of human scale. The area surrounding the project site to the east is entirely commercial, observing no required yards.</p>		

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>Therefore the granting of an adjustment would result in development compatible and consistent with the surrounding uses and the impacts of the adjustment would be less than significant.</p> <p>The parking analysis for the proposed project compared the proposed parking supply to the requirements of the Los Angeles Municipal Code. According to the Code, a proposed development project is required to provide an adequate supply of parking spaces based on the proposed land use for the site. The proposed project is considered to have a significant parking impact if the proposed parking supply does not meet the parking demand specified by the Code.</p> <p>The project consists of 158 condominium units, four townhouses and 6,850 square feet of commercial (retail) uses. The proposed project would provide 422 parking spaces within two and one-half subterranean levels and four above grade levels. For retail customers, 27 parking spaces are provided at the ground level and the first subterranean level. Access to these spaces would be via a driveway on Wilshire Boulevard. The remaining 395 parking spaces would be designated for the residential tenants and guests and would be provided on all levels of the parking structures with the exception of the ground floor. For residential tenants, vehicular access will be located along both Wilshire Boulevard and Crescent Heights Boulevard. An additional 10 parking spaces would be provided at the location of the townhomes for tenant and guest parking. Therefore, the total number of spaces provided would be 432 (422 + 10).</p> <p>The <i>City of Los Angeles Planning Department Residential Parking Policy for Division of Land – No. AA 2000-1</i> establishes a standard requirement of 2 spaces per dwelling unit for condominium subdivisions of six or more units, plus 0.25 space/unit for guest parking in non-parking congested areas or 0.5 space/unit for guest parking in parking congested areas. The project site is located in a parking congested area. Pursuant to these requirements the proposed project would be required to provide 316 parking spaces for residential tenants (158 units x 2</p>		

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>spaces/unit), 79 parking spaces for guests (158 units x 0.5 spaces/unit), eight parking spaces for townhome tenants (4 units x 2 spaces/unit), two spaces for townhome guests (4 units x 0.5 spaces/unit), and 27 parking spaces for commercial uses (4/1,000 x 6,850 square feet). Thus the proposed project (which would provide 432 parking spaces) would meet the requirements for residential tenants and guests. The proposed project would provide one space fewer than the 28 spaces required for the commercial parking, but it should be noted that the commercial parking requirements identified are calculated assuming specific land uses. Final tenant parking requirements will be dependent on the actual tenant mix occupying the site and therefore, the project is reasonably compliant with the current LAMC requirements based on currently anticipated uses. Therefore, the project will conform to all applicable parking requirements, and no significant off site parking impacts or “overflow” parking into any of the adjoining residential neighborhoods is anticipated.</p> <p><i>Regional Comprehensive Plan and Guide</i> The project site is located within the six-county region that comprises the SCAG planning area. Overall, the proposed project would work to implement, key regional policies applicable to the project site and surrounding areas.</p> <p><i>Walkability Checklist</i> The proposed project would be consistent with the Walkability Checklist as it applies to the proposed project. The pedestrian environment is an important asset along Wilshire Boulevard and would be enhanced by the proposed project. The project site in its current state contains no pedestrian amenities as it is a single use bank and parking lot. Therefore, implementation of the proposed project would improve the pedestrian environment by providing a structure that contains retail uses available to pedestrians with access along the sidewalk. Therefore, the proposed project would comply with walkability requirements.</p>		
<p><b>Land Use Compatibility</b> The proposed building would have varying setbacks at different levels to reduce</p>	No Mitigation Measures required	Less than significant

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

<b>Environmental Impact</b>	<b>Mitigation Measures Project Enhancements</b>	<b>Level of Significance After Mitigation</b>
<p>the impact of the height of the structure to existing structures on Orange Street. Further, it is not uncommon to locate multi-family structures adjacent to commercial uses. Examples of this mix are currently found nearby along Santa Monica Boulevard and on Wilton Place. Therefore, there are no impacts identified with placement of project uses in relation to the existing surrounding uses of the project site. Therefore, no significant impacts would result from the proposed project with regard to land use compatibility.</p>		
<p><b>Cumulative Impacts</b></p> <p>The related projects would be required to either generally conform to the zoning and land use designations for each site or be subject to specific findings and conditions which are based on maintaining general conformance with the land use plans applicable to the area. As such, development of the proposed project and related projects is not anticipated to substantially conflict with the intent of the City’s General Plan regarding the future development of the Wilshire Community Plan area, or with other land use regulations required to be consistent with the General Plan, such as the Planning and Zoning Code. Development of the proposed project, in conjunction with related projects, would not be expected to result in cumulatively considerable effects with respect to land use regulations.</p> <p>Development of the related projects is expected to occur in accordance with adopted plans and regulations. Based upon the information available regarding the related projects, it is reasonable to assume that the projects under consideration in the surrounding area would implement and support important local and regional planning goals and policies. The cumulative impacts of the project and related projects are less than significant.</p>	<p>No Mitigation Measures required</p>	<p>Less than significant</p>
<p><b>I. NOISE</b></p>		
<p><b>Construction Noise</b> Construction of the proposed project would require the use of heavy equipment for site clearing and grading, installation of utilities, paving, and building fabrication.</p>	<p><b>Construction Noise and Vibration</b> The following mitigation measures are recommended to address construction-related noise and vibration</p>	<p>Implementation of Mitigation Measures I-1 through I-7 would</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>Development activities would also involve the use of smaller power tools, generators, and other sources of noise. During each stage of development, there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of the activity. Construction activities would primarily affect the existing residences located to the north of the project site. These residences are located from approximately 25 feet from the project boundary. Temporary construction noise levels could periodically exceed 85 dBA CNEL. Therefore, construction activities would increase noise levels at these homes by more than five dBA CNEL for 10 days in a three month period as the proposed project would be expected to take several months to complete. The use of mufflers on construction equipment could reduce their noise levels by an average of 3 dBA. However, the resulting noise levels would still be greater than five dBA over the existing conditions without the Project. This is a potentially significant impact.</p> <p><b>Construction-Related Groundborne Vibration</b> Construction activities that would occur within the project site may have the potential to generate low levels of groundborne vibration. Construction activities may have the potential to impact the multi-family residences to the north. Groundborne Vibration Levels at Off-site Sensitive Uses From Project Construction, these vibration levels would be approximately 87.5 VdB at the closest portions of these multi-family residences. Overall, the multi-family residences would be exposed to vibration levels that exceed FTA’s threshold of 80 VdB for buildings where people would normally sleep. However, the construction activities and their associated vibration levels would vary according to phase of construction and would be limited to daytime hours between 7:00 AM through 6:00 PM Monday through Friday and between 8:00 AM to 6:00 PM Saturdays.</p>	<p>impacts:</p> <p>I-1 The project shall restrict construction and demolition activities to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday.</p> <p>I-2 Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.</p> <p>I-3 The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized to the extent feasible. Examples include the use of drills, jackhammers, and pile drivers.</p> <p>I-4 The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.</p> <p>I-5 Noise construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.</p> <p>I-6 Equipment warm-up areas, water tanks, and equipment storage areas shall be located as far as possible from the surrounding</p>	<p>serve to reduce noise and vibration levels associated with construction at the project upon the adjacent multi-family residences. However, due to the close proximity of the adjacent multi-family residences, noise and vibration levels would continue to result in a temporary significant and unavoidable impact.</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
	residential uses. I-7 Flexible sound control curtains shall be placed around drilling apparatuses and drill rigs used within the project site. I-8 During construction, an approximate 15-foot, temporary plywood barrier shall be erected along the northern boundary of the project site to reduce construction noise impacts on nearby sensitive receptors. The plywood barrier shall be erected prior to demolition activities and remain in place until exterior construction has been completed.	
<p><b>Operational Noise</b></p> <p><i>On-Site Parking Facilities</i>                      Noise would also be generated by activities within the proposed structured parking facilities within the project site. Automobile movements would comprise the most continuous noise source and would generate a noise level of approximately 56 dBA CNEL at a distance of 50 feet, while car alarm and horn events, which would occur less frequently, would generate maximum noise levels as high as 49 dBA CNEL at a distance of 50 feet. Overall a composite noise level of 60 dBA CNEL at a distance of 50 feet is typically associated with parking structures. Therefore, noise levels would not exceed the <u>L.A. CEQA Thresholds Guide</u> standards of 60 dBA CNEL for single-family residential uses or the 65 dBA CNEL standards for multi-family residential uses and transient uses. Thus, impacts associated with noise generated as a result of the operation of the proposed parking facilities would not adversely affect the proposed residential uses on the project site. Therefore, this impact would be less than significant.</p> <p><i>Off-Site Vehicular Noise</i>                      An increase in traffic resulting from implementation of the proposed project may increase the ambient noise levels at sensitive off-site locations in the project</p>	No Mitigation Measures required	Less than significant

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>vicinity.</p> <p>Off-site locations in the project vicinity would experience a slight increase in noise resulting from the additional traffic generated by the proposed project. The proposed project would increase local noise levels by a maximum of 0.1 dBA CNEL for several roadway segments. It should be noted that several of the analyzed roadway segments would not experience an increase in roadway noise as a result of the proposed project. Since the increase in local noise levels at all of the analyzed roadway segments resulting from implementation of the proposed project would not exceed the thresholds in the <u>L.A. CEQA Thresholds Guide</u>, they would not represent a substantial permanent increase in ambient noise levels. Therefore, this impact would be less than significant.</p> <p><i>On-Site Non-Vehicular Noise</i></p> <p><i>HVAC Systems</i></p> <p>Upon buildout of the proposed project, new sources of noise would include stationary sources, such as rooftop heating, ventilation, and air conditioning (HVAC). The HVAC systems that would be installed for the proposed project would typically result in noise levels that average between 40 and 50 dBA L<sub>eq</sub> at 50 feet from the equipment. These noise levels would not exceed the City’s exterior noise level standard of 60 dBA CNEL for the nearby single-family residences. Therefore, this impact would be less than significant.</p>		
<p><b>Cumulative Impacts</b></p> <p><i>Cumulative Construction Noise and Vibration</i></p> <p>Development of the proposed project in conjunction with the related projects would result in an increase in construction-related noise and vibration in this already urbanized area of the City of Los Angeles. However, each of the related projects would be subject to the LAMC Section 112.05, which reduces construction noise and vibration impacts to the maximum extent feasible by prohibiting loud,</p>	<p>No Mitigation Measures required</p>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>unnecessary, and unusual construction activities within 500 feet from any residential zone, and LAMC Section 41.40, which limits the hours of allowable construction activities. Conformance with these City regulations would reduce construction-related noise and vibration for the related projects. As such the proposed project would not contribute to a cumulatively considerable noise and vibration impact due to construction and impacts would be less than significant.</p> <p><i>Cumulative Operational Noise</i> Cumulative mobile source noise impacts would occur primarily as a result of increased traffic on local roadways due to the proposed project and related projects within the study area. None of the study roadway segments in the project vicinity would experience a substantial permanent increase in ambient noise levels resulting from future ambient growth with the proposed project (as compared to cumulative conditions without the proposed project). Therefore, cumulative traffic-related noise impacts to the surrounding environment would be less than significant.</p> <p>With respect to stationary sources, all related projects would be required to comply with the regulations under Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dB. Thus, with conformance with LAMC Section 112.02 and UBC No. 35-1, 1979 edition, the cumulative noise impact associated with stationary sources would be less than significant.</p>		
<b>J. POPULATION AND HOUSING</b>		
<p><i>Population</i> Implementation of the proposed project would remove the existing 7,117 square foot Wells Fargo Bank and surface parking lot and construct a 175,057 square foot mixed-use development. The proposed project would include construction of 158 residential unit, 21-story tower and four townhomes. As previously presented, the CPA had a total population of approximately 313,445 persons in 2006 with a total of 123,566 housing units. The proposed project would include a total of 162 (158 dwelling units in tower + 4 townhomes) residential units. Based on an average</p>	No Mitigation Measures required	Less than significant

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>household size of 2.5 persons per household, approximately 405 people would occupy the 162 residential units. The direct physical impacts resulting from this increase in population and housing are analyzed under each issue area throughout this Draft EIR (see Sections IV.A through IV.M).</p> <p>The increase in residential population resulting from implementation of the proposed project (405 persons) is considered minimal, as it would represent approximately 1.7 percent of the anticipated population growth of 23,699 persons in Wilshire from 2006 to 2010. This would not be considered a substantial increase, because the addition of 405 persons would be within the population projection in the CPA. As a result, the development of the proposed project would not directly induce substantial residential population growth not planned or anticipated, and impacts relating to residential population would be less than significant.</p>		
<p><i>Housing</i></p> <p>The proposed project would add 162 housing units to the City’s housing inventory. The CPA does not contain a housing unit forecast but states an annual growth rate in housing units of 0.44 percent. Based on this rate, the projected housing unit growth between 2000 and 2010 is approximately 5,642 units, representing an increase of approximately 4.5 percent. The proposed project’s residential component would provide additional units to the City’s and Community Plan’s housing stock. However, this would not be a substantial increase, because the addition of 162 housing units to the Community’s housing inventory would represent approximately 2.8 percent of the anticipated new housing units between 2006 and 2010 would not exceed the projected growth rates for the Community. As a result, the development of the proposed project would not directly induce substantial housing growth, and impacts relating to housing would be less than significant.</p>	<p>No Mitigation Measures required</p>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p><b>Construction-Related Population and Housing Growth</b> Construction of the proposed project would result in increased employment opportunities during the project’s construction period. However, the employment opportunities provided by the construction of the proposed project would not likely result in household relocation by construction workers to the vicinity of the project site. Additionally, construction workers would likely be drawn from the construction employment labor force already resident in the surrounding communities. It is not likely that construction workers would relocate their place of residence as a consequence of working on the proposed project. Since construction workers would not relocate to the area, such workers would not cause an increase population or housing. Overall, the construction of the proposed project would have a less than significant direct impact on housing and population growth.</p>	No Mitigation Measures required	Less than significant
<p><b>Indirect Growth</b> The proposed project would include 6,850 square feet of retail space. The proposed project would generate job opportunities for approximately 15 employees. However, with the removal of the Wells Fargo Bank (approximately 16 employees), there will be a net loss of 1 employee. It is likely that at least some of these jobs would be filled by people already living in the area. However, the following analysis conservatively assumes that all of the jobs in the proposed project will be filled by people who currently live outside the area and who will move into the area to be closer to their job. The net loss of 1 employee based on the proposed project would not have an impact on housing in the CPA. The current Wells Fargo Bank supports 16 employees who live or commute in the Wilshire CPA. The new retail proposed would only support approximately 15 employees. Based on this net loss, it is assumed that there would be no indirect growth from employees in the CPA. Therefore, impacts would be less than significant. The proposed project would not require the extension of roadways and other infrastructure (e.g., water facilities, sewer facilities, electricity transmission lines, natural gas lines, etc.) into undeveloped areas (see Sections IV.K Public Services, IV.L Transportation and Traffic, and IV.M Utilities and Service Systems). Furthermore, the existing infrastructure in the project area would serve the</p>	No Mitigation Measures required	Less than significant

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

<b>Environmental Impact</b>	<b>Mitigation Measures Project Enhancements</b>	<b>Level of Significance After Mitigation</b>
<p>proposed project. As a result, the development of the proposed project would not indirectly induce substantial growth as a result of the extension of infrastructure, and the associated impact would be less than significant.</p>		
<p><b><i>Housing or Population Displacement</i></b>                      The project site is currently developed but does not contain any housing or residential population. The implementation of the proposed project would not displace any housing or people, necessitating the construction of replacement housing elsewhere. Therefore, no impacts with respect to housing or population displacement would occur.</p>	No Mitigation Measures required	Less than significant
<p><b>Cumulative Impacts</b>                      The commercial land uses that would be developed with implementation of the proposed project in combination with the related projects would concurrently increase the number of employees and their associated households in the area. The commercial related projects in combination with the proposed project would potentially yield a combined employee increase of approximately 2,661 employees. Based on an estimate of one new housing unit per new employee, the cumulative employment would indirectly result in demand for approximately 2,661 new residences within the related projects area. However, this would be a conservative estimate of new permanent residents and households, as new employment positions are often filled from the existing community and extended City population and typically do not result in relocation into the area to be closer to the place or work. Based on a Citywide population increase between 2000 and 2010 of approximately 395,305 individuals, the development of the proposed project would not indirectly induce substantial cumulative population and housing growth as a result of new employment opportunities, and the associated cumulative impact would be less than significant.                      The housing units that would be developed with the implementation of the proposed project in combination with the related projects would concurrently increase the resident population in the area. The dwelling units that would be</p>	No Mitigation Measures required	Less than significant

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>developed with the related projects in combination with the proposed project’s dwelling units would potentially yield a combined population increase of approximately 7,329 persons. The proposed project’s incremental contribution to cumulative population and housing growth would not be considerable, and cumulative impacts associated with population and housing would be less than significant.</p>		
<b>K. PUBLIC SERVICES</b>		
<b>FIRE SERVICES</b>		
<p><b>Construction</b> Construction of the proposed project would increase the potential for accidental on-site fires from such sources as the operation of mechanical equipment, use of flammable construction materials, and from carelessly discarded cigarettes. In most cases, the implementation of “good housekeeping” procedures by the construction contractors and the work crews would minimize these hazards. Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and by partial lane closures during street improvements and utility installations. These impacts, while potentially adverse, are considered to be less than significant. Project construction would not be expected to tax fire fighting and emergency services to the extent that there would be a need for new or expanded fire facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD, the construction of which could cause significant environmental impacts. Therefore, construction-related impacts to fire protection services would be less than significant.</p>	<p>Although the proposed project would not have a significant impact on fire protection services, the following mitigation measures are recommended to further reduce the proposed project’s less than significant impact on fire protection services:</p> <ul style="list-style-type: none"> <li>K.1-1 Prior to recordation of a final map or the approval of a building permit, the applicant shall submit the plot plan for review and approval by the Fire Department.</li> <li>K.1-2 No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant.</li> <li>K.1-3 Access for Fire Department apparatus and personnel to and into all structures, including the parking facility, shall be provided.</li> <li>K.1-4 In accordance with LAMC Section</li> </ul>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
	<p>57.09.07, the project applicant shall equip the proposed structure with automatic sprinkler systems.</p> <p>K.1-5 The proposed project shall comply with all applicable State and local codes and ordinances, and guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan for the City of Los Angeles C.P.C. 19708.</p>	
<p><b>Operation</b> The proposed project would introduce new residents to the project site. Thus, an increase in the demand for fire protection services is anticipated. However, the LAFD has indicated that staffing and resources are adequate to meet the project area’s proposed demand for fire and emergency services. The project site’s proximity to two well-equipped fire stations, fire protection response would be considered adequate with respect to response distance and impacts would be less than significant. The proposed project would not involve any other activities during its operational phase that could impede public access or travel upon public rights-of-way or would interfere with an adopted emergency response or evacuation plan. Water pressure and availability in the project are expected to be sufficient to meet the existing LAFD’s fire flow requirements. Based on the existing staffing levels, equipment, facilities, and response distance from existing stations, it is expected that the LAFD could accommodate the proposed project’s demand for fire protection service. Therefore, the proposed project would not necessitate the construction or expansion of a fire station to maintain acceptable service ratios, response times, or other performance objectives of the LAFD, the construction of which could cause significant environmental impacts.</p>	<p>No Mitigation Measures required</p>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p><b>Cumulative Impacts</b></p> <p>The proposed project, in combination with the 53 related projects would increase the demand for fire protection services in the project area. Specifically, there would be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (i.e., property taxes, government funding), to which the proposed project and related projects would contribute. Similar to the proposed project, each of the related projects would be individually subject to LAFD review and would be required to comply with all applicable construction-related and operational fire safety requirements of the LAFD and the City of Los Angeles in order to adequately mitigate fire protection impacts. If any of the related projects would create demands on fire protection staffing, equipment, or facilities such that a new station would be required, potential environmental impacts would be addressed in conjunction with the environmental review for that project. At present there are no need or specific plans to build a new fire station, the construction of which could cause significant environmental impacts. Therefore, the proposed project would not have a cumulatively considerable incremental effect on fire protection services and the proposed project and related projects' cumulative impact would be less than significant.</p>	<p>No Mitigation Measures required</p>	<p>Less than significant</p>
<p><b>POLICE SERVICES</b></p>		
<p><b>Construction</b></p> <p>The proposed project's impacts on fire protection services would be less than significant without mitigation. The implementation of the recommended Mitigation Measures K.1-1 through K.1-4 would further reduce the proposed project and cumulative projects' less than significant impacts. Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Consequently, developers typically take precautions to prevent trespassing through construction sites. As such, temporary fencing will be installed around the construction site to keep out the curious. Deployment of roving security guards is also an effective strategy in preventing problems from developing. When</p>	<p><b>Construction</b></p> <p>Although the proposed project would not have a significant construction-related impact on police protection services, the following mitigation measure is recommended to further reduce the proposed project's less than significant construction-related police protection impacts.</p> <p align="center">K.2-1 During construction activities, the project developer shall ensure that all</p>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>such common sense precautions are taken, there is less need for local law enforcement at the construction site. Therefore, construction-related impacts to police protection services would be less than significant.</p>	<p>onsite areas of active development, material and equipment storage, and vehicle staging, that are adjacent to existing public roadways, be secured to prevent trespass.</p>	
<p><b>Operation</b> The proposed project would introduce new residents to the project site. In addition, the commercial component of the proposed project is expected to generate a net decrease of 2 employees. Thus, an increase in the demand for police protection services is anticipated. While there is not a directly proportional relationship between increases in land use activity and increases in demand for police protection services, the number of request for assistance calls for police response to retail burglaries, vehicle burglaries, damage to vehicles, traffic-related incidents, and crimes against persons would be anticipated to increase with the increase in onsite activity and increased traffic on adjacent streets and arterials. However, such calls are typical of problems experienced in existing commercial and residential neighborhoods in the project area and do not represent unique law enforcement issues specific to the proposed project. The LAPD has stated that the Wilshire Community Police Station is staffed and equipped to provide full service to the Wilshire area, which includes the project site, and that the proposed project would not result in the need for construction or expansion of police stations or other police protection facilities. As such, no new or expanded police stations would be needed, the construction of which could cause significant environmental impacts, as a result of the proposed project. Therefore, there would be no operational impacts to police protection services.</p>	<p><b>Operation</b> While the proposed project would not have a significant impact on police protection services following its buildout, the following mitigation measure is recommended to ensure that the LAPD’s recommendations for the proposed project are addressed:</p> <p>K.2-2 Prior to site plan approval, the building and layout design of the proposed project shall include crime prevention features, such as nighttime security lighting, building security systems, and secure parking facilities.</p> <p>K.2-3 Prior to the recordation of a final map or the approval of a building permit, the project developer shall submit a plot plan for the proposed development to the LAPD’s Crime Prevention Section for review and comment. Security features subsequently recommended by the LAPD shall be implemented, to the extent feasible.</p>	<p>Less than significant</p>
<p><b>Cumulative Impacts</b></p>	<p>No mitigation measures required</p>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>The geographic context for cumulative analysis pertaining to police protection services entails the Wilshire Community Police Station service area. Out of the 53 related projects identified in the related projects list only 26 are located within the Wilshire Community Police Station service area. The proposed project, in combination with the related projects, would increase the demand for police protection services in the project area. Any new or expanded police station would be funded via existing mechanisms (i.e., sales taxes, government funding) to which the proposed project and related projects would contribute. Furthermore, similar to the proposed project, each of the related projects would be individually subject to LAPD review, and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. As the proposed project would not incrementally contribute to the cumulative demand for police protection services therefore not cumulatively considerable and impacts would be less than significant.</p>		
<b>SCHOOL SERVICES</b>		
<p>The proposed residential and retail uses are estimated to generate 28 elementary students, 13 middle school students, and 13 high school students for a total of 54 students. While it is likely that some of the students generated by the proposed project would already reside in areas served by LAUSD and would already be enrolled in LAUSD schools, for a conservative analysis, it is assumed that all students generated by the proposed project would be new to LAUSD. All three public schools serving the project site would have adequate capacity to accommodate the students generated by the proposed project. Therefore impacts would be less than significant with reference to Hancock Park Elementary School, Burroughs Middle School, and Fairfax High School.</p>	<p>K.3-1 The applicant shall pay all applicable mandatory school impact fees to LAUSD.</p>	<p>Less than significant</p>
<p><b>Cumulative Impacts</b></p> <p>Out of 53 related projects, only 36 related projects would be expected to generate students that would be served by LAUSD. The related projects would generate</p>	<p>No Mitigation Measures required</p>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>approximately 519 elementary school students, 249 middle school students, and 251 high school students, for a total of 1,019 students. Hancock Park Elementary School and Burroughs Middle School would not have adequate capacity accommodate the cumulative student generation. However Fairfax High School would be able to accommodate the cumulative student generation. Therefore, new or expanded elementary and middle schools may be needed, which would result in a potentially significant cumulative impact. However, several of the projects (related projects nos. 18, 22, and 36) involve the addition of school space. As such, these projects will not involve the generation of students, but will instead increase available school space. Additionally, as for the proposed project, the applicants of the related commercial and residential projects would be expected to pay required developer school fees to the LAUSD (pursuant to SB 50) to help reduce any impacts they may have on school services. The provisions of SB 50, are deemed to provide full and complete mitigation of school facilities impacts. The payment of these fees by the related projects would be mandatory and would ensure that cumulative impacts upon school services remain less than significant. Therefore, the proposed project’s impact on schools would not be cumulatively considerable and cumulative impacts would be less than significant.</p>		
<b>PARKS &amp; RECREATION</b>		
<p>Typically, residential developments have the greatest potential to result in impacts to parks and recreation facilities. This is a result of residential developments generating a permanent increase in the population. In general, employees are not likely to have the time to use parks and recreational facilities during working hours, and are more likely to use parks and recreational facilities near their homes during non-work hours. The proposed project would result in a net increase of approximately 405 permanent residents to the project site.</p> <p>Though the proposed project would provide approximately 15,575 square feet of open space, the net project population increase would generate additional demand for recreation and park services when the project is complete. Applying the long range planning goal in the Public Recreation Plan of four acres of parkland per</p>	<p>K.4-1 The applicant shall pay the required fees to the Department of Building and Safety in accordance to the Dwelling Unit Construction Tax required by the Los Angeles Municipal Code Section 21.10.3(b).</p> <p>K.4-2 The applicant shall fulfill the obligations of the Quimby Act through parkland dedication or payment of fees</p>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>1,000 residents, the additional residents created by the project would demand an equivalent of 1.37 acres of recreational space and uses.</p> <p>The parkland to resident ratio for both the Wilshire CPA and the City of Los Angeles falls below the City’s preferred standard of four acres per 1,000 residents at 0.23 and 0.76 acres per 1,000 residents, respectively. The Wilshire CPA is completely urbanized and built out with commercial and residential uses.</p> <p>As identified above, the net increase in population for the project site would result in a demand equivalent to approximately 1.6 acres of recreational facilities. The proposed project would include various indoor and outdoor recreational amenities, such as BBQ area, fitness center, sky lounge, rooftop garden, swimming pool that totals 15,475 square feet plus an additional 10,025 square feet of private open space. The project would be required to pay fees to the city of Los Angeles Department of Building and Safety per dwelling unit in accordance with the Dwelling Unit Construction Tax Requirements per the LAMC Section 21.10.3.(b) and under the Quimby Act, the developer would be required to dedicate land or pay Quimby fees to reduce impacts to parks and recreational facilities and impacts would be less than significant.</p>	<p>in lieu of parkland dedication.</p>	

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p><b>Cumulative Impacts</b></p> <p>Of the 53 related projects, 14 (nos. 28, 29, 35, 38, 41-43, 45, 47, 49-53) in the city of Los Angeles would generate residents. In general, the other related projects would generate employees and/or students, who would not be expected to use local park or recreational facilities to a great extent, as they typically would not have long periods of time during their work or school days to visit parks and recreational facilities, and would be more likely to patronize park and recreational facilities near their homes during non-work or non-school hours. The proposed project and the residential related projects would generate a cumulative population increase of 7,329 residents. This would result in a demand for approximately 29 acres of parkland and recreational facilities. The 14 residential related projects would be required to pay Quimby fees or other applicable parks and recreation fees and /or incorporate park and recreation amenities onsite. With mandatory payment of Quimby fees or other applicable fees, cumulative parks and recreation impacts would be less than significant.</p>	<p>No Mitigation Measures required</p>	<p>Less than significant impact</p>
<b>LIBRARY SERVICES</b>		
<p>Development of the proposed project would increase the demand for library services in the area, with the addition of 405 new permanent residents. The Fairfax Branch Library currently meets the demands of the surrounding community. However, the branch does not meet the new current branch size criteria that were approved February 8, 2007. This specifies that a library branch serving a population over 45,000 people (as Fairfax does) should be 14,500 square feet. Nevertheless, this library would be affected by the development of the proposed project, as it may result in additional demand on the busy branch and thus impacts may be potentially significant with reference to library facilities. The project applicant shall pay a mitigation fee of \$200 per capita based on the projected population of the development to the Los Angeles Public Library to offset the impact of additional library facility demand in the project area.</p>	<p>K.5-1 The Los Angeles Public Library recommends a mitigation fee of \$200 per capita based upon the projected population of the development. The funds will be used for staff, books, computers, and other library materials. It is recommended that mitigation fees be paid by the developer.</p>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p><b>Cumulative Impacts</b></p> <p>The proposed project and the residential related projects would generate a cumulative population increase of 7,329 residents. This would result in a demand for approximately 3,634 square feet of library space. The Fairfax Branch Library currently meets the demands of the surrounding community, but this library is not likely to meet the cumulative demand of the proposed project in combination with the related projects. The cumulative demand of the proposed project and the related projects may therefore present a potentially significant impact. However, with payment of the library mitigation fees, the potentially significant cumulative impacts will be reduced to less than significant. As such, the proposed project in combination with the related projects would have a less than significant impact to library services.</p>	<p>No Mitigation Measures required</p>	<p>Less than significant</p>
<p><b>L. TRAFFIC AND TRANSPORTATION</b></p>		
<p><b>Operational Impacts</b></p> <p><i>Trip Generation</i></p> <p>Once the existing site development has been removed and the new development is completed and occupied, the proposed project is expected to result in an increase in site-related trips of approximately 1,214 net new daily trips, including 103 net new AM peak hour trips (29 inbound, 74 outbound), and 34 net PM peak hour trips (32 inbound, 2 outbound). These values represent the amount of net traffic that is expected to be added to the area roadway network and study intersections as a result of the project.</p> <p>For this study, it was conservatively assumed that the intersections of 6<sup>th</sup> Street and Crescent Heights Boulevard (intersection number 3), Wilshire Boulevard and La Jolla Avenue (intersection number 6), Wilshire Boulevard and Fairfax Avenue (intersection number 7), and Wilshire Boulevard and Ogden Drive (intersection number 8) would be the locations at which LADOT considers the pass by trips</p>	<p>The results of the analyses indicate that the proposed project could potentially result in significant traffic impacts at three of the 11 study intersections during one or both peak hours; at 6<sup>th</sup> Street and Fairfax Avenue (PM peak hour), at Wilshire Boulevard and Crescent Heights Boulevard/McCarthy Vista (AM peak hour), and at Wilshire Boulevard and Fairfax Avenue (both peak hours). Therefore, a review of the existing intersection and roadway geometries and operations was undertaken to identify feasible roadway system improvements to mitigate these potential impacts. The area roadway system is currently substantially improved, and there are few available rights-of-way or unimproved roadway segments with which to construct any meaningful new roadway or intersection capacities. Additionally,</p>	<p>The effectiveness of the recommended traffic signal improvement at 6<sup>th</sup> Street and Fairfax Avenue will be ultimately evaluated by LADOT staff in their review of the feasibility of this measure, which is consistent with the Mayor’s directive to install new left-turn phasing at key intersections throughout the City, in order to address ongoing and increasing traffic congestion.</p> <p>However, in order to present the</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>discount inappropriate. As such, the net project trips at those intersections would be somewhat higher than at the remaining seven study intersections, with a total project traffic addition of approximately 1,655 net new daily trips, including approximately 133 net AM peak hour trips (48 inbound, 85 outbound), and 33 net PM peak hour trips (31 inbound, 2 outbound). This methodology assures a more conservative analysis of potential project traffic impacts, particularly at those locations closest to the site.</p> <p><i>Project Roadway Improvements</i></p> <p>The LAMC requires that all development projects within the City improve the roadways and other transportation facilities adjacent to their respective sites to the rights-of-way and street widths appropriate to each street’s designation as noted in the Transportation Element of the City of Los Angeles General Plan, and per LADOT and City of Los Angeles Bureau of Engineering standards. The proposed project is located at the northeast corner of Wilshire Boulevard and Crescent Heights Boulevard, and therefore, the project will be responsible for improving its frontages of both facilities to meet the necessary requirements.</p> <p>Major Highways such as Wilshire Boulevard are required to provide a typical half roadway width (centerline to back of curb) of 40 feet within a 52-foot half right-of-way (centerline to property line), or a total 80-foot roadway within a total 104-foot right-of-way. Adjacent to the project site, Wilshire Boulevard is currently dedicated to a total width of approximately 126 feet, and improved to a total roadway of 80 feet, including a 63-foot half right-of-way width, and an approximately 40-foot half street along the north side project frontage. However, the existing 63-foot half right-of-way is the result of an historical, approximately 13-foot “prescriptive easement” from the 1930’s. Further, since the roadway currently exceeds the mandated 40-foot half-roadway width for Major Highway, no roadway widening will be required, nor will corner cuts at Crescent Heights, Wilshire Boulevard or Orange Street be required.</p> <p>Secondary Highways such as Crescent Heights Boulevard are required to provide a</p>	<p>the area traffic signal network has already been upgraded with both the ATSAC and second-generation ATCS signal coordination systems, and no additional signal operation enhancements are available. Therefore, potential mitigation measures for this project are relegated to operational improvements based on the forecast traffic demand patterns, such as converting the operations of existing lanes to better accommodate future travel patterns, or the addition of short turn lanes to improve “through” traffic movements at the intersections, where feasible. The specific measures recommended to mitigate the potential impacts of the proposed project are described below:</p> <p><u>6<sup>th</sup> Street and Fairfax Avenue</u></p> <p>No feasible physical improvements are available to mitigate the project’s impacts at this location. However, the intersection currently exhibits high left-turn volumes in the southbound direction during both peak hours and due to these heavy volumes, left-turn queues sometime build and encroach into the through lanes, creating further delays for these movements. A northbound left-turn phase was also proposed, but was rejected by LADOT due to conflicts with ongoing neighborhood traffic management measures in the area. As such, the following mitigation measure is recommended:</p> <p>L-1 The project applicant shall contribute to the installation of southbound left-turn phasing</p>	<p>most conservative assessment of the potential effectiveness of the proposed left-turn mitigation measure, the project’s impacts at this location is considered to remain significant and unavoidable. Similarly, as no feasible mitigation is available for the project’s potential significant impacts at Wilshire Boulevard and Crescent Heights Boulevard/McCarthy Vista, or at Wilshire Boulevard and Fairfax Avenue, the impacts at these two locations would also remain significant and unavoidable. Finally, although the project will prepare and implement appropriate trip-reduction strategies and programs to the satisfaction of LADOT, the effects of the TDM program are not considered to fully mitigate any of the three significant impacts identified above. However, it is noted in LADOT’s traffic impact assessment letter, dated May 5, 2009, that the project’s traffic impacts were analyzed without benefit of potential TDM-related trip reductions,</p>

**Table I-1 (Continued)**  
**Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>total dedication of 90 feet, improved with a 70-foot wide roadway, or a 35-foot wide half roadway within a 45-foot half right-of-way. However, in 2002, the City took action to change the designation of Crescent Heights Boulevard between Rosewood Avenue (two blocks south of Melrose Avenue) and Wilshire Boulevard to Modified Secondary Highway standards, in order to limit future widening and the associated increases in traffic the additional capacities would create. This action also limited taking of additional street dedication and/or improvement-related rights-of-way along Crescent Heights Boulevard through the project vicinity to the “commercial” portions of the street, such as that located along the project frontage from Wilshire Boulevard to about 130 feet south of Orange Street (a distance of about 190 feet); the “residential” portions of the street are intended to remain as currently improved.</p> <p>Along the project frontage of the “residential” segment of Crescent Heights Boulevard, the roadway is currently dedicated to a total right-of-way width of approximately 70 feet, and improved to a total roadway width of 46 feet. The dedications and widenings are symmetrical about the centerline of the roadway, providing a half right-of-way of 35 feet, and a half roadway width of 23 feet. However, as described above, the City’s action regarding the modification of “residential” segments of Crescent Heights Boulevard eliminates the requirement for additional right-of-way dedications and widenings to this portion of the street. Through the southern, “commercial” portion of Crescent Heights Boulevard, north of Wilshire Boulevard, the roadway exhibits a total right-of-way of approximately 80 feet, including a 45-foot half right-of-way along the project frontage. However, the roadway within this section continues to exhibit a total 46-foot width, including a 23-foot half street along the project frontage, and as such, the LAMC requires that the project provide a 12-foot widening along this portion of its Crescent Heights Boulevard frontage to complete the required 35-foot half roadway.</p> <p>Although the required roadway widening would create adequate additional roadway width along the project’s commercial frontage to provide a new northbound deceleration into the project driveway, there would be inadequate distance to</p>	<p>at this intersection (protected phase during the AM and PM peak hours, permissive during off-peak periods) to provide enhanced signal operations and smoother traffic flow at this location.</p> <p><u>Wilshire Boulevard and Crescent Heights Boulevard/McCarthy Vista</u></p> <p>No feasible physical improvements were identified to mitigate the project’s impacts at this location. Although the project applicant proposed the installation of southbound left-turn phasing at this intersection, LADOT determined that such a measure would unacceptably increase vehicle and pedestrian delays due to longer signal cycle lengths.</p> <p><u>Wilshire Boulevard and Fairfax Avenue</u></p> <p>No feasible physical improvements are available to mitigate the project’s impacts at this location. Although the project applicant proposed to widen the east side of Fairfax Avenue north of Wilshire Boulevard by two feet (within the existing right-of-way) and re-stripe the southbound approach of the intersection to install a new right-turn only lane, LADOT noted that, subsequent to the preparation of the project traffic study, the proposed mitigation had already been assigned to another project in the area, and was currently under construction.</p> <p><u>Transportation Demand Management (TDM)</u></p>	<p>and as such, LADOT identifies that the project’s traffic impacts described in the traffic study are over-stated.</p> <p>Despite the three intersection impacts described previously, the traffic analyses indicate that no significant impacts are anticipated at any of the other eight study intersections during either of the peak hours. Additionally, the project is not anticipated to produce significant impacts to any of the Congestion Management Program (CMP) arterial roadways, intersections, or freeway segments in the vicinity. Finally, no significant impacts are anticipated to occur on any of the residential streets surrounding the project site.</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>provide a feasible acceleration lane for northbound traffic exiting the Crescent Heights Boulevard driveway. Additionally, since no future dedications, and therefore no meaningful roadway improvements, will occur within the foreseeable future along the residential-fronted portions of Crescent Heights Boulevard north of the project site, the requirement to widen along the project frontage would actually present a potential hazard due to the necessary “narrowing” of the northbound roadway immediately north of the project’s driveway. Therefore, it is recommended that no widening of Crescent Heights Boulevard be required at this time.</p> <p>Finally, Orange Street is classified as a Local Street, which currently exhibits a design standard of a 60-foot total right-of-way improved with a 40-foot roadway (a 20-foot half roadway within a 30-foot half right-of-way). The segment of Orange Street fronting the project site currently exhibits a 55-foot total right-of-way dedication and a 35-foot roadway improvement, also symmetrical along the roadway centerline. Therefore, the project frontage of Orange Street will require a 2.5-foot dedication and a 2.5-foot widening in order to bring it into compliance with current City requirements. However, in order to minimize additional traffic along Orange Street, it is recommended that only the roadway dedication occur at this time.</p> <p>While the improvements described above will provide for wider sidewalks along the project’s Wilshire Boulevard frontage (the Crescent Heights Boulevard parkway/sidewalk is already established at the recommended 12-foot width), no meaningful traffic flow or intersection or roadway capacity enhancements are expected. Even if Crescent Heights Boulevard dedications and widenings are required, they will only provide receiving lanes at the intersection of Wilshire Boulevard and Crescent Heights Boulevard, not additional approach lanes which would increase intersection capacity. Therefore, the operations and capacities of the site adjacent roadways, and the intersection of Wilshire Boulevard and Crescent Heights Boulevard, are expected to remain unchanged from the current conditions.</p>	<p><u>Program</u></p> <p>In order to reduce trips generated by the project, the project shall implement a Transportation Demand Management Program for the project.</p> <p>L-2 The project applicant shall work with LADOT to develop a TDM plan that includes trip reduction goals aimed at reducing the project’s traffic impacts. A preliminary TDM plan shall be prepared and provided for LADOT review prior to issuance of the first building permit for the project, and a final TDM program shall be approved by LADOT prior to issuance of any temporary or final certificate of occupancy for the project.</p>	

**Table I-1 (Continued)**  
**Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p><b><i>Future Traffic Conditions</i></b>                      Using the impact evaluation criteria described above (under Thresholds of Significance), the incremental project traffic impacts were evaluated. Based on the significance thresholds mandated by LADOT, the project is anticipated to produce a significant impact at three of the study intersections during one or both peak hours: Fairfax Avenue and 6<sup>th</sup> Street (PM peak hour), Crescent Heights Boulevard/McCarthy Vista and Wilshire Boulevard (AM peak hour), and Fairfax Avenue and Wilshire Boulevard (both peak hours). None of the remaining intersections are anticipated to be significantly impacted by the proposed project's traffic additions, and in fact, due to the slight reduction in outbound site-related trips during the PM peak hour, operations at several of the study intersections will remain either unchanged or will slightly improve from the "Without Project" conditions during this time period.</p>	<p>See Mitigation Measures L-1 and L-2 above</p>	<p>See discussion above</p>
<p><b><i>Parking and Access</i></b>                      The project proposes to provide a total of 432 spaces, including the required 316 apartment resident spaces and 79 apartment guest spaces, eight townhome resident spaces, two townhome guest spaces, plus a total of 27 commercial spaces. Therefore, the project will conform to all applicable parking requirements, and no significant off site parking impacts or "overflow" parking into any of the adjoining residential neighborhoods is anticipated.</p>	<p>No Mitigation Measures required</p>	<p>Less than significant</p>
<p><b><i>Project Impacts on Regional Transportation System</i></b>   <b><i>CMP Monitoring Intersection Impacts</i></b>                      The current CMP (2004) identifies 10 arterial monitoring intersections within an approximately three-mile radius of the project site. All but two of these CMP monitoring intersection locations (Wilshire Boulevard and La Brea Avenue, and Wilshire Boulevard and La Cienega Boulevard) are outside the immediate project study area, and are expected to be beyond the range of identifiable project traffic impacts.</p>	<p>No Mitigation Measures required</p>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>The CMP requires that detailed analyses be conducted for any of these locations where the proposed project is anticipated to add 50 or more total trips during either the AM or PM peak hours. A review of the net project traffic additions in the project vicinity indicates that net new project traffic at the site itself are expected to be substantially below these thresholds during the PM peak hour, with the project, resulting in a net increase of only 34 trips, including a nominal increase of 32 net new inbound trips, and two outbound trips. During the AM peak hour, however, the project is expected to result in a net increase of approximately 103 trips, including 29 net new inbound and 74 net new outbound trips. However, a review of the expected AM peak hour project traffic assignments indicates that net project trips through intersections outside the immediate study area will be well below the 50-trip threshold, and total net project traffic additions to intersections beyond the 11 study intersections are not expected to exceed 18 total trips (Wilshire Boulevard, east of Ogden Drive). Additionally, project traffic will disperse through the area roadway network outside the study area, and total project volume additions to any of the CMP locations identified above will be further reduced from these already low values. Based on these conditions, the project will not meet the CMP criteria for detailed analyses at any of the nearest CMP arterial monitoring intersections, and potential project impacts at more distant CMP locations will also be at less than significant levels. Therefore, no further CMP monitoring intersection analysis is warranted.</p> <p><i>CMP Freeway Segment Impacts</i></p> <p>An examination was also made of the potential for project-related freeway impacts within the project study area. As identified previously, the project will generate fewer than 150 directional vehicles per hour during both the AM and PM peak hours, with a maximum of 74 net inbound trips during the AM and 32 net outbound trips during the PM peak hour. Further, the project site is not located in an area immediately or conveniently served by any of the area freeways, and as such, only a nominal amount (maximum of 10 percent) of the project's trips are anticipated in any direction of any segment of the closest freeways, the Santa Monica Freeway (I-10) approximately two miles to the south, or the Hollywood Freeway (US-101)</p>		

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
approximately five miles to the northeast. As a result, directional peak hour project trip additions to either of these facilities would be expected to represent a maximum of less than 10 vehicles during any peak hour, well below the 150-trip threshold requiring any detailed analyses. These nominal project-related freeway traffic additions will not produce any measurable effects on any of the regional transportation facilities, and no further analysis is warranted.		
<b>Cumulative Impacts</b>  The analysis of traffic impacts of the proposed project considers the effects of future growth in traffic in the region through consideration of traffic generated by the 53 related projects and application of the ambient growth factor. Impacts of the proposed project, in conjunction with the related projects, are shown in the “With Project” column of the same table. As such, the proposed project’s incremental effect with respect to traffic would not be cumulatively significant.	No Mitigation Measures required	Less than significant
<b>K. UTILITIES</b>		
<b>WASTEWATER</b>		
The project site is not served by a private onsite wastewater treatment system, but instead conveys wastewater via municipal sewage infrastructure to the local treatment plant. Treatment plants in the City of Los Angeles are subject to the State’s wastewater treatment requirements. Wastewater from the project site would therefore be treated according to the wastewater treatment requirements by the LARWQCB. Therefore, project impacts related to exceeding wastewater treatment requirements would be less than significant. The proposed project is estimated to generate a net total of 18,259 gpd of wastewater. The HTP has sufficient remaining capacity to provide treatment for the wastewater generated as a result of the proposed project. The proposed project would generate approximately 0.02% of the remaining capacity of the HTP. The proposed project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. Therefore, the proposed project’s impact on sewer systems would be less than significant.	No mitigation measures required	Less than significant

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p><b>Cumulative Impacts</b></p> <p>To analyze cumulative impacts, a list of related projects was compiled by the City of Los Angeles consisting of approved, proposed, or potential projects in the project vicinity. The geographic context for this cumulative analysis entails the LABS service area. As the LABS service area encompasses all of metropolitan Los Angeles, all of the identified related projects are included in the following cumulative impacts discussion. Implementation of the proposed project in combination with the 53 related projects would increase the generation of wastewater in the project area. The estimated wastewater generation by the related projects would be 553,024 gpd. The cumulative wastewater generation of the related projects in combination with the proposed project would be approximately 571,283 gpd. However, cumulative impacts are expected to be less than significant for the reasons discussed below.</p>	<p>No mitigation measures required</p>	<p>Less than significant</p>
<p><b>WATER SUPPLY</b></p>		
<p>To analyze cumulative impacts, a list of related projects was compiled by the City of Los Angeles consisting of approved, proposed, or potential projects in the project vicinity. The geographic context for this cumulative analysis entails the LABS service area. As the LABS service area encompasses all of metropolitan Los Angeles, all of the identified related projects are included in the following cumulative impacts discussion. Implementation of the proposed project in combination with the 53 related projects would increase the generation of wastewater in the project area. The estimated wastewater generation by the related projects would be 553,024 gpd. The cumulative wastewater generation of the related projects in combination with the proposed project would be approximately 571,283 gpd. However, cumulative impacts are expected to be less than significant for the reasons discussed below. The proposed project would result in the demand for 21,911 gallons per day of water. Due to statewide drought conditions in the mid-1970s and late 1980s, there is a need for water conservation in periods of water shortage. The LADWP recommends that water should be conserved at all times,</p>	<p>Although the proposed project would have a less than significant impact on water supply, the following mitigation measures are recommended to reduce further the proposed project’s impacts:</p> <p>M.2.-1 The project developer shall ensure that the landscape irrigation system be designed, installed, and tested to provide uniform irrigation coverage. Sprinkler head patterns shall be adjusted to minimize over spray onto walkways and streets.</p> <p>M.2.-2 The project developer shall install either a “smart sprinkler” system to provide irrigation for the landscaped areas or, at a</p>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>because efficient use of water allows increased water for use in dry years and makes water available for beneficial environmental uses. As such, the proposed project would install low-flush showerheads, toilets, and urinals. The LADWP has stated that water requirements for any project that is consistent with the City’s General Plan have been taken into account in the planned growth in water demand and that sufficient supplies are available to accommodate the proposed project. Further, the LADWP has indicated in its Urban Water Management Plan that it will provide an adequate water supply to meet current and future growth until at least 2020. Therefore, impacts to water supply would be less than significant.</p>	<p>minimum, set automatic irrigation timers to water landscaping during early morning or late evening hours to reduce water losses from evaporation. Irrigation run times for all zones shall be adjusted seasonally, reducing water times and frequency in the cooler months (fall, winter, spring). Sprinkler run times shall be adjusted to avoid water runoff, especially when irrigating sloped property.</p> <p>M.2.-3 The project developer shall select and use drought tolerant, low water consuming plant varieties to reduce irrigation water consumption.</p> <p>M.2.-4 The project developer shall install ultra-low flush water toilets and water saving showerheads in new construction. Low-flow faucet aerators shall be installed on all sink faucets.</p> <p>M.2.-5 The availability of recycled water shall be investigated as a source to irrigate large landscaped areas.</p> <p>M.2.-6 Significant opportunities for water savings exist in air conditioning systems that utilize evaporative cooling (i.e., employ cooling towers). The applicant shall contact LADWP for guidance and recommendations regarding appropriate</p>	

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
	water savings solutions/measures for the project's air conditioning system.	
<p><b>Cumulative Impacts</b></p> <p>Implementation of the proposed project in combination with the 53 related projects identified within the LADWP service area would increase water demand.</p> <p>The related projects in combination with the proposed project would be approximately 686,499 gallons per day. The 53 related projects would be provided water supply service by LADWP. As previously discussed, the design capacity of the LAFP is 600 mgd, and the LAFP's current average water flow is 475 mgd. Therefore, the LAFP has a remaining capacity of approximately 125 mgd. The cumulative total for related projects and the proposed project represents 0.5 percent of the total remaining daily capacity. Further, the other related projects would not require major water infrastructure improvements that could result in temporary construction-related impacts. For projects that meet the requirements established pursuant to SB 610, SB 221, and Sections 10910-10915 of the State Water Code, a Water Supply Assessment demonstrating sufficient water availability is required on a project-by-project basis. Similar to the project, each related project would be required to comply with City and State water conservation programs. In addition, the LADWP undertakes expansion or modification of water service infrastructure to serve future growth in the City as required in the normal process of providing water service. As such, the proposed project would not contribute to a cumulatively considerable effect on water supply infrastructure. Therefore, no significant cumulative water supply impact is anticipated from development of the proposed project and the related projects.</p>	No mitigation measures required	Less than significant
<b>SOLID WASTE</b>		
<p><b>Construction</b></p> <p>Construction activities generate a variety of scraps and wastes, with the majority of</p>	The proposed project's impacts on the City's solid waste disposal facilities would be less than significant	Less than significant

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>recyclables being wood waste, drywall, metal, paper, and cardboard. Based on a construction generation rate of 4.38 pounds of waste for every square foot of new residential construction and 3.89 pounds of waste for every square foot of new nonresidential construction, the construction of the proposed project is estimated to generate approximately 723,347 pounds (362 tons) of solid waste over the construction period. Recycling of construction-related waste materials in compliance with AB 939 would substantially reduce this waste stream that would otherwise go to a landfill. Therefore, approximately 361,674 pounds (181 tons) of construction waste would be disposed of in the landfills. The remaining combined daily intake of the Sunshine Canyon and Chiquita Canyon Landfill is 5,619 tons per day. As such, they would have adequate capacity to accommodate the average daily construction waste of 181 tons generated by the proposed project over its entire construction period. Therefore, a less than significant impact associated with construction waste would occur.</p>	<p>and mitigation measures are therefore not required. Nonetheless, the following mitigation measures are recommended to reduce further the proposed project's already less than significant solid waste impacts:</p> <p>M.3-1 The construction contractor shall only contract for waste disposal services with a company that recycles construction related wastes.</p> <p>M.3-2 The project applicant shall separate onsite drywall materials from the construction trash debris and shall contract with a waste disposal company to sort and recycle remaining materials.</p>	
<p><b>Operation</b> Operation of the proposed project would result in ongoing generation of solid waste. Over the long term, the proposed project would be expected to generate 1,674 pounds or 0.84 tons of solid waste per day. The AB 939 requirement to reduce the solid waste stream in landfills by 50 percent means that 837 pounds (1,674/2) or 0.42 tons must be recycled rather than disposed of in a landfill. Thus, the proposed project would generate 837 pounds or 0.42 tons per day that would be disposed in local landfills. The Sunshine Canyon Landfill is permitted to receive 11,000 tons per day and currently receives 6,441 tons per day. Therefore, the Sunshine Canyon Landfill can receive the additional 4,559 tons per day. If the entire 837 pounds or 0.42 tons per day of solid waste generated by the proposed project was disposed of in the Sunshine Canyon Landfill, the Sunshine Canyon Landfill would have more than enough permitted capacity to accommodate this additional contribution per day. As the long-term solid waste that would be generated by the proposed project could be accommodated at the Sunshine Canyon</p>	<p>The following Mitigation Measures a recommended to further reduce the proposed projects less than significant impacts:</p> <p>M.3-3 Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. The proposed project shall comply with all applicable adopted recycling and waste diversion policies of the City of Los Angeles.</p>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>Landfill without causing the landfill to exceed its permitted daily capacity in the foreseeable future, the proposed project’s long term impact on solid waste facilities is considered less than significant.</p>		
<p><b>Cumulative Impacts</b></p> <p>Implementation of the proposed project in conjunction with the 53 related projects would increase solid waste generation. The estimated solid waste generation by the related projects in combination with the proposed project would be approximately 40,335 pounds (20 tons) per day.</p> <p>The Sunshine Canyon Landfill is permitted to receive up to 11,000 tons of solid waste each day. The Sunshine Canyon Landfill currently receives approximately 2,360 tons of solid waste daily from the City and 4,081 tons of solid waste daily from the County. Therefore the total daily intake is 6,441 tons daily and has a remaining daily capacity of 4,559 tons. Assuming that all of the cumulative solid waste is sent to the Sunshine Canyon Landfill with no waste stream diversion, the additional 20 tons per day would not cause the Sunshine Canyon Landfill to exceed its permitted daily capacity. Additional capacity to accommodate the cumulative disposal needs of the proposed project and related projects may become available as the City develops solutions to meet future disposal needs at a regional level (e.g., expanding existing landfills, transporting waste to other landfills, converting waste to energy, recycling, and waste reduction). Furthermore, similar to the proposed project, the related projects would be subject to the requirements of AB 939 (i.e., divert 50 percent of the solid waste generated from landfills through waste reduction, recycling, and composting). As with the proposed project, other future development projects would be required to participate in the City’s recycling program, thus reducing the amount of solid waste to be disposed of at the landfills described above. Since landfill capacities would be sufficient to accommodate the solid waste generation by cumulative growth, the proposed project would not contribute a cumulatively considerable effect on solid waste disposal facilities and</p>	<p>No Mitigation Measures required</p>	<p>Less than significant</p>

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
impacts would be less than significant.		
<b>ENERGY</b>		
<p><i>Electricity</i></p> <p>The project site is served by an underground 4.8 kV line on Wilshire Boulevard and Crescent Heights and an underground 34.5 kV line on Wilshire Boulevard. The circuits serving the project originate from Receiving Station H on 936 North Poinsettia Place.</p> <p>The LADWP has stated that there are no service problems or deficiencies in the project area. However, the near term and future additions and developments in the area have been identified as needing new distribution system capacity. Specifically, the project would require an on-site transformation facility. This is part of the routine planning for LADWP as part of its obligation to serve the needs of the City and the project would be accommodated with electricity. In addition, project design features such as the rooftop solar panels and LEED characteristics for building efficiency would help alleviate electrical demand. Finally, the project would be in compliance with Title 24 of the CCR requiring building energy efficiency standards. Therefore, because of energy efficient design features, compliance with Title 24, and the obligation of LADWP to service the City, project impacts related to electricity would be less than significant.</p> <p><i>Natural Gas</i></p> <p>The project is served by the following main lines: Wilshire Boulevard has a 6 inch steel main, Crescent Heights has a 2 inch steel main, and Orange Street has a 3 inch steel main</p> <p>SoCal Gas has stated that there are no known problems or deficiencies in the project area. In addition, project design features such as LEED characteristics to ensure building energy efficiency would alleviate some demand for natural gas typically expected from a building of this type and size. A natural gas survey of</p>	No Mitigation Measures required	Less than significant

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures Project Enhancements	Level of Significance After Mitigation
<p>equipment needs to be completed before knowing if the current infrastructure can sustain the demand for this project. Since natural gas demand varies with time, this can only be evaluated when the project is approved. At that time, SoCal Gas can gauge the anticipated supply and demand conditions. As the project area is currently served by adequate gas lines and the project would incorporate energy efficient design characteristics, it is assumed that impacts would be less than significant.</p> <p><b>Cumulative Impacts</b></p> <p>Of the 53 related projects, only those served by LADWP and SoCal Gas need to be evaluated as part of cumulative impacts as they would share the same distribution infrastructure.</p> <p><i>Electricity</i></p> <p>Related project nos. 1 through 14 are in the City of Beverly Hills and related project nos. 15 through 27 are in the City of West Hollywood. These cities receive electricity through Southern California Edison and not LADWP. Therefore, only related project nos. 28 through 53 would be served by LADWP. Each of these projects would be evaluated within its own context with consideration of energy conservation features that could alleviate electrical demand. Further, each project would need to be consistent with the building energy efficiency requirements of Title 24 and how LADWP serves each location with its existing distribution infrastructure. Finally, LADWP has an obligation to serve projects in the City and would be required to plan for new demand. Therefore, cumulative impacts to LADWP service would be less than significant.</p> <p><i>Natural Gas</i></p> <p>All 53 related projects would be served by SoCal Gas. As with the proposed project, each of the related projects would be evaluated within its own context with consideration of energy conservation features that could alleviate natural gas demand. Further, each project would need to be consistent with the building energy</p>		

**Table I-1 (Continued)  
Summary of Environmental Impacts and Mitigation Measures**

<b>Environmental Impact</b>	<b>Mitigation Measures Project Enhancements</b>	<b>Level of Significance After Mitigation</b>
<p>efficiency requirements of Title 24 as well as how SoCal Gas serves each location with its existing distribution infrastructure. SoCal Gas uses gauging to evaluate supply and demand for each project. At that time, it can decide whether new infrastructure is needed. As each related project would have to comply with these procedures for energy efficiency and to be served by SoCal Gas, cumulative impacts to SoCal Gas would be less than significant.</p>		

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## II. COMMENTS AND RESPONSES

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### A. OVERVIEW

The purpose of the public review of the Draft EIR (DEIR) is to evaluate the adequacy of the environmental analysis in terms of compliance with CEQA. Section 15151 of the CEQA Guidelines states the following regarding standards from which adequacy is judged:

*An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts. The courts have not looked for perfection but for adequacy, completeness, and a good faith effort at full disclosure.*

The purpose of each response to a comment on the Draft EIR is to address the significant environmental issue(s) raised by each comment. This typically requires clarification of points contained in the Draft EIR. Section 15088 (b) of the CEQA Guidelines describes the evaluation that CEQA requires in the response to comments. It states that:

*The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.*

Section 15204(a) (Focus of Review) of the CEQA Guidelines helps the public and public agencies to focus their review of environmental documents and their comments to lead agencies. Case law has held that the lead agency is not obligated to undertake every suggestion given them, provided that the agency responds to significant environmental issues and makes a good faith effort at disclosure. Section 15204.5(a) of the CEQA Guidelines clarifies this for reviewers and states:

*In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as*

*the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.*

The guideline encourages reviewers to examine the sufficiency of the environmental document, particularly in regard to significant effects, and to suggest specific mitigation measures and project alternatives. Given that an effect is not considered significant in the absence of substantial evidence, subsection (c) advises reviewers that comments should be accompanied by factual support. Section 15204(c) states:

*Reviewers should explain the basis for their comments, and, should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.*

## **B. LIST OF THOSE WHO COMMENTED ON THE DRAFT EIR**

The City of Los Angeles Department of City Planning received a total of 20 comment letters on the Draft EIR. Each comment letter has been assigned a corresponding number, and comments within each comment letter are also numbered. For example, comment letter “1” is from the State Clearinghouse and Planning Unit. The comments in this letter are numbered “1-1”, “1-2”, “1-3”, etc.

Written comments made during the public review of the Draft EIR intermixed points and opinions relevant to project approval/disapproval with points and opinions relevant to the environmental review. The responses acknowledge comments addressing points and opinions relevant to consideration for project approval, and discuss as necessary the points relevant to the environmental review. The response “comment noted” is often used in cases where the comment does not raise a substantive issue relevant to the review of the environmental analysis. Such points are usually statements of opinion or preference regarding a project’s design or its presence as opposed to points within the purview of an EIR: environmental impact and mitigation. These points are relevant for consideration in the subsequent project approval process. In addition, the response “comment acknowledged” is generally used in cases where the commenter is correct.

During and after the public review period, the following organizations/persons provided written comments on the Draft EIR to the City of Los Angeles Department of City Planning:

<u>Commenters</u>	<u>Date</u>
1. State Clearinghouse and Planning Unit	September 29, 2009

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2.	Wastewater Engineering Services Division, Bureau of Sanitation	September 3, 2009
3.	Beverly Hills Department of Community Development	September 18, 2009
4.	Metropolitan Transportation Authority	September 24, 2009
5.	Barbara Rowe	August 24, 2009
6.	Joseph Blum	August 18, 2009
7.	Carolyn Brown	August 17, 2009
8.	Christine Scotti	August 25, 2009
9.	Jeffrey Vinnick	August 26, 2009
10.	Cathie Kamin	September 24, 2009
11.	Lenore Sachs	September 24, 2009
12.	Douglas Jefferson	September 24, 2009
13.	Mark Wakim	September 28, 2009
14.	Victoria Arch	September 28, 2009
15.	Elizabeth Roach	September 28, 2009
16.	Teresa Feldman	September 28, 2009
17.	Amy Galaudet and Tom Challenger	September 29, 2009
18.	Mark Wakim	September 29, 2009
19.	Christine Scotti	September 20, 2009
20.	Denise Lampron	September 1, 2009
21 A1 – 21 A34.	Form Letters	September 20, 2009



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



ARNOLD SCHWARZENEGGER  
GOVERNOR

September 29, 2009

CYNTHIA BRYANT  
DIRECTOR

RECEIVED  
CITY OF LOS ANGELES

OCT 06 2009

ENVIRONMENTAL  
UNIT

Jimmy Liao  
City of Los Angeles  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Subject: Wilshire Crescent Heights  
SCH#: 2008051017

Dear Jimmy Liao:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on September 28, 2009, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

1-1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

for: Scott Morgan  
Acting Director, State Clearinghouse

## **LETTER NO. 1**

Scott Morgan, Acting Director  
State Clearinghouse and Planning Unit  
Governor's Office of Planning and Research

### **Comment No. 1-1**

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on September 28, 2009, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

### **Response to Comment No. 1-1**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

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

File: SC.CE.

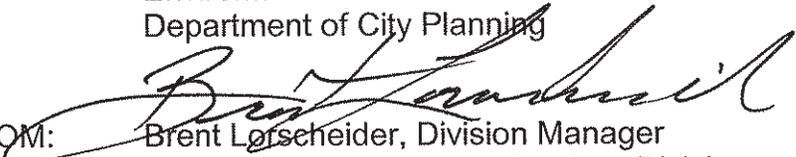
DATE: September 3, 2009

**RECEIVED**  
CITY OF LOS ANGELES

TO: Jimmy Liao, City Planner  
Environmental Review Section  
Department of City Planning

**SEP 09 2009**

ENVIRONMENTAL  
UNIT

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

SUBJECT: **Wilshire Crescent Heights – Draft EIR**

This is in response to your August 13, 2009 letter requesting a review of your proposed project. The Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

2-1

**WASTEWATER REQUIREMENT**

The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvement projects needed to provide future capacity as the City grows and develops.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
<b><i>Existing</i></b>			
Bank	80 GPD/1000 SQ.FT	7,117 SQ.FT	(569)
<b><i>Proposed</i></b>			
Residential: 2-BR	160 GPD/DU	158 DU	25,280
Retail	80 GPD/1000 SQ.FT	1,080 SQ.FT	86
Restaurant	300 GPD/1000 SQ.FT	1,570 SQ.FT	471
Commercial	80 GPD/1000 SQ.FT	4,200 SQ.FT	336
Townhouse: 3-BR	230 GPD/DU	4 DU	920
<b>Total</b>			<b>26,524</b>

2-2

## SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes the existing 8-inch line on Orange St and an existing 8-inch line on Wilshire Blvd. The sewage from the existing 8-inch lines on Orange St and Wilshire Blvd feeds into a 33-inch line on Schumacher Dr. Sewage before discharging into the 42-inch line on La Cienega Blvd. The current flow level (d/D) in the 8-inch line on Orange St cannot be determined at this time as gauging is needed.

Based on our existing gauging information, the current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	Orange St	*	280,862 GPD
8	Wilshire Blvd	19	362,591 GPD
33	Schumacher Dr	57	12.09 MGD
42	La Cienega Blvd	34	17.34 MGD

\* No gauging available

The estimated flow that would be generated from your proposed project exceeds 20,000 GPD and therefore may have a significant impact on the sewer system capacity. Thus, detailed gauging is necessary to determine whether the sewer system is capable of safely accommodating the total flow for your proposed project. We have initiated a work order to gauge the designated critical locations in the project area. This process usually takes approximately three (3) to four (4) weeks. A detailed evaluation and response will be provided to you within one (1) to two (2) weeks upon receipt of gauging data. If this schedule is not acceptable, please call us to discuss options.

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

## STORMWATER REQUIREMENTS

The Bureau of Sanitation, Watershed Protection Division is charged with enforcement of the provisions of the National Pollutant Discharge Elimination System (NPDES) permit.

## SUSMP AND STORM WATER INFILTRATION

The proposed project is subjected to Standard Urban Stormwater Mitigation Plan (SUSMP) regulations. The proposed project is required to incorporate measures to mitigate the impact of stormwater runoff as outlined in the guidance manuals titled "*Development Best Management Practices Handbook – Part B: Planning Activities*". In addition the "*SUSMP Infiltration Requirements and Guidelines*" prioritizes the use of infiltration and bio-filtration systems as the preferred methods to comply with SUSMP requirements. These documents

can be found at: [www.lastormwater.org/Siteorg/businesses/susmp/susmpintro.htm](http://www.lastormwater.org/Siteorg/businesses/susmp/susmpintro.htm). It is advised that input regarding SUSMP requirements be received in the early phases of the project from SUSMP review staff.

2-4

### GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The proposed project includes public right-of-way improvements and presents an opportunity to include Green Street elements as part of the project. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways. For more information regarding implementation of Green Street elements, please call Wing Tam at (213) 485-3985.

2-5

### WET WEATHER EROSION CONTROL

A Wet Weather Erosion Control Plan is required for construction during the rainy season (between October 1 and April 15 per Los Angeles Building Code, Sec. 7002). For more information, please see attached Wet Weather Erosion Control Guidelines.

2-6

### STORM WATER POLLUTION PREVENTION PLAN

A Storm Water Pollution Prevention Plan (SWPPP) is required for land disturbance activities over one acre. The SWPPP must be maintained on-site during the duration of construction.

2-7

WPD staff is available at your request to provide guidance on stormwater issues. Should you have any questions, please contact Meher Irani of my staff at (213) 485-0584.

### SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that apply to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact Special Projects Division.

2-8

Special Projects staff is available at your request to provide guidance on solid resource issues. Should you have any questions, please contact Daniel Hackney at (213)485-3684.

attachments:  
Wet Weather Erosion Control

c: Meher Irani, BOS  
Daniel Hackney, BOS  
Rowena Lau, BOS

**LETTER NO. 2**

Brent Lorscheider, Division Manager  
 Wastewater Engineering Services Division  
 Bureau of Sanitation

**Comment No. 2-1**

This is in response to your August 13, 2009 letter requesting review of your proposed project. The Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

**Response to Comment No. 2-1**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**Comment No. 2-2****WASTEWATER REQUIREMENT**

The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvement projects needed to provide future capacity as the City grows and develops.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
<b><i>Existing</i></b>			
Bank	80 GPD/1000 SQ. FT.	7,117 SQ. FT.	(569)
<b><i>Proposed</i></b>			
Residential: 2-BR	160 GPD/DU	158 DU	25,280
Retail	80 GPD/1000 SQ. FT.	1,080 SQ. FT.	86
Restaurant	300 GPD/1000 SQ. FT.	1,570 SQ. FT.	471
Commercial	80 GPD/1000 SQ. FT.	4,200 SQ. FT.	336
Townhouse: 3-BR	230 GPD/DU	4 DU	920
<b>Total</b>			<b>26,524</b>

**Response to Comment No. 2-2**

The proposed wastewater discharges for the proposed project as provided in this comment are the same as those contained in Section IV.M, Utilities, of the Draft EIR.

**Comment No. 2-3****SEWER AVAILABILITY**

The sewer infrastructure in the vicinity of the proposed project includes the existing 8-inch line on Orange St and an existing 8-inch line on Wilshire Blvd. The sewage from the existing 8-inch lines on Orange St and Wilshire Blvd feeds into a 33-inch line on Schumacher Dr. Sewage before discharging into the 42-inch line on La Cienega Blvd. The current flow level (d/D) in the 8-inch line on Orange St cannot be determined at this time as gauging is needed.

Based on our existing gauging information, the current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50 % Design Capacity
8	Orange St	*	280,862 GPD
8	Wilshire Blvd	19	362,591 GPD
33	Schumacher Dr	57	12.09 MGD
42	La Cienega Blvd.	34	17.34 MGD

\* No gauging available

The estimated flow that would be generated from your proposed project exceeds 20,000 GPD and therefore may have a significant impact on the sewer system capacity. Thus, detailed gauging is necessary to determine whether the sewer system is capable of safely accommodating the total flow for your proposed project. We have initiated a work order to gauge the designated critical locations in the project area. This process usually takes approximately three (3) to four (4) weeks. A detailed evaluation and response will be provided to you within one (1) to two (2) weeks upon receipt of gauging data. If this schedule is not acceptable, please call us to discuss options.

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

**Response to Comment No. 2-3**

The information provided in the Draft EIR regarding sewer availability was provided by the City of Los Angeles Bureau of Sanitation via written correspondence dated February 21, 2008. If the detailed gauging shows that there is insufficient capacity in the Orange Street line, the project shall be responsible for upgrading this line to accommodate the additional flows. It is acknowledged that this comment states

slightly different information than what is presented in Section IV.M.1, Utilities/Service Systems, Wastewater, of the Draft EIR (for example the design capacities of the pipes are greater than shown in the Draft EIR), but does not change the conclusions of the Draft EIR. Please see Section III, Additions and Corrections, of this Final EIR for the revised information.

#### **Comment No. 2-4**

#### **STORMWATER REQUIREMENTS**

The Bureau of Sanitation, Watershed Protection Division is charged with enforcement of the provisions of the National Pollutant Discharge Elimination System (NPDES) permit.

#### **SUSMP AND STORM WATER INFILTRATION**

The proposed project is subjected to Standard Urban Stormwater Mitigation Plan (SUSMP) regulations. The proposed project is required to incorporate measures to mitigate the impact of stormwater runoff as outlined in the guidance manuals titled "*Development Best Management Practices Handbook - Part B: Planning Activities*". In addition the "*SUSMP Infiltration Requirements and Guidelines*" prioritizes the use of infiltration and bio-filtration systems as the preferred methods to comply with SUSMP requirements. These documents can be found at: [www.lastormwater.org/Siteorg/businesses/susmp/susmpintro.htm](http://www.lastormwater.org/Siteorg/businesses/susmp/susmpintro.htm). It is advised that input regarding SUSMP requirements be received in the early phases of the project from SUSMP review staff.

#### **Response to Comment No. 2-4**

The NPDES and SUSMP are discussed throughout Section IV.G, Hydrology/Water Quality, of the Draft EIR. As stated on page IV.G-7, the proposed project will comply with all applicable requirements associated with NPDES Permit No. CA0061654, SUSMP and all relevant storm water quality management regulations. Ordinance No. 172,176 and Ordinance 173,494 specify Stormwater and Urban Runoff Pollution Control which requires the application of Best Management Practices (BMPs). Therefore, it is concluded that water quality impacts would be less than significant.

#### **Comment No. 2-5**

#### **GREEN STREETS**

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The proposed project includes public right-of-way improvements and presents an opportunity to include Green Street elements as part of the project. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration

systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways. For more information regarding implementation of Green Street elements, please call Wing Tam at (213) 485-3985.

#### **Response to Comment No. 2-5**

The comment describes the under-development Green Street Initiative. Details of stormwater management and filtration systems that would be part of this initiative are not available. However, the project would implement LEED features, including stormwater management and filtration systems to help minimize downstream pollution from roof and site water runoff. This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

#### **Comment No. 2-6**

##### WET WEATHER EROSION CONTROL

A Wet Weather Erosion Control Plan is required for construction during the rainy season (between October 1 and April 15 per Los Angeles Building Code, Sec. 7002). For more information, please see attached Wet Weather Erosion Control Guidelines.

#### **Response to Comment No. 2-6**

The project would comply with the requirements of SUSMP, NPDES Permit No. CA0061654, the SWRCB General Construction Activity Storm Water Permit Process, NPDES Permit No. CAG994004, and City of Los Angeles Ordinance No. 172,176, Ordinance No. 173,494 and Chapter IX, Division 70 of the Los Angeles Municipal Code. These requirements include a Wet Weather Erosion Control Plan for construction during the rainy season. This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

#### **Comment No. 2-7**

##### STORM WATER POLLUTION PREVENTION PLAN

A Storm Water Pollution Prevention Plan (SWPPP) is required for land disturbance activities over one acre. The SWPPP must be maintained on-site during the duration of construction.

WPD staff is available at your request to provide guidance on stormwater issues. Should you have any questions, please contact Meher Irani of my staff at (213) 485-0584.

**Response to Comment No. 2-7**

The project would implement a SWPPP. See Response to Comment No. 1-6.

**Comment No. 2-8**

**SOLID RESOURCE REQUIREMENTS**

The City has a standard requirement that apply to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact Special Projects Division.

Special Projects staff is available at your request to provide guidance on solid resource issues. Should you have any questions, please contact Daniel Hackney at (213) 485-3684.

**Response to Comment No. 2-8**

The proposed project shall be consistent with all applicable requirements and regulations, including compliance with the City's solid resource requirements. This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.



RECEIVED  
CITY OF LOS ANGELES

SEP 24 2009

ENVIRONMENTAL  
UNIT

September 18, 2009

Jimmy Liao, City Planner  
EIR Unit  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, California 90012

RE: Wilshire Crescent Heights Project DEIR  
ENV-2008-0729-EIR

Dear Mr. Liao:

I would like to thank you for providing the opportunity to the City of Beverly Hills to comment on the Draft Environmental Impact Report prepared for the Wilshire Crescent Heights Project. Beverly Hills is interested in this project and would appreciate continuing to receive public notices on the Wilshire Crescent Heights Project as it proceeds through the environmental assessment and public hearing processes.

3-1

Traffic issues are an ongoing concern in our community. While the Draft EIR concludes that the project's impacts to the Wilshire/La Cienega intersection, one of the Congestion Management Plan regional intersections, are not expected to be significant, our City Traffic Engineer has asked that the intersection be evaluated using an ICU analysis. Our previous traffic analyses of the intersection indicate that the intersection is expected to be operating at LOS F (future conditions). As such, despite the LA County CMP guidelines, it is possible that the intersection could be impacted significantly with less than 50 trips. I've included worksheets from our 8600 Wilshire EIR.

3-2

Our Traffic Engineer has also asked for greater explanation and justification of the use of high pass-by trip reductions and confirmation that these reductions are approved by the City of Los Angeles.

3-3

Jimmy Liao, City Planner  
Wilshire Crescent Heights Project DEIR/ENV-2008-0729-EIR  
September 18, 2009  
Page 2 of 3

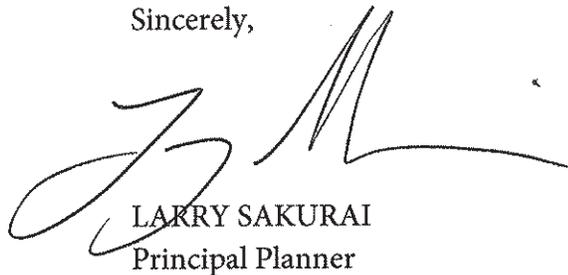
We ask that if the project is approved, heavy haul routing be prohibited from utilizing Beverly Hills streets and intersections, particularly the intersection of Wilshire Boulevard and La Cienega Boulevard, as a condition of approval.

3-3

Again, I thank you for your involvement of the City of Beverly Hills on this project. I look forward to working with you through this process.

3-4

Sincerely,



LARRY SAKURAI  
Principal Planner

cc: Aaron Kunz, Deputy Director of Transportation  
Jonathan Lait, AICP, City Planner  
Susan Healy Keene, AICP, Director of Community Development  
Mahdi Aluzri, AICP, Assistant City Manager

8600 Wilshire Project EIR LOS Worksheets

Level Of Service Computation Report  
 ICU 1 (Loss as Cycle Length %) Method (Future Volume Alternative)  
 Intersection #4 La Cienega Bl & Wilshire Bl  
 Cycle (sec): 100 Critical Vol./Cap. (X): 1.169  
 Loss Time (sec): 10 (Y+R = 4 sec) Average Delay (sec/veh): xxxxxx  
 Optimal Cycle: 180 Level Of Service: F  
 Street Name: La Cienega Bl Wilshire Bl  
 Approach: North Bound South Bound East Bound West Bound  
 Movement: L - T - R L - T - R L - T - R L - T - R  
 Control: Prot+Permit Prot+Permit Prot+Permit Prot+Permit  
 Rights: Include Include Include Include  
 Min. Green: 0 0 0 0  
 Lanes: 1 0 2 1 0 1 0 2 1 0 1 0 2 1 0  
 Volume Module:  
 Base Vol: 180 1479 175 155 1527 140 214 2129 198 184 1579 69  
 Growth Adj: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 Initial Bse: 180 1479 175 155 1527 140 214 2129 198 184 1579 69  
 Added Vol: 1 0 0 0 0 0 7 17 31 3 0 12 0  
 PasserByVol: 0 0 0 0 0 0 0 0 0 0 0 0  
 Initial Fut: 181 1479 175 155 1527 147 231 2160 201 184 1591 69  
 User Adj: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 PHF Adj: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 PHF Volume: 181 1479 175 155 1527 147 231 2160 201 184 1591 69  
 Reduct Vol: 0 0 0 0 0 0 0 0 0 0 0 0  
 Reduced Vol: 181 1479 175 155 1527 147 231 2160 201 184 1591 69  
 PCE Adj: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 MFL Adj: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 Final Vol.: 181 1479 175 155 1527 147 231 2160 201 184 1591 69  
 Saturation Flow Module:  
 Sat/Lane: 1600 1600 1600 1600 1600 1600 1600 1600 1600 1600 1600 1600  
 Adjustment: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 Lanes: 1.00 2.68 0.32 1.00 2.74 0.26 1.00 2.74 0.26 1.00 2.88 0.12  
 Final Sat.: 1600 4292 508 1600 4378 422 1600 4391 409 1600 4600 200  
 Capacity Analysis Module:  
 Vol/Sat: 0.11 0.34 0.34 0.10 0.35 0.35 0.14 0.49 0.49 0.12 0.35 0.35  
 Crit Moves: \*\*\*\*  
 \*\*\*\*\*

Level Of Service Computation Report  
 ICU 1 (Loss as Cycle Length %) Method (Future Volume Alternative)  
 Intersection #4 La Cienega Bl & Wilshire Bl  
 Cycle (sec): 100 Critical Vol./Cap. (X): 1.169  
 Loss Time (sec): 10 (Y+R = 4 sec) Average Delay (sec/veh): xxxxxx  
 Optimal Cycle: 180 Level Of Service: F  
 Street Name: La Cienega Bl Wilshire Bl  
 Approach: North Bound South Bound East Bound West Bound  
 Movement: L - T - R L - T - R L - T - R L - T - R  
 Control: Prot+Permit Prot+Permit Prot+Permit Prot+Permit  
 Rights: Include Include Include Include  
 Min. Green: 0 0 0 0  
 Lanes: 1 0 2 1 0 1 0 2 1 0 1 0 2 1 0  
 Volume Module:  
 Base Vol: 180 1479 175 155 1527 140 214 2129 198 184 1579 69  
 Growth Adj: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 Initial Bse: 180 1479 175 155 1527 140 214 2129 198 184 1579 69  
 Added Vol: 1 0 0 0 0 0 7 17 31 3 0 12 0  
 PasserByVol: 0 0 0 0 0 0 0 0 0 0 0 0  
 Initial Fut: 181 1479 175 155 1527 147 231 2160 201 184 1591 69  
 User Adj: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 PHF Adj: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 PHF Volume: 181 1479 175 155 1527 147 231 2160 201 184 1591 69  
 Reduct Vol: 0 0 0 0 0 0 0 0 0 0 0 0  
 Reduced Vol: 181 1479 175 155 1527 147 231 2160 201 184 1591 69  
 PCE Adj: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 MFL Adj: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 Final Vol.: 181 1479 175 155 1527 147 231 2160 201 184 1591 69  
 Saturation Flow Module:  
 Sat/Lane: 1600 1600 1600 1600 1600 1600 1600 1600 1600 1600 1600 1600  
 Adjustment: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 Lanes: 1.00 2.68 0.32 1.00 2.74 0.26 1.00 2.74 0.26 1.00 2.88 0.12  
 Final Sat.: 1600 4292 508 1600 4378 422 1600 4391 409 1600 4600 200  
 Capacity Analysis Module:  
 Vol/Sat: 0.11 0.34 0.34 0.10 0.35 0.35 0.14 0.49 0.49 0.12 0.35 0.35  
 Crit Moves: \*\*\*\*  
 \*\*\*\*\*

**LETTER NO. 3**

Larry Sakurai, Principal Planner  
City of Beverly Hills Department of Community Development  
455 N. Rexford Drive  
Beverly Hills, CA 90210

**Comment No. 3-1**

I would like to thank you for providing the opportunity to the City of Beverly Hills to comment on the Draft Environmental Impact Report prepared for the Wilshire Crescent Heights Project. Beverly Hills is interested in this project and would appreciate continuing to receive public notices on the Wilshire Crescent Heights Project as it proceeds through the environmental assessment and public hearing processes.

**Response to Comment No. 3-1**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**Comment No. 3-2**

Traffic issues are an ongoing concern in our community. While the Draft EIR concludes that the project's impacts to the Wilshire/La Cienega intersection, one of the Congestion Management Plan regional intersections, are not expected to be significant, our City Traffic Engineer has asked that the intersection be evaluated using an ICU analysis. Our previous traffic analyses of the intersection indicate that the intersection is expected to be operating at LOS F (future conditions). As such, despite the LA County CMP guidelines, it is possible that the intersection could be impacted significantly with less than 50 trips. I've included worksheets from our 8600 Wilshire EIR.

**Response to Comment No. 3-2**

As indicated in the Draft EIR (Figures IV.L-14 and IV.I-15), net project traffic travelling along Wilshire Boulevard into and out of the City of Beverly Hills (west of Wilshire Boulevard and San Vicente Boulevard), are forecast to be approximately 8 westbound and 5 eastbound trips (total of 13 trips) during the AM peak hour, with a reduction of approximately 3 westbound trips (versus existing site-generated traffic) and no net new eastbound trips during the PM peak hour (total reduction of 3 trips). Using the City of Beverly Hills' requested ICU analysis methodology, which assigns a capacity of 1,600 vehicles per hour per lane, even if all of these net project trips were assigned to a single critical lane at the subject intersection, the potential project impacts would be +0.008 (13 vehicles/1,600 vehicle per lane capacity) during the AM peak hour, and -0.002 (reduction of 3 vehicles/1,600 vehicles per lane) during the PM peak hour. Further, assuming the future LOS F intersection conditions noted by the commenter during

both the AM and PM peak hours, the maximum project impacts would be less than significant under either the City of Los Angeles impact criteria (increase of 0.010 or more at LOS F) or City of Beverly Hills impact criteria (increase of 0.020 or more at LOS F). Therefore, as described in the project Draft EIR, the project would not result in significant impacts at the intersection of Wilshire Boulevard/La Cienega Boulevard during either the AM or PM peak hours, regardless of the analysis methodology, future level of service, or significance thresholds.

### **Comment No. 3-3**

Our Traffic Engineer has also asked for greater explanation and justification of the use of high pass-by trip reductions and confirmation that these reductions are approved by the City of Los Angeles.

We ask that if the project is approved, heavy haul routing be prohibited from utilizing Beverly Hills streets and intersections, particularly the intersection of Wilshire Boulevard and La Cienega Boulevard, as a condition of approval.

### **Response to Comment No. 3-3**

The project trip generation assumptions used in the traffic study upon which the Draft EIR is based, including the subject pass-by trip reductions, were approved by LADOT as part of the traffic study Memorandum of Understanding (MOU) process in January 2008. The specific pass-by reduction percentages for each of the project's commercial uses are identical to those identified in LADOT's current Traffic Study Policies and Procedures.

As identified on pages II-22 and II-23 (Chapter II - Project Description) of the Draft EIR, the proposed haul route is designed to minimize impacts to area surface streets by using the most direct travel path to the nearest freeway facility, in this case, the I-10 freeway to the south. The loaded haul trucks will leave the site and travel westbound on Wilshire Boulevard to La Cienega Boulevard, where they will turn left to travel on La Cienega Boulevard to the I-10 freeway. However, a total of only 8 to 10 haul trucks per day are expected, minimizing potential impacts on these roadways. Further, the "inbound" travel route for haul trucks would not utilize La Cienega Boulevard, instead exiting the I-10 freeway at La Brea Avenue to travel to Wilshire Boulevard and ultimately to the project site. It is expected that conditions of approval will be attached to the project to further limit or reduce any temporary construction and/or haul traffic impacts.

### **Comment No. 3-4**

Again, I thank you for your involvement of the City of Beverly Hills on this project. I look forward to working with you through this process.

### **Response to Comment No. 3-4**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to

CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.



# Metro

September 24, 2009

Jimmy Liao  
Environmental Review Section  
Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

SEP 29 2009

ENVIRONMENTAL  
UNIT

Dear Mr. Liao,

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

4-1

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

4-2

1. Current bus service: Wilshire Boulevard currently has very high levels of bus transit service and ridership with various bus lines that travel by and stop at or near the proposed project site. Please be advised that Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines. Metro should also be contacted if any changes to existing stops and zones are anticipated either during or after construction. Other Municipal Bus Service Operators may also be impacted and therefore should be included in the FEIR and included in construction outreach efforts.

4-3

2. Wilshire Bus Lane Project: Metro, in partnership with the City of Los Angeles, is currently moving forward with an Environmental Assessment for a federally-funded, peak period exclusive bus lane along Wilshire Boulevard within the City of Los Angeles. The bus lane is anticipated to operate in the AM and PM peak periods and prohibit general purpose traffic from using the curb lane on Wilshire Boulevard between 7:00-9:00 a.m. and 4:00-7:00 p.m. The FEIR should discuss the transit and non-transit modal share of the project in the context of mobility along Wilshire Boulevard with a potential exclusive bus lane. Please contact Metro Project Manager Martha Butler if you require further information about this project. Ms. Butler can be reached at 213-922-7651 or butlerm@metro.net.

4-4

3. Westside Subway Extension: The proposed project site is located along the route of the Westside Subway Extension that was approved by the voters of Los Angeles County through the passage of Measure R in November 2008. An Alternatives Analysis Study was completed in January 2009 and a Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) is currently being prepared. A station at Wilshire/Fairfax is planned which, depending upon the size of the underground subway station construction, could be located in close proximity to the proposed Wilshire/Crescent Heights project. Some of the locations under consideration for a station are immediately adjacent to the Wilshire Crescent Heights property. Metro would request that the developer work with Metro to ensure that the design of the project, including the parking garage and ramps, coordinates with, and does not impinge on the design of the future subway tunnels and station. It will be critically important that each project accommodate the other, to avoid future expense, disruption and

4-5

delay for both parties. The current schedule for the subway in this area calls for a start of construction in 2013 and completion of construction in 2018-19.

4. Metro has had many communications with staff from the City of Los Angeles, including staff from the Planning Department, discussing a variety of land use strategies and policies that could be followed for new development projects immediately adjacent to the Westside Extension subway stations which follow best practices for "Transit Oriented Development." The federal government looks for cities and local jurisdictions to adequately plan for new development around such stations to encourage use of the transit system and reduce use of conventional development practices that rely almost exclusively on the automobile for access. Because of the heavy reliance on auto trips for the Wilshire-Crescent Heights project, significant adverse traffic impacts would be imposed on Wilshire Boulevard that might not occur if modified parking requirements and greater utilization of public transit were built into the planning for this project.

Much of Metro's discussions with the City of Los Angeles has highlighted the need not just for good transportation/transit-oriented development throughout the study area, but also the necessity to treat those projects that are close to rail stations differently for parking, pedestrian access and other factors. Metro does not see anything in the EIR for this project that treats it differently than if this project were located elsewhere in areas of Los Angeles that are not planned to be served by high capacity rail transit.

Please contact the Westside Subway Extension Project Director David Mieger for further coordination regarding this project. Mr. Mieger can be reached at 213-922-3040 or [miegerd@metro.net](mailto:miegerd@metro.net). Information about the Westside Subway Extension can be found on the Metro website at [http://www.metro.net/projects\\_studies/westside/default.htm](http://www.metro.net/projects_studies/westside/default.htm).

In addition, the following issue should be addressed:

5. Metro did not receive the Notice of Availability of a Draft Environmental Impact Report for the proposed project. Please ensure that Metro is included in future project outreach efforts.

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

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

Sincerely,



Susan Chapman  
Program Manager, Long Range Planning

cc: Renee Berlin  
Martha Butler  
Jody Feerst Litvak  
Rex Gephart  
David Mieger

4-5

4-6

4-7

4-8

**LETTER NO. 4**

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

**Comment No. 4-1**

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

**Response to Comment No. 4-1**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**Comment No. 4-2**

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

**Response to Comment No. 4-2**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Please see the responses to comments 3-3 through 3-8, below for more specific response to concerns about transit service.

**Comment No. 4-3**

1. Current bus service: Wilshire Boulevard currently has very high levels of bus transit service and ridership with various bus lines that travel by and stop at or near the proposed project site. Please be advised that Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines. Metro should also be contacted if any changes to existing stops and zones are anticipated either during or after construction. Other Municipal Bus Service Operators may also be impacted and therefore should be included in the FEIR and included in construction outreach efforts.

**Response to Comment No. 4-3**

The project will be required to prepare and receive approval from the City for a worksite traffic control plan prior to the initiation of any construction activities which would affect the area roadways. The worksite traffic control plan, which will identify any potential lane closures or other temporary changes to the area roadway system, will be designed to minimize impacts to traffic circulation during project construction-related activities, including possible impacts to bus stops or other Metro facilities. Metro will be contacted if any changes to existing stops and zones are proposed.

**Comment No. 4-4**

2. Wilshire Bus Lane Project: Metro, in partnership with the City of Los Angeles, is currently moving forward with an Environmental Assessment for a federally-funded, peak period exclusive bus lane along Wilshire Boulevard within the City of Los Angeles. The bus lane is anticipated to operate in the AM and PM peak periods and prohibit general purpose traffic from using the curb lane on Wilshire Boulevard between 7:00-9:00 a.m. and 4:00-7:00 p.m. The FEIR should discuss the transit and non-transit modal share of the project in the context of mobility along Wilshire Boulevard with a potential exclusive bus lane. Please contact Metro Project Manager Martha Butler if you require further information about this project. Ms. Butler can be reached at 213-922-7651 or butlern@metro.net.

**Response to Comment No. 4-4**

As described in the Draft EIR (Section IV.L – Traffic/Transportation), approximately 5% of the proposed project's residential component trips are anticipated to utilize the nearby transit services, a total of approximately 54 daily trips, including about 4 AM and 5 PM peak hour trips. Further assuming a typical average vehicle occupancy of approximately 1.2 persons per vehicle, these vehicle trips convert to a total of approximately 65 person trips per day, including 5 person trips during the AM peak hour and 6 person trips during the PM peak hour. This level of project-generated new transit ridership would be distributed throughout the various bus routes and providers serving the project site, and as such, no significant impacts to bus capacity or operations due to the project are expected. As noted by the commenter, the proposed Wilshire Bus Lane Project is currently underway with its Environmental Assessment. While the introduction of this convenient transit facility in close proximity to the proposed Wilshire/Crescent Heights project is likely to encourage greater transit utilization by project residents, visitors, and patrons, specific project-related transit ridership estimates cannot be identified until detailed bus headways and schedules are identified. However, it is anticipated that the proposed Wilshire Bus Lane Project environmental assessments will include estimates of the anticipated potential ridership demands along its route, including the proposed Wilshire/Crescent Heights project, and that the Bus Lane project will include sufficient capacity to accommodate patronage by the proposed Wilshire/Crescent Heights project as well as other proposed and ongoing developments along its route. As such, no significant project-related impacts to future bus or other transit facilities are anticipated. Additionally, it should be noted that increased transit utilization by residents or visitors of the Wilshire/Crescent Heights project will act to reduce the project's potential traffic impacts as identified in the Draft EIR.

**Comment No. 4-5**

3. Westside Subway Extension: The proposed project site is located along the route of the Westside Subway Extension that was approved by the voters of Los Angeles County through the passage of Measure R in November 2008. An Alternatives Analysis Study was completed in January 2009 and a Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) is currently being prepared. A station at Wilshire/Fairfax is planned which, depending upon the size of the underground subway station construction, could be located in close proximity to the proposed Wilshire/Crescent Heights project. Some of the locations under consideration for a station are immediately adjacent to the Wilshire Crescent Heights property. Metro would request that the developer work with Metro to ensure that the design of the project, including the parking garage and ramps, coordinates with, and does not impinge on the design of the future subway tunnels and station. It will be critically important that each project accommodate the other, to avoid future expense, disruption and delay for both parties. The current schedule for the subway in this area calls for a start of construction in 2013 and completion of construction in 2018-19.

**Response to Comment No. 4-5**

The project applicant will coordinate with Metro and other agencies as the project design is finalized in order to assure that the Wilshire/Crescent Heights project and any future construction of tunnels, stations, or other infrastructure for the Westside Subway Extension are compatible. It should be noted that the anticipated completion date for the Wilshire/Crescent Heights project is 2012, one year prior to the estimated start of construction on the Westside Subway Extension project.

**Comment No. 4-6**

4. Metro has had many communications with staff from the City of Los Angeles, including staff from the Planning Department, discussing a variety of land use strategies and policies that could be followed for new development projects immediately adjacent to the Westside Extension subway stations which follow best practices for "Transit Oriented Development." The federal government looks for cities and local jurisdictions to adequately plan for new development around such stations to encourage use of the transit system and reduce use of conventional development practices that rely almost exclusively on the automobile for access. Because of the heavy reliance on auto trips for the Wilshire-Crescent Heights project, significant adverse traffic impacts would be imposed on Wilshire Boulevard that might not occur if modified parking requirements and greater utilization of public transit were built into the planning for this project.

**Response to Comment No. 4-6**

The project traffic study assumed a reasonable 5% transit utilization for the residential components of the proposed project, based on the current availability of transit in the area. Although as noted in Comment 3-4 and Comment 3-5 additional transit services are proposed for the project vicinity, neither the Wilshire Bus Lane project nor the Westside Subway Extension project are currently approved, and as such, must

be considered speculative with regard to additional project resident and/or visitor utilizations. As such, since the infrastructure to support any substantial increase in project transit use cannot reasonably be assured within the study timeline, no reliance on such transit utilization as a means of reducing potential project traffic impacts was included in the project traffic study and Draft EIR, and therefore, these analyses identify the potential “worst case” traffic impacts for the project. The applicant is amenable to working with Metro and the City Planning Department in order to promote increased transit use.

As noted by the commenter, the proposed Wilshire Bus Lane Project is currently underway with its Environmental Assessment. While the introduction of this convenient transit facility in close proximity to the proposed Wilshire/Crescent Heights project is likely to encourage greater transit utilization by project residents, visitors, and patrons, specific project-related transit ridership estimates cannot be identified until detailed bus headways and schedules are identified. However, it is anticipated that the proposed Wilshire Bus Lane Project environmental assessments will include estimates of the anticipated potential ridership demands along its route, including the proposed Wilshire/Crescent Heights project, and that the Bus Lane project will include sufficient capacity to accommodate patronage by the proposed Wilshire/Crescent Heights project as well as other proposed and ongoing developments along its route. Additionally, it should be noted that increased transit utilization by residents or visitors of the Wilshire/Crescent Heights project will act to reduce the project’s potential traffic impacts as identified in the Draft EIR

#### **Comment No. 4-7**

Much of Metro's discussions with the City of Los Angeles has highlighted the need not just for good transportation/transit-oriented development throughout the study area, but also the necessity to treat those projects that are close to rail stations differently for parking, pedestrian access and other factors. Metro does not see anything in the EIR for this project that treats it differently than if this project were located elsewhere in areas of Los Angeles that are not planned to be served by high capacity rail transit.

Please contact the Westside Subway Extension Project Director David Mieger for further coordination regarding this project. Mr. Mieger can be reached at 213-922-3040 or miegerd@metro.net. Information about the Westside Subway Extension can be found on the Metro website at <http://www.metro.net/projects/studies/westside/default.htm>.

#### **Response to Comment No. 4-7**

See Response 4-6.

#### **Comment No. 4-8**

In addition, the following issue should be addressed:

5. Metro did not receive the Notice of Availability of a Draft Environmental Impact Report for the proposed project. Please ensure that Metro is included in future project outreach efforts.

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

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

### **Response to Comment No. 4-8**

CEQA Guidelines Section 15087 provides the requirements for notifying the public of the availability of the Draft EIR. Subsection (a) states that notice must be given by one of the following three options:

- (1) Publication at least one time by the public agency in a newspaper of general circulation in the area affected by the proposed project. If more than one area is affected, the notice shall be published in the newspaper of largest circulation from among the newspapers of general circulation in those areas.
- (2) Posting of notice by the public agency on and off the site in the area where the project is to be located.
- (3) Direct mailing to the owners and occupants of property contiguous to the parcel or parcels on which the property is located. Owners of such property shall be identified as shown on the latest equalized assessment roll.

The Notice of availability of the Draft EIR was provided in accordance with both (1) and (3) above. The Notice of Availability of the Draft EIR was published in the LA Times on August 13, 2009. The Notice of Availability was also mailed to the owners and occupants of property within a 500-foot radius of the project site. In addition, the Notice of Availability was also mailed to all persons who provided comments on the Notice of Preparation as well as to applicable public agencies as determined by the City of Los Angeles. A Notice of Availability and a CD of the Draft EIR were sent to Metro and were received and signed for on August 13, 2009. The mailing list used to provide notice and delivery confirmations are on file at the City of Los Angeles, Department of Planning. A copy of the Final EIR will be provided to Metro.

From: Jimmy Liao <Jimmy.Liao@lacity.org>  
Subject: Re: ENV-2008-0729-EIR (Wilshire Crescent Heights))  
To: "BARBARA ROWE" <mhlrlvr@att.net>  
Date: Monday, August 24, 2009, 10:33 AM

RECEIVED  
CITY OF LOS ANGELES

SEP 29 2009

ENVIRONMENTAL  
UNIT

Dear Ms. Rowe,

Thank you for your comment on the Wilshire Crescent Heights DEIR. Your comment will be taken into consideration in the preparation of the Final EIR. Have a great day.

Jimmy Liao  
City Planning Department

-----  
Dear Sir,

This is a potential health hazard to the area and life threatening as the traffic on Crescent Heights now does not allow residents on Orange Street (between Wilshire and 6th Street access onto Crescent Heights and any increase in traffic will provide a "land lock" to say nothing of the health hazard if this project is approved.

5-1

Have the city planners gone completely mad or do they not have the time to visit our area and observe the traffic problems and accidents in the last few months.

5-2

Thank you for your attention

Barbara Rowe  
6151 Orange Street  
Los Angeles 90048

**LETTER NO. 5**

Barbara Rowe  
6151 Orange Street  
Los Angeles, CA 90048

**Comment No. 5-1**

This is a potential health hazard to the area and life threatening as the traffic on Crescent Heights now does not allow residents on Orange Street (between Wilshire and 6th Street access onto Crescent Heights and any increase in traffic will provide a "land lock" to say nothing of the health hazard if this project is approved.

**Response to Comment No. 5-1**

An additional analysis was conducted to determine the potential for project impacts on the segments of La Jolla Avenue between 6th Street and Wilshire Boulevard, and along Orange Street adjacent to the project site, and to the west of Crescent Heights Boulevard. Results of this analysis are shown in Table IV.L-8 of the Draft EIR. The analysis showed that there would be no significant impact to La Jolla Avenue or Orange Street from the project.

**Comment No. 5-2**

Have the city planners gone completely mad or do they not have the time to visit our area and observe the traffic problems and accidents in the last few months.

**Response to Comment No. 5-2**

The results of the analyses indicate that the proposed project could potentially result in significant traffic impacts at three of the 11 study intersections during one or both peak hours; at 6th Street and Fairfax Avenue (PM peak hour), at Wilshire Boulevard and Crescent Heights Boulevard/McCarthy Vista (AM peak hour), and at Wilshire Boulevard and Fairfax Avenue (both peak hours). The Draft EIR acknowledges significant and unavoidable impacts from these impacts. This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**From:** Joseph Blum <jblumre@gmail.com>  
**To:** <jimmy.liao@lacity.org>  
**Date:** 8/18/2009 1:17 PM  
**Subject:** Wilshire Crescent Heights

Joseph Blum 1753 Orchid Avenue, Los Angeles, CA 90028

August 18 2009

Jimmy C. Liao, City Planner

Department of City Planning

200 North Spring Street, room 750, City Hall

Los Angeles, CA 90012

EIR ENV-2008-0729-EIR

Project Name Wilshire Crescent Heights

Dear Mr. Liao;

The EIR on the project above is impressive, but does not change my position by much.

The size of the proposed development is daunting and not fitting the neighborhood. This is more

density than the neighborhood can bear from all angles (traffic, parking, quality of life, pollution

visual clutter etc.).

I understand the need for the owner to get more income from this property and the fact that the zoning

probably permit much higher use that is there now. However fail to see the need to make it this large

and more importantly I fail to see that the City would want to allow such dense development in this

neighborhood.

They are proposing excellent parking for the building but you know that adding busy driveways to this



intersection which is already very busy will impact things badly. Further you also know that visitors,

vendors, delivery trucks etc. will park on side streets already heavily impacted. On 6th Street, where

my properties are, parking is so bad that residents have resorted to parking restrictions as well as using

the front of their properties to park.

The neighborhood density has increased dramatically in the last few years with the construction and

consequent success of the GROVE. That success has brought in dozens of large residential developments.

Non of those have been this tall or concentrated and that has worked in keeping the nature of this area

reasonable and livable.

Without going to details on other areas impacted, I would like to suggest that the project be reduced

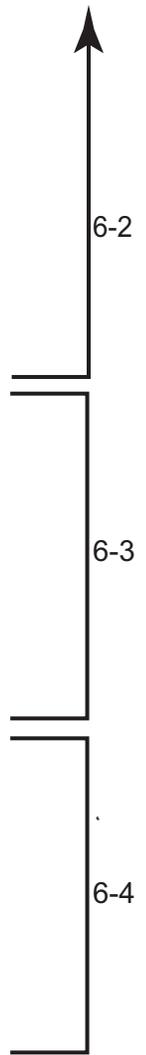
to the proposal that would cut the number of units by 1/3 (100). This proposal would give the owner

a substantial increase in income while capping the density and size to a more reasonable fit with the

neighborhood.

Sincerely

Joseph Blum



**LETTER NO. 6**

Joseph Blum  
1753 Orchid Avenue  
Los Angeles, CA 90028  
[jblumre@gmail.com](mailto:jblumre@gmail.com)

**Comment No. 6-1**

The EIR on the project above is impressive, but does not change my position by much.

The size of the proposed development is daunting and not fitting the neighborhood. This is more density than the neighborhood can bear from all angles (traffic, parking, quality of life, pollution visual clutter etc.).

I understand the need for the owner to get more income from this property and the fact that the zoning probably permit much higher use that is there now. However fail to see the need to make it this large and more importantly I fail to see that the City would want to allow such dense development in this neighborhood.

**Response to Comment No. 6-1**

The Draft EIR addressed potential aesthetic impacts, including visual character, in Section IV.B, Aesthetics. As discussed in the Draft EIR, page IV.B-7, the proposed project would replace a surface parking lot and a one-story bank building with a new, contemporary building that is visually compatible with the several newer or recently renovated high rise buildings in the vicinity of the project site. The area is slowly undergoing redevelopment to create a more dynamic landscape and skyline reflective of the scale of Wilshire Boulevard as a major transportation and activity corridor. In addition, the townhomes to be located on the northwestern portion of the site are similar in scale to the existing residential uses which abut Wilshire Boulevard and line Orange Street. The townhouses serve as a transition between uses. Implementation of the proposed project would include the replacement of street trees along Crescent Heights and Wilshire Boulevards. These proposed streetscape features would enhance the visual character of the site and immediate area and the impacts would be beneficial. The proposed project does not distract from the unique image of other buildings in the area, but rather complements other uses. The proposed structure would be a modern building with a stepped design to minimize the massing of the structure. The building, as designed, is modern in style and is intended to lend a complementary, yet distinct, commercial character which would be integrated into the Wilshire Boulevard street frontage, as well as the overall project design.

The Draft EIR addressed potential density impacts in Section IV.H, Land Use. As discussed in the Draft EIR, page IV.H-21, the proposed project is a mixed use development on a site zoned C4 and R3 and designated as a Regional Center. In accordance with Section 12.22.A18.a of the City of Los Angeles Planning and Zoning Code, because the project site is located within the “Regional Center Commercial”

land use designation, the proposed project's residential density on the southern portion of the site is governed by the R5 zone standards. Per Section 12.12 C 4 (c), the R5 zone requires a minimum of 200 square feet of lot area per dwelling unit. A maximum total of 194 residential units could be constructed on the C4 portion of the site and a maximum of five units could be constructed on the R3 portion of the site. The proposed project would provide a total of 158 residential (condominium) units and four stand alone townhouse units. Therefore, the proposed project is consistent with residential zoning density requirements and impacts would be less than significant.

### **Comment No. 6-2**

They are proposing excellent parking for the building but you know that adding busy driveways to this intersection which is already very busy will impact things badly. Further you also know that visitors, vendors, delivery trucks etc. will park on side streets already heavily impacted. On 6th Street, where my properties are, parking is so bad that residents have resorted to parking restrictions as well as using the front of their properties to park.

### **Response to Comment No. 6-2**

The results of the analyses indicate that the proposed project could potentially result in significant traffic impacts at three of the 11 study intersections during one or both peak hours; at 6th Street and Fairfax Avenue (PM peak hour), at Wilshire Boulevard and Crescent Heights Boulevard/McCarthy Vista (AM peak hour), and at Wilshire Boulevard and Fairfax Avenue (both peak hours). The Draft EIR acknowledges significant and unavoidable impacts from these impacts. This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

As discussed in the Draft EIR, page IV.L-44, the project proposes to provide the 432 required number of parking spaces. The project would conform to all applicable parking requirements, and no significant off site parking impacts or "overflow" parking into any of the adjoining residential neighborhoods is anticipated, and impacts would be less than significant.

### **Comment No. 6-3**

The neighborhood density has increased dramatically in the last few years with the construction and consequent success of the GROVE. That success has brought in dozens of large residential developments. None of those have been this tall or concentrated and that has worked in keeping the nature of this area reasonable and livable.

### **Response to Comment No. 6-3**

With respect to impacts related to neighborhood character and density, please see Response to Comment 5-1. In addition, as discussed in the Draft EIR, page IV.B-8, to reduce the effects of massing of the

proposed structure, the residential portion of the project (levels 5-21) would be provided in a 17-story residential tower (including a roof top garden and lounge level) set above the four-story podium parking. The tower element would be located along Wilshire and approximately 35 feet from the residences to the north. The building will be highly modulated with breaks and shifts in the massing and the visual impact of all exterior louvers, vent grills and other non-ornamental features will be limited.

**Comment No. 6-4**

Without going to details on other areas impacted, I would like to suggest that the project be reduced to the proposal that would cut the number of units by 1/3 (100). This proposal would give the owner a substantial increase in income while capping the density and size to a more reasonable fit with the neighborhood.

**Response to Comment No. 6-4**

The Draft EIR discussed project alternatives, including Alternative 2: Reduced Height and Density Alternative, in Section VI, Alternatives. As discussed in the Draft EIR, page VI-8, the Reduced Height and Density Alternative would provide approximately 100 residential units (not including the four townhouses), and approximately 5,130 square feet of ground floor retail space. Implementation of Alternative 2 would result in some of the same environmental impacts associated with the proposed project. Additionally, this alternative would not satisfy many of the project objectives as fully as the proposed project, including creating more housing and employment opportunities. Although Alternative 2 is considered to be the environmentally superior alternative since it would have a lesser impacts in general due to its reduced size, the Reduced Height and Density Alternative would still result in the same significant and unavoidable shade/shadow impacts and some of the same traffic impacts as the proposed project. This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

6227 Warner Drive  
Los Angeles, CA 90048  
August 17, 2009

RECEIVED  
CITY OF LOS ANGELES

AUG 19 2009

ENVIRONMENTAL  
UNIT

JimmyLiao  
EIR Unit  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA90012

Re: EIR Case No. ENV-2008-0729-EIR

Dear Mr. Liao,

I have long opposed the plan for a 21 story, multi-use building at the corner of Wilshire and Crescent Heights. The additional congestion in an area that is overly-congested now is the prime reason, as we residents have to struggle already with a vast amount of traffic and noise. An additional 432 cars is inconceivable! Air quality will worsen, too. Then there is the issue of a high-rise casting shade/shadow.

Please add my voice to those who oppose this plan.

Sincerely,

  
Carolyn Brown

7-1

**LETTER NO. 7**

Carolyn Brown  
6227 Warner Drive  
Los Angeles, CA 90048

**Comment No. 7-1**

I have long opposed the plan for a 21 story, multi-use building at the corner of Wilshire and Crescent Heights. The additional congestion in an area that is overly-congested now is the prime reason, as we residents have to struggle already with a vast amount of traffic and noise. An addition 432 cars is inconceivable! Air quality will worsen, too. Then there is the issue of a high-rise casting shade/shadow.

**Response to Comment No. 7-1**

The Draft EIR analyzes impacts to traffic, noise, and aesthetics, proposed mitigation where feasible, and acknowledges significant and unavoidable impacts with respect to traffic at three area intersections, temporary construction noise, and winter shade and shadows. The comment does not identify a specific flaw of the Draft EIR and expresses opinions about the project. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**From:** Christine Scotti <christine@scottidesigngroup.com>  
**To:** <jimmy.liao@lacity.org>  
**Date:** 8/25/2009 5:19 PM  
**Subject:** ENV-2008-0729-EIR (Wilshire Crescent Heights) Proposed Development

Dear Mr. Liao,

I am writing in reference to the proposed development located at 652-685 1/2 S. Crescent Heights Blvd and 6233-6245 W. Wilshire Boulevard, Los Angeles. I am a resident of the neighborhood where this proposed development will be located and I am writing to voice my opposition to this development.

8-1

I reside on the north side of Orange Street and we are already dealing with significant noise and vibration levels and traffic and transportation as a result of the inadequate parking lot design of the 99 cent store located on Wilshire Blvd, and the newly built seven floor condominium/retail space at the southwest corner of Fairfax Ave and Orange St. It is very frustrating dealing with the current traffic issues due to people trying to get in and out of the 99 cent store since the back entrances to the store are located on Orange St. There is a constant, significant back-up during the morning and afternoon rush hours. From my understanding, although I have not witnessed it, there have been several accidents at the end of our street as well.

8-2

Residents of Orange Street that are traveling in both the east and west directions are subjected to significant delays in gaining access to and from our street because the inadequate parking lot design, which does not have a pass through, requires people to back in and out of one side of the lot thereby trapping anyone who is trying to travel up or down Orange St.

The new retail/condominium structure that is located at the corner of Fairfax Ave/Orange St adds to the congestion as residents of that building try and exit from or gain access to their garage. I don't know if you are aware, but the structure currently has no retail tenants and it's occupancy rate for the condominiums is at a mere 15-20%. Once retail business occupy the ground floor and the occupancy rate increases, it is truly going to be a nightmare getting in and out of the east end of our street.

8-3

Additionally, our street is constantly used as a "cut-through" for people trying to avoid the traffic congestion at the Fairfax Ave/Wilshire Blvd and Crescent Heights Blvd/Wilshire Blvd intersections. We deal with an influx of cars going up and down our street on a daily basis - most with no regard for the speed limit and at all hours of the day - morning to evening. We have requested, on several occasions that a traffic study be done and speed bumps be installed in order to help with the situation, but we yet to have any resolution to this problem.

8-4

The addition of the proposed Wilshire/Crescent Heights development would not only create a massive increase in traffic and transportation, noise levels and vibration levels on our street, but it also adds to the ever-growing urban blight in this area. The approval of this development would be devastating to the residents. It would create the same blockage/back-up on the west end of the street, that we are already dealing with on the east end of the street.

8-5

I ask that the city make it a point to visit this area and see for themselves what we are dealing with. Will a public hearing be held for this proposed development? I, and many residents on this street, would like to participate and voice our opposition.

8-6

I thank you in advance for your attention.

Best,  
Christine Scotti  
6151 Orange Street, #316  
Los Angeles, CA 90048

**LETTER NO. 8**

Christine Scotti  
6151 Orange Street, #316  
Los Angeles, CA 90048  
Christine@scottidesigngroup.com

**Comment No. 8-1**

I am writing in reference to the proposed development located at 652-685 1/2 S. Crescent Heights Blvd and 6233-6245 W. Wilshire Boulevard, Los Angeles. I am a resident of the neighborhood where this proposed development will be located and I am writing to voice my opposition to this development.

**Response to Comment No. 8-1**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**Comment No. 8-2**

I reside on the north side of Orange Street and we are already dealing with significant noise and vibration levels and traffic and transportation as a result of the inadequate parking lot design of the 99 cent store located on Wilshire Blvd, and the newly built seven floor condominium/retail space at the southwest corner of Fairfax Ave and Orange St. It is very frustrating dealing with the current traffic issues due to people trying to get in and out of the 99 cent store since the back entrances to the store are located on Orange St. There is a constant, significant back-up during the morning and afternoon rush hours. From my understanding, although I have not witnessed it, there have been several accidents at the end of our street as well.

Residents of Orange Street that are traveling in both the east and west directions are subjected to significant delays in gaining access to and from our street because the inadequate parking lot design, which does not have a pass through, requires people to back in and out of one side of the lot thereby trapping anyone who is trying to travel up or down Orange St.

**Response to Comment No. 8-2**

The Draft EIR discussed noise and vibration impacts in Section IV.I, Noise. As discussed in the Draft EIR, page IV.I-7, ambient daytime noise levels listed in Table IV.I-4 are characteristic of a typical urban environment. The greatest regular source of groundborne vibration at the project site and immediate vicinity is from roadway truck and bus traffic. Regarding traffic conditions on residential streets in the project vicinity, an additional analysis was conducted on Orange Street to determine the potential for project impacts on the segments of La Jolla Avenue between 6th Street and Wilshire Boulevard, and

along Orange Street adjacent to the project site, and to the west of Crescent Heights Boulevard. Results of this analysis are shown in Table IV.L-8 of the Draft EIR. The analysis showed that there would be no significant impact to Orange Street from the project.

This comment addresses an existing condition in the study vicinity that is not associated with or under the control of the proposed project itself, nor does the comment state a concern or question regarding the adequacy of the analysis in the Draft EIR. However, the project applicant has met with residents of Orange Street to discuss the issue raised in the comment, and has volunteered to work with the community, LADOT, and the local Council Office to identify potential measures to address the concerns noted.

### **Comment No. 8-3**

The new retail/condominium structure that is located at the corner of Fairfax Ave/Orange St adds to the congestion as residents of that building try and exit from or gain access to their garage. I don't know if you are aware, but the structure currently has no retail tenants and it's occupancy rate for the condominiums is at a mere 15-20%. Once retail business occupy the ground floor and the occupancy rate increases, it is truly going to be a nightmare getting in and out of the east end of our street.

### **Response to Comment No. 8-3**

The analysis in the Draft EIR included consideration of traffic contributed by the above-described building, assuming that the building is fully occupied. The traffic study assumes completion and full occupancy of the proposed project as well as all related projects. This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

### **Comment No. 8-4**

Additionally, our street is constantly used as a "cut-through" for people trying to avoid the traffic congestion at the Fairfax Ave/Wilshire Blvd and Crescent Heights Blvd/Wilshire Blvd intersections. We deal with an influx of cars going up and down our street on a daily basis - most with no regard for the speed limit and at all hours of the day - morning to evening. We have requested, on several occasions that a traffic study be done and speed bumps be installed in order to help with the situation, but we yet to have any resolution to this problem.

### **Response to Comment No. 8-4**

Existing conditions are presented in the Draft EIR and used as the baseline for the analysis. Observations of the study area indicate that existing traffic congestion throughout the area, particularly during peak commute traffic periods on Wilshire Boulevard, 6th Street, Crescent Heights Boulevard, and Fairfax Avenue result in high utilization of many of the local/residential streets in the area by commuters and

local residents seeking to avoid long delays. The anticipated increases in area traffic resulting from both ambient traffic growth and proposed new development are expected to exacerbate this “cut through” traffic, and it is likely that some project visitors, patrons, and/or employees will themselves use some of the area residential streets as alternative travel routes to and from the project site.

Therefore, an analysis was conducted to determine the potential for project impacts on the segments of La Jolla Avenue between 6th Street and Wilshire Boulevard, and along Orange Street adjacent to the project site, and to the west of Crescent Heights Boulevard. Results of this analysis are shown in Table IV.L-8 of the Draft EIR. The analysis showed that there would be no significant impact to Orange Street from the project. Please refer also to Response to Comment No. 7-2.

This comment requests that the City prepare a study for a perceived existing problem and does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

#### **Comment No. 8-5**

The addition of the proposed Wilshire/Crescent Heights development would not only create a massive increase in traffic and transportation, noise levels and vibration levels on our street, but it also adds to the ever-growing urban blight in this area. The approval of this development would be devastating to the residents. It would create the same blockage/back-up on the west end of the street, that we are already dealing with on the east end of the street.

#### **Response to Comment No. 8-5**

As shown in Table IV.L-6 of the Draft EIR, project traffic will generally result in only nominal increases in area intersection operations. The project’s proposed retail and other commercial components will provide local-serving facilities within convenient walking distance of the existing nearby neighborhoods. The ability of area residents to conveniently walk to nearby retail establishments also reduces vehicle traffic not only to and from the site, but throughout the area, as area residents would not need to drive to other stores. In addition, Wilshire Boulevard is well served by transit.

As discussed in the Draft EIR, page IV.I-18, the proposed project would have a less than significant impact with respect to noise generated as a result of the operation of the proposed parking facilities, off-site vehicular noise resulting from traffic generated by the project, and other on-site non-vehicular noise generated by operation of the proposed project, such as rooftop heating, ventilation, and air conditioning (HVAC).

With respect to the comment regarding urban blight, the Draft EIR addressed potential aesthetic impacts, including visual character, in Section IV.B, Aesthetics. As discussed in the Draft EIR, page IV.B-7, the proposed project would replace a surface parking lot and a one-story bank building with a new, contemporary building that is visually compatible with the several newer or recently renovated high rise

buildings in the vicinity of the project site. The area is slowly undergoing redevelopment to create a more dynamic landscape and skyline reflective of the scale of Wilshire Boulevard as a major transportation and activity corridor. In addition, the townhomes to be located on the northwestern portion of the site are similar in scale to the existing residential uses which abut Wilshire Boulevard and line Orange Street. The townhouses serve as a transition between uses. Implementation of the proposed project would include the replacement of street trees along Crescent Heights and Wilshire Boulevards. These proposed streetscape features would enhance the visual character of the site and immediate area and the impacts would be beneficial. The proposed project does not distract from the unique image of other buildings in the area, but rather complements other uses. The proposed structure would be a modern building with a stepped design to minimize the massing of the structure. The building, as designed, is modern in style and is intended to lend a complementary, yet distinct, commercial character which would be integrated into the Wilshire Boulevard street frontage, as well as the overall project design.

**Comment No. 8-6**

I ask that the city make it a point to visit this area and see for themselves what we are dealing with. Will a public hearing be held for this proposed development? I, and many residents on this street, would like to participate and voice our opposition.

**Response to Comment No. 8-6**

As discussed in Section I, Introduction/Summary, public hearings on the proposed project will be held after completion of the Final EIR. Notice of the time and location will be published prior to the public hearing date. This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**From:** "Vinnick, Jeffrey" <jvinnick@hbblaw.com>  
**To:** <jimmy.liao@Lacity.org>  
**CC:** <av918@aol.com>, "flo vinnick" <flovinnick@yahoo.com>  
**Date:** 8/26/2009 2:38 PM  
**Subject:** Opposition to Proposed Development at 652-658 1/2 S. Crescent Heights  
**Attachments:** \_hbbligo.jpg; 3581676\_1.pdf

Dear Mr. Liao,

Attached is my response to your August 13, 2009 letter concerning the proposed development at the above-referenced address. Please make my letter part of the record on this matter.

Thank you.

Jeffrey Vinnick

<<http://www.hbblaw.com/>> Haight Brown & Bonesteel LLP  
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9-1

Haight Brown & Bonesteel LLP



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Jeffrey A. Vinnick  
jvinnick@hbblaw.com

August 26, 2009

**VIA EMAIL AND U.S. MAIL**

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

Re: 652-685 1/2 S. Crescent Heights Boulevard and 6233-6245 W.  
Wilshire Boulevard

Dear Mr. Liao:

I am the owner and occupant of a four unit apartment building located at 6326 Orange Street. My building is located one-half block from the "project site." I am writing again to vigorously oppose the proposed development of a 21-story residential tower at the corner of Crescent Heights and Wilshire Boulevard. Though I believe landowners should have the right to develop their property, the proposed use is not compatible with the character and use of the neighborhood.

9-2

As stated in your August 13, 2009 letter, the proposed project will result in significant and unavoidable environmental impacts. Notably, traffic at the subject intersection is already severely congested between the hours of 7:00 a.m. and 7:00 p.m., Monday through Saturday. During the week, cars are backed up as far south as Olympic Boulevard. I often see cars travelling north on Crescent Heights block the intersection at Crescent Heights and Olympic Boulevard because of the congestion going north on Crescent Heights. The additional number of vehicles anticipated with the proposed development will adversely affect safety and the quality of life of those residents, such as myself, who drive through the intersection multiple times each day.

9-3

Jimmy Liao

August 26, 2009

Page 2

As you are undoubtedly aware, another large residential building has been planned for the northwest corner of Wilshire Boulevard and La Jolla. This second proposed new development is only one block west from the development site. That building, in addition to the one planned for the northeast corner of Wilshire Boulevard and Crescent Heights, in my opinion, will make it impossible to take reasonable steps to mitigate the adverse impact of traffic and the strain on already limited resources such as police and fire suppression services.

9-4

The neighborhood around the development site is served by limited resources that could have potentially mitigated the adverse impact on traffic resulting from the increase in persons residing in the area. For example, there is no grocery store within walking distance from the intersection of Crescent Heights and Wilshire Boulevard. Residents, such as me, have no choice but to use their vehicles to run errands. Moreover, I have reviewed the DEIR and, based thereon, believe that the proposed height of the building will cause the neighborhood north of the development site to be cast in darkness most of the day adversely affecting the quality of life for those residing on the streets north of the proposed structure.

9-5

The area around the proposed development site is truly a neighborhood. Residents know their neighbors and take great pride in their property as evidenced by the condition of the apartment buildings and single family residences and their landscaping. The character of the neighborhood around the development site should be preserved to ensure that future residents will enjoy the unique character and charm of the historically significant area. Therefore, I respectfully request that the proposed residential tower be no higher than any other building presently at the subject intersection and that the footprint of the building allow for sufficient set-back so as not to change the character of the intersection.

9-6

If you and your colleagues are inclined to approve the planned development, I suggest that the landowners be required to “give back” to the community by paying for traffic abatement measures (if any such measures are feasible) and supporting the police and fire departments who are responsible for protecting the neighborhood.

9-7

Haight Brown & Bonesteel LLP

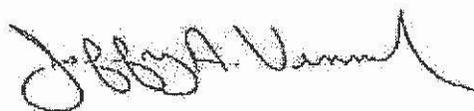
Jimmy Liao

August 26, 2009

Page 3

Thank you for your consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jeffrey A. Vinnick". The signature is written in a cursive style with a large, looping initial "J".

Jeffrey A. Vinnick  
Haight Brown & Bonesteel LLP

JAV

**LETTER NO. 9**

Jeffrey Vinnick, Attorney  
Haight Brown & Bonesteel LLP  
6080 Center Drive, Suite 800  
Los Angeles, CA 90045-1574  
jvinnick@hbblaw.com

**Comment No. 9-1**

Attached is my response to your August 13, 2009 letter concerning the proposed development at the above-referenced address. Please make my letter part of the record on this matter.

**Response to Comment No. 9-1**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**Comment No. 9-2**

I am the owner and occupant of a four unit apartment building located at 6326 Orange Street. My building is located one-half block from the "project site." I am writing again to vigorously oppose the proposed development of a 21-story residential tower at the corner of Crescent Heights and Wilshire Boulevard. Though I believe landowners should have the right to develop their property, the proposed use is not compatible with the character and use of the neighborhood.

**Response to Comment No. 9-2**

The Draft EIR discussed land use compatibility in Section IV.H, Land Use. As discussed in the Draft EIR, page IV.H-25, the proposed project would result in no significant impacts with respect to land use compatibility. The proposed project's commercial uses would be located along a portion of Wilshire Boulevard that is commercially zoned, designated as Regional Center Commercial under the Community Plan, and is dominated by commercial uses. The proposed building would have varying setbacks at different levels to reduce the impact of the height of the structure to existing structures on Orange Street. Moreover, the mass of the tower is concentrated toward Wilshire Boulevard and away from Orange Street. Further, it is not uncommon to locate multi-family structures adjacent to commercial uses. Examples of this mix are currently found nearby along Santa Monica Boulevard and on Wilton Place. Therefore, there are no impacts identified with placement of project uses in relation to the existing surrounding uses of the project site.

**Comment No. 9-3**

As stated in your August 13, 2009 letter, the proposed project will result in significant and unavoidable environmental impacts. Notably, traffic at the subject intersection is already severely congested between the hours of 7:00 a.m. and 7:00 p.m., Monday through Saturday. During the week, cars are backed up as far south as Olympic Boulevard. I often see cars travelling north on Crescent Heights block the intersection at Crescent Heights and Olympic Boulevard because of the congestion going north on Crescent Heights. The additional number of vehicles anticipated with the proposed development will adversely affect safety and the quality of life of those residents, such as myself, who drive through the intersection multiple times each day.

**Response to Comment No. 9-3**

The Draft EIR included an analysis of cumulative impacts and identified the future levels of service at the study intersections for both the without project and with project scenarios, as well as the potential incremental project traffic impacts at each location. The results of the analyses indicate that the proposed project could potentially result in significant traffic impacts at three of the 11 study intersections during one or both peak hours: 6th Street and Fairfax Avenue (PM peak hour); Wilshire Boulevard and Crescent Heights Boulevard/McCarthy Vista (AM peak hour); and Wilshire Boulevard and Fairfax Avenue (both peak hours). The Draft EIR acknowledges significant and unavoidable impacts from these impacts. This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA.

**Comment No. 9-4**

As you are undoubtedly aware, another large residential building has been planned for the northwest corner of Wilshire Boulevard and La Jolla. This second proposed new development is only one block west from the development site. That building, in addition to the one planned for the northeast corner of Wilshire Boulevard and Crescent Heights, in my opinion, will make it impossible to take reasonable steps to mitigate the adverse impact of traffic and the strain on already limited resources such as police and fire suppression services.

**Response to Comment No. 9-4**

Related project no. 38 is located at 6411 Wilshire Boulevard and consists of 130 apartment dwelling units. This related project, along with 52 others, was incorporated into the traffic analysis and is reflected in Table IV.L-6. As discussed in the Draft EIR, page IV.L-53, in order to present the most conservative assessment of the potential effectiveness of the proposed left-turn mitigation measure at 6<sup>th</sup> Street and Fairfax Avenue, the project's impacts at this location is considered to remain significant and unavoidable. Similarly, as no feasible mitigation is available for the project's potential significant impacts at Wilshire Boulevard and Crescent Heights Boulevard/McCarthy Vista, or at Wilshire Boulevard and Fairfax Avenue, the impacts at these two locations would also remain significant and unavoidable. Although the

project will prepare and implement appropriate trip-reduction strategies and programs to the satisfaction of LADOT, the effects of the TDM program are not considered to fully mitigate any of the three significant impacts identified above. However, it is noted in LADOT's traffic impact assessment letter, dated May 5, 2009, that the project's traffic impacts were analyzed without benefit of potential TDM-related trip reductions, and as such, LADOT identifies that the project's traffic impacts described in the traffic study are over-stated.

The Draft EIR discussed police and fire impacts in Section IV.K, Public Services. The proposed project's contribution to cumulative fire protection service impacts is discussed in the Draft EIR, page IV.K-7. Similar to the proposed project, each of the 26 related projects that would be served by the LAFD would be individually subject to LAFD review and would be required to comply with all applicable construction-related and operational fire safety requirements of the LAFD and the City of Los Angeles in order to adequately mitigate fire protection impacts. Each of the related projects is also individually subject to LAFD review and would be required to comply with all applicable fire safety requirements to adequately mitigate fire protection impacts. If any of the related projects would create demands on fire protection staffing, equipment, or facilities such that a new station would be required, potential environmental impacts would be addressed in conjunction with the environmental review for that project. The proposed project and related projects could potentially increase city tax revenues, a portion of which could be used to fund new fire facilities or personnel. Therefore, the proposed project would not have a cumulatively considerable incremental effect on fire protection services and the proposed project and related projects' cumulative impact would be less than significant.

The proposed project's contribution to police protection service impacts is discussed in the Draft EIR, page IV.K-14. The proposed project, combined with the 26 related projects located within the Wilshire Community Police Station service area, would result in an increase in residents and employees needing police services. Any new or expanded police station would be funded via existing mechanisms (i.e., sales taxes, government funding) to which the proposed project and related projects would contribute. Similar to the proposed project, each of the related projects would be individually subject to LAPD review, and would be required to comply with all applicable security requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. The proposed project would not incrementally contribute to the cumulative demand for police protection services and is therefore not cumulatively considerable; impacts would be less than significant.

#### **Comment No. 9-5**

The neighborhood around the development site is served by limited resources that could have potentially mitigated the adverse impact on traffic resulting from the increase in persons residing in the area. For example, there is no grocery store within walking distance from the intersection of Crescent Heights and Wilshire Boulevard. Residents, such as me, have no choice but to use their vehicles to run errands. Moreover, I have reviewed the DEIR and, based thereon, believe that the proposed height of the building will cause the neighborhood north of the development site to be cast in darkness most of the day adversely affecting the quality of life for those residing on the streets north of the proposed structure.

**Response to Comment No. 9-5**

With respect to the comment regarding project traffic please see Response to Comment No. 8-3. Regarding shade/shadow, the Draft EIR acknowledges significant and unavoidable shade/shadow impacts on three abutting residential buildings during the winter when the sun is low in the sky. No buildings would be significantly impacted in the summer. . The comment does not identify a specific flaw of the Draft EIR.

**Comment No. 9-6**

The area around the proposed development site is truly a neighborhood. Residents know their neighbors and take great pride in their property as evidenced by the condition of the apartment buildings and single family residences and their landscaping. The character of the neighborhood around the development site should be preserved to ensure that future residents will enjoy the unique character and charm of the historically significant area. Therefore, I respectfully request that the proposed residential tower be no higher than any other building presently at the subject intersection and that the footprint of the building allow for sufficient set-back so as not to change the character of the intersection.

**Response to Comment No. 9-6**

With respect to impacts related to neighborhood character, the Draft EIR addressed potential aesthetic impacts, including visual character, in Section IV.B, Aesthetics. As discussed in the Draft EIR, page IV.B-7, the proposed project would replace a surface parking lot and a one-story bank building with a new, contemporary building that is visually compatible with the several newer or recently renovated high rise buildings in the vicinity of the project site. The area is slowly undergoing redevelopment to create a more dynamic landscape and skyline reflective of the scale of Wilshire Boulevard as a major transportation and activity corridor. In addition, the townhomes to be located on the northwestern portion of the site are similar in scale to the existing residential uses which abut Wilshire Boulevard and line Orange Street. The townhouses serve as a transition between uses. Implementation of the proposed project would include the replacement of street trees along Crescent Heights and Wilshire Boulevards. These proposed streetscape features would enhance the visual character of the site and immediate area and the impacts would be beneficial. The proposed project does not distract from the unique image of other buildings in the area, but rather complements other uses. The proposed structure would be a modern building with a stepped design to minimize the massing of the structure. The building, as designed, is modern in style and is intended to lend a complementary, yet distinct, commercial character which would be integrated into the Wilshire Boulevard street frontage, as well as the overall project design.

As set forth in Section IV.D, Cultural Resources, of the Draft EIR, the Carthay Circle neighborhood located 300 feet to the south of the project site is a designated Historic Preservation Overlay Zone (HPOZ). The area to the north of Wilshire, including the project site, is not so designated. Therefore, contrary to the comment, the project would not impact a historically significant area. Additionally, the proposed project, at 255 feet at its highest point, would be shorter in height than 6300 Wilshire (located on the

southwest corner of the intersection). The 6300 Wilshire building is 307 feet high or 50 feet higher than the proposed project.

The Draft EIR addressed potential density impacts in Section IV.H, Land Use. As discussed in the Draft EIR, page IV.H-21, the proposed project is a mixed use development on a site zoned C4 and R3 and designated as a Regional Center. In accordance with Section 12.22.A18a of the City of Los Angeles Planning and Zoning Code, because the project site is located within the “Regional Center Commercial” land use designation, the proposed project’s residential density on the southern portion of the site is governed by the R5 zone standards. Per Section 12.12 C 4 (c), the R5 zone requires a minimum of 200 square feet of lot area per dwelling unit. Under the existing zoning, a maximum total of 194 residential units could be constructed on the C4 portion of the site and a maximum of five units could be constructed on the R3 portion of the site. The proposed project would provide a total of 158 residential units and four stand alone townhouse units. Therefore, the proposed project is consistent with residential zoning density requirements and impacts would be less than significant. This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**Comment No. 9-7**

If you and your colleagues are inclined to approve the planned development, I suggest that the landowners be required to "give back" to the community by paying for traffic abatement measures (if any such measures are feasible) and supporting the police and fire departments who are responsible for protecting the neighborhood.

**Response to Comment No. 9-7**

The Draft EIR discussed mitigation measures for potential traffic impacts in Section IV.L, Traffic/Transportation. The area roadway system is currently substantially improved, and there are few available rights-of-way or unimproved roadway segments with which to construct any meaningful new roadway or intersection capacities. Additionally, the area traffic signal network has already been upgraded with both the ATSAC and second-generation ATCS signal coordination systems, and no additional signal operation enhancements are available. Therefore, potential mitigation measures for this project are relegated to operational improvements based on the forecast traffic demand patterns, such as converting the operations of existing lanes to better accommodate future travel patterns, or the addition of short turn lanes to improve “through” traffic movements at the intersections, where feasible. As discussed in the Draft EIR, page IV.L-52, the only feasible improvement identified to mitigate the project’s impacts is Mitigation Measure L-1, which requires the project applicant to contribute to the installation of southbound left-turn phasing at the 6<sup>th</sup> Street and Fairfax Avenue intersection.

The Draft EIR studied traffic impacts on local streets and concluded that the project would not result in a significant impact. Nonetheless, the applicant has volunteered to work with the community, LADOT, and

the local Council Office to identify potential measures to address residents' concerns regarding cut through traffic.

As discussed in Section IV.K, Public Services, the proposed project could potentially increase city tax revenues, a portion of which could be used to fund new fire facilities or personnel and any new or expanded police station would be funded via existing mechanisms (i.e., sales taxes, government funding) to which the proposed project would contribute.

**From:** <CathieLipp@aol.com>  
**To:** <jimmy.liao@lacity.org>  
**Date:** 9/24/2009 7:52 AM  
**Subject:** Opposed to project

\_jimmy.liao@lacity.org\_ (mailto:jimmy.liao@lacity.org) . RE: Wilshire  
Crescent Development (ERI#ENV-20080729-EIR)-

Dear Mr. Liao,

I am against the building of this project. Even the city's environmental  
evaluation does not give it adequately high grades to warrant its building  
at the expense of the residents of the neighborhood.

Please know that many of us are watching what is trying to be foisted on  
us, and we do not appreciate it.

Cathie Kamin  
353 N. Kings Rd  
Los Angeles, 90048



10-1

**LETTER NO. 10**

Cathie Kamin  
353 N. Kings Road  
Los Angeles, CA 90048  
Cathielipp@aol.com

**Comment No. 10-1**

I am against the building of this project. Even the city's environmental evaluation does not give it adequately high grades to warrant its building at the expense of the residents of the neighborhood.

Please know that many of us are watching what is trying to be foisted on us, and we do not appreciate it.

**Response to Comment No. 10-1**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**From:** Lenore Sachs <lenoresachs@sbcglobal.net>  
**To:** <jimmy.liao@lacity.org>  
**Date:** 9/24/2009 10:54 AM  
**Subject:** Wilshire/Crescent Project -----

ERI -# ENV 2008 -0729

Dear Mr. Liao,

I am writing to register my opposition to the height of the building being planned for the intersection of Wilshire Blvd. and Crescent Heights Blvd. It will surely be a nightmare for the residential community there who are suffering right now from heavy traffic congestion. What the resulting traffic will look like if the plans for the building are not scaled down is anyone's guess. I would only venture to say that it would be full-time gridlock. And who would benefit from that? Not the developers and not the public. This is the time for serious negotiation to solve this huge problem before the project gets off the drawing boards and starts to become a reality on the ground. Hoping there is a solution to be found that will satisfy both the developers and the local residential community, I am sincerely yours, Lenore Levine Sachs. -

11-1

**LETTER NO. 11**

Lenore Sachs

[lenoresachs@sbcglobal.net](mailto:lenoresachs@sbcglobal.net)

**Comment No. 11-1**

I am writing to register my opposition to the height of the building being planned for the intersection of Wilshire Blvd. and Crescent Heights Blvd. It will surely be a nightmare for the residential community there who are suffering right now from heavy traffic congestion. What the resulting traffic will look like if the plans for the building are not scaled down is anyone's guess. I would only venture to say that it would be full-time gridlock. And who would benefit from that? Not the developers and not the public. This is the time for serious negotiation to solve this huge problem before the project gets off the drawing boards and starts to become a reality on the ground. Hoping there is a solution to be found that will satisfy both the developers and the local residential community, I am sincerely yours, Lenore Levine Sachs.

**Response to Comment No. 11-1**

The General Plan Framework designates the project site as Regional Center. The Framework calls for development in Regional Centers with highrise structures with floor area ratios of between 1.5:1 and 6.0:1. The floor area ratio of 3.0:1 on the Lot 19 (the smaller portion of the site zoned [Q]R3-1-O) and 4.5:1 on Lots 15-18 (the majority of the site which is zoned [Q]C4-2D-O and fronts Wilshire Boulevard) is within the Framework Element's envisioned floor area ratio for this type of development. Moreover these densities are consistent with zoning/height district density requirements, and impacts would be less than significant.

The Draft EIR included an analysis of traffic impacts. As shown in Table IV.L-6 of the Draft EIR, project traffic will generally result in only nominal increases in area intersection operations. However, the results of the analysis does indicate that the proposed project could potentially result in significant traffic impacts at three intersections in the project vicinity during one or both peak hours: 6th Street and Fairfax Avenue (PM peak hour); Wilshire Boulevard and Crescent Heights Boulevard/McCarthy Vista (AM peak hour); and Wilshire Boulevard and Fairfax Avenue (both peak hours). Therefore, potential mitigation measures have been incorporated into this project.

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**From:** Douglas Jefferson <dougjdnj@yahoo.com>  
**To:** <jimmy.liao@lacity.org>  
**Date:** 9/24/2009 12:56 PM  
**Subject:** wilshire crescent development

ERI#ENV-20080729-EIR

Dear Jimmy,

Whatever you can do to stop this project from happening would be a great benefit to this neighborhood. I have lived here for 25 years and have seen the neighborhood go from good to bad to worse, when it comes to the traffic, the homeless, the litter, and the lack of police support. The 99c store parking lot at the east end of Orange St. near Fairfax has only one egress and ingress. It has blocked up traffic on the block for years and no one will do anything about it because the owner is rich and doesn't care. Many fender benders take place and there is horn honking and hollering off and on throughout the day. When the cars do get free of the congestion they speed down the street toward Crescent Heights. We do not need anymore traffic in this area as it is already way to congested and you can't even find a place to park when you come home at night.

12-1

Recently there was a building built at the corner of Orange St. and Fairfax Ave. Six stories. First floor retail and five floors of condos. What a disaster. No retail has moved in on the ground level and to my knowledge only three units have been sold or rented in the entire building. Since they built it the air quality has gotten worse. Methane.

12-2

12-3

If I'm not mistaken the property at Wilshire and Crescent Heights used to be an old oil field years ago and is above a fault line.

12-4

There are plenty of places for people to move to in Los Angeles. Another high rise is not needed in an already overcrowded area.

12-5

This project is about one thing. Putting money into developers pockets.

Enough already.

Thanks for your help in stopping this project from happening.

Sincerely,  
Douglas Neal Jefferson  
323-936-2393

**LETTER NO. 12**

Douglas Jefferson  
dougjdnj@yahoo.com

**Comment No. 12-1**

Whatever you can do to stop this project from happening would be a great benefit to this neighborhood. I have lived here for 25 years and have seen the neighborhood go from good to bad to worse, when it comes to the traffic, the homeless, the litter, and the lack of police support. The 99c store parking lot at the east end of Orange St. near Fairfax has only one egress and ingress. It has blocked up traffic on the block for years and no one will do anything about it because the owner is rich and doesn't care. Many fender benders take place and there is horn honking and hollering off and on throughout the day. When the cars do get free of the congestion they speed down the street toward Crescent Heights. We do not need anymore traffic in this area as it is already way to congested and you can't even find a place to park when you come home at night.

**Response to Comment No. 12-1**

An additional analysis was conducted to determine the potential for project impacts on the segments of La Jolla Avenue between 6th Street and Wilshire Boulevard, and along Orange Street adjacent to the project site, and to the west of Crescent Heights Boulevard. Results of this analysis are shown in Table IV.L-8 of the Draft EIR. The analysis showed that there would be no significant impact to Orange Street from the project. Nonetheless, the applicant has volunteered to work with the community, LADOT, and the local Council Office to identify potential measures to address residents' concerns regarding cut through traffic.

The mixed-use tower portion of the project proposes to provide a total of 422 spaces within the six and one-half level parking structure, including the required 316 apartment resident spaces and 79 apartment guest spaces, plus a total of 27 commercial spaces. The four townhomes would provide 10 spaces. The project would conform to all applicable parking requirements, and no significant off site parking impacts or "overflow" parking into any of the adjoining residential neighborhoods is anticipated, and impacts would be less than significant.

**Comment No. 12-2**

Recently there was a building built at the corner of Orange St. and Fairfax Ave. Six stories. First floor retail and five floors of condos.

What a disaster. No retail has moved in on the ground level and to my knowledge only three units have been sold or rented in the entire building.

**Response to Comment No. 12-2**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**Comment No. 12-3**

Since they built it the air quality has gotten worse. Methane.

**Response to Comment No. 12-3**

This comment relates to a building constructed in the vicinity of the project. However, the project site is located within a High Potential Methane Zone. Methane soil gas testing was performed as part of the Phase II Environmental Assessment. According to the City of Los Angeles Methane Hazard and Methane Buffer Zone design criteria, the methane design level for the proposed project would be level 5. This design level calls for the highest amount of methane gas mitigation.

In Southern California, municipal governments have established design guidelines for real estate development in areas or “zones” potentially impacted by methane gas. The Los Angeles Department of Building and Safety (LADBS) in March 2004 issued the most comprehensive and proactive ordinance in California that deals with construction in the defined Methane Zones and Methane Buffer Zones within the City.

Mitigation measures are required for the project to ensure that the project shall implement all appropriate mitigation measures prescribed in the City of Los Angeles Methane Hazard and Methane Buffer Zone level 5 design criteria as found on pages 16 to 25 of the report. These mitigation measures would include, but not be limited to, passive and active mechanical venting systems, methane gas detection alarms, and impermeable membranes beneath the building. Impacts will be less than significant.

**Comment No. 12-4**

If I'm not mistaken the property at Wilshire and Crescent Heights used to be an old oil field years ago and is above a fault line.

**Response to Comment No. 12-4**

The zoning designation for the majority of the project site is [Q] C4-2D-O (Q Condition, Commercial, Height District No. 2, D Limitation, and Oil Drilling District). The “O” indicates that the project site is within an Oil Drilling District, a supplemental use district. This designation allows for the use of a controlled drill site. Historically oil was extracted in this area; however, there are no oil wells or oil production on the project site. The project site is not located within an Alquist-Priolo Earthquake Fault Zone. No known active faults are mapped as crossing the project site or projecting towards the project

site. The closest active fault to the project is the Newport-Inglewood fault which is located approximately 2.8 miles southeast of the project site.

**Comment No. 12-5**

There are plenty of places for people to move to in Los Angeles. Another high rise is not needed in an already overcrowded area.

This project is about one thing. Putting money into developers pockets.

**Response to Comment No. 12-5**

This comment states an opinion about the project and the developer and does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR.

**From:** "Mark J. Wakim, Esq." <mjw@wakimlaw.com>  
**To:** <Jimmy.Liao@LAcity.org>  
**Date:** 9/28/2009 7:57 AM  
**Subject:** Wilshire Crescent Heights - Resident Comment

Dear Jimmy:

I am a resident of the Beverly-Fairfax neighborhood and have the following comment about the Wilshire Crescent project.

The Wilshire corridor in the immediate vicinity of the proposed development has many buildings, department stores, large "anchor" stores, and even an entire office tower sitting empty. Those properties increasingly appear abandoned. There are many examples on the 6300/6200 blocks on Wilshire.

Furthermore, a very high proportion of residential units from 6th Street north to 3rd, and from San Vicente to Fairfax remain on the rental market for long periods of time.

How does the DEIR address the project's impact on these issues? I saw none specifically addressed in the DEIR.

In my opinion, the proposal would negatively impact the residential market and discourage development of existing buildings in the vicinity.

Yours truly,

Mark J. Wakim

Attorney at Law  
P.O. Box 481130  
Los Angeles, CA 90048  
(323) 617 4499

<mailto:mjw@wakimlaw.com> <mailto:mjw@wakimlaw.com > mjw@wakimlaw.com

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13-1

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**LETTER NO. 13**

Mark Wakim  
Attorney at Law  
P.O. Box 481130  
Los Angeles, CA 90048  
mjw@wakimlaw.com

**Comment No. 13-1**

I am a resident of the Beverly-Fairfax neighborhood and have the following comment about the Wilshire Crescent project.

The Wilshire corridor in the immediate vicinity of the proposed development has many buildings, department stores, large "anchor" stores, and even an entire office tower sitting empty. Those properties increasingly appear abandoned. There are many examples on the 6300/6200 blocks on Wilshire.

Furthermore, a very high proportion of residential units from 6th Street north to 3rd, and from San Vicente to Fairfax remain on the rental market for long periods of time.

How does the DEIR address the project's impact on these issues? I saw none specifically addressed in the DEIR.

In my opinion, the proposal would negatively impact the residential market and discourage development of existing buildings in the vicinity.

**Response to Comment No. 13-1**

Some of the issues raised by this comment express concern regarding economic and social conditions that are experienced by persons living today in high density urban areas such as the general area of the project. CEQA analysis is focused on impacts on the physical environment rather than economic or social conditions. Therefore, no analysis of economic issues is required or included in the Draft EIR. CEQA analysis itself is not intended as the sole tool for urban planning purposes.

September 28, 2009

Jimmy C. Liao, City Planner  
Department of City Planning  
200 North Spring Street, Room 750, City Hall  
Los Angeles, CA 90012  
VIA FACSIMILE 213/978-1343

EIR Case No.: ENV-2008-0729-EIR

Project Name: Wilshire Crescent Heights

Location: 652-6851 1/2 Crescent Heights Boulevard and 6233-6245 W. Wilshire Blvd,  
Los Angeles, CA 90010

Council District: CD 5

Dear Jimmy C. Liao:

After viewing the Environmental Impact Report for the proposed Wilshire Crescent Heights development I am convinced that such a project would be detrimental to the area. The scale and scope of this project would burden businesses, their employees and patrons, residents and commuters without adding significant benefit to the neighborhood or the city. Not only would the construction phase of the project impact people for an extended period, but if the plan is to go ahead as proposed it could have permanent repercussions that will create more congestion, accidents, pollution, health problems, and loss of income for the people who currently live and work here.

14-1

Traffic along the Wilshire corridor is heavy most times of the day. There is significant gridlock at the intersections of Wilshire and Fairfax, Wilshire and Crescent Heights and Crescent Heights and 6th Street. During peak hours traffic on Crescent Heights backs up past Olympic. The conditions are currently exceeding the volume of traffic these roads are designed to service. According to the report there are no solutions to this problem. The roads cannot be widened further, nor are there any traffic signals and other measures that would alleviate the congestion.

14-2

The proposed development project at Wilshire and Crescent will exacerbate the current situation by introducing some 300 new residents and their vehicles to a very impacted area. In addition, their intention to have 4 stories of businesses will significantly increase the amount of traffic far beyond what the bank currently generates.

14-3

As a resident, I can tell you there is great difficulty making safe turns from Orange Street to Crescent Heights -- not only during peak hours, but most times of the day -- and not just turning left. Turning right can be equally hazardous. Most people will tell you that we hear a crash about once week along this short stretch of Crescent Heights between

14-4

Wilshire and 6th Street. Many of these may not be reported, but they do happen and it is a great concern to residents and pedestrians.

It is my understanding that under the current scheme business traffic and some residential traffic will enter and exit from Wilshire Blvd, while much of the residential traffic will pour out onto Crescent Heights. Such a plan would overburden Crescent Heights as well as create significantly more traffic on Orange Street, as residents of the Wilshire-Crescent project will be forced to turn right on Crescent and then cut down Orange Street to continue their journey in the correct direction. The developers intend to further burden Crescent Heights with an additional driveway for the proposed town homes.

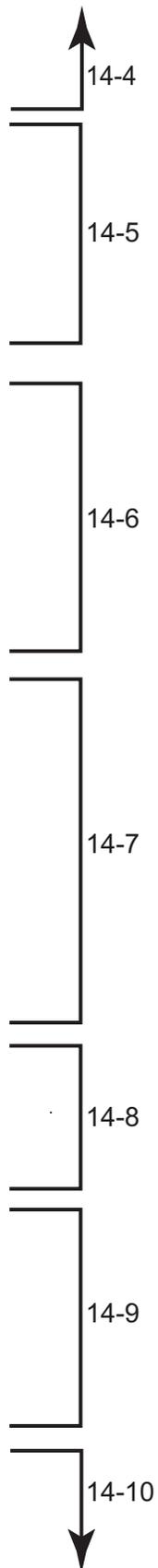
The east end of Orange Street is currently impacted by extremely heavy traffic on Fairfax and by poorly planned parking for two 99 Cents Only stores. Patrons clog the streets waiting to enter the lots, backing up local traffic. The proposed Metro station at Fairfax and Wilshire may further disrupt this end of the street. Many residents are forced to enter Orange Street from the west at Crescent Heights to get to their homes. The addition of nearly 2000 daily trips from the residents, business owners, employees and customers of the Wilshire-Crescent project will create chaos, pollution and increase in accident incidences.

The scope of this project is the biggest bone of contention among residents I have talked to. No one wants to be subjected to nearly two years of construction, noise, pollution, and vibration. We are being asked to bear the burden for something that will not benefit any of the residents or businesses in the area. There are already a great number of new housing developments within one square mile of here. Some are completed; many are empty. Significantly, there is a new mixed-use building at the end of Orange Street on the corner of Fairfax. This building was unable to sell their units, rent their units or lease their retail space in the year since its completion. There is a need for housing in Los Angeles, but certainly these plans place undue burden on an area that already services a significant amount of people, which provides ample housing.

The height of the project is a great concern to many residents. We do not wish to have our sunlight blocked, which will affect electric and heating bills and right to enjoy our gardens. One neighbor has expressed concern over the view from her condominium which will be obscured and reduce her enjoyment as well as her ability to resell it.

In addition to the environmental problems, this project impacts residents in other significant areas. There is potential for loss of income as tenants move out during construction, or due to the increase in traffic and noise and lack of local parking. Local resources such as police, fire, hospitals and schools will be stretched even further and they are already facing budget and service cuts. It is unclear what impact increased traffic to the area by residents, visitors and consumers will have on crime in this area, but it is a concern.

At a recent community meeting one of the representatives for the Wilshire-Crescent project had the audacity to say that they could legally build something much worse under



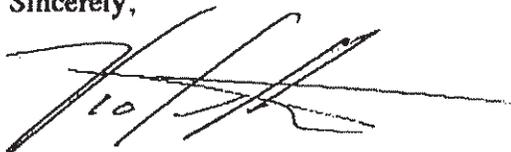
the City of Los Angeles's current building codes. It was said as if we should be thankful for the considerations they have made. Just because an area is zoned for a certain kind of business, or building does not always mean that it is a wise thing to do. Many of Los Angeles's ills have been caused by past poor city planning and here is an opportunity to ensure that trend does not continue.

The neighborhood north of Wilshire including Orange Street and 6th Street is home to a diverse demographic that is unique. We have residents of all age groups, ethnicities, and religious make-up. A significant number of senior citizens and very young children live within a few hundred feet of the proposed construction zone. Their health could be severely impacted not just in the short term by the demolition and long construction period, but permanently by the increase of pollution created by the additional traffic.

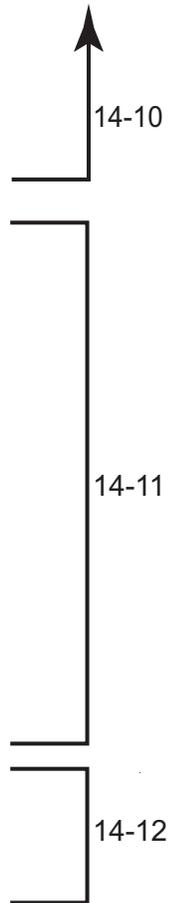
I have a three-year-old son and am very concerned about how the environment and pollution levels will affect his development and health. One of my tenants also has a three-year-old daughter with several health concerns and they have already told me that they would give notice should such a project commence. There are at least 10 children under the age of 10 within 200 feet of the construction site and many seniors as well. Not everyone will be able to afford to relocate, but the cost could be significant to their health and well-being.

Approving this project would set a precedent and allow other development companies to come in and subject the neighborhood to more high-rise buildings, overcrowding and gridlock. I urge you to not support this project as it is currently proposed.

Sincerely,



Victoria Arch  
 Property Owner  
 6221 Orange Street #4  
 Los Angeles, CA 90048



**LETTER NO. 14**

Victoria Arch  
6221 Orange Street #4  
Los Angeles, CA 90048

**Comment No. 14-1**

After viewing the Environmental Impact Report for the proposed Wilshire Crescent Heights development I am convinced that such a project would be detrimental to the area. The scale and scope of this project would burden businesses, their employees and patrons, residents and commuters without adding significant benefit to the neighborhood or the city. Not only would the construction phase of the project impact people for an extended period, but if the plan is to go ahead as proposed it could have permanent repercussions that will create more congestion, accidents, pollution, health problems, and loss of income for the people who currently live and work here.

**Response to Comment No. 14-1**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Please see the responses to comment 13-2 through 13-11, below for more specific response to concerns about congestion, accidents, and pollution.

**Comment No. 14-2**

Traffic along the Wilshire corridor is heavy most times of the day. There is significant gridlock at the intersections of Wilshire and Fairfax, Wilshire and Crescent Heights and Crescent Heights and 6th Street. During peak hours traffic on Crescent Heights backs up past Olympic. The conditions are currently exceeding the volume of traffic these roads are designed to service. According to the report there are no solutions to this problem. The roads cannot be widened further, nor are there any traffic signals and other measures that would alleviate the congestion.

**Response to Comment No. 14-2**

The traffic study identified potentially significant impacts from project traffic at Wilshire and Fairfax (both peak hours), Wilshire and Crescent Heights (a.m. peak hour only), and 6<sup>th</sup> Street and Fairfax (p.m. peak hour only). The project would not have significant impacts at 6<sup>th</sup> Street and Crescent Heights, which would continue to operate at Level of Service (LOS) A in both the a.m. and p.m. peak hour. The traffic study identified mitigation measures at all three potentially impacted intersections to reduce these impacts, but LADOT rejected the measures proposed for Wilshire Boulevard and Crescent Heights<sup>1</sup> and

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<sup>1</sup> *Mitigation measure would install SB left-turn signal phasing for Crescent Heights – unacceptable to LADOT due to additional signal phase potentially resulting in higher vehicle and pedestrian delays at this intersection.*

Wilshire Boulevard and Fairfax<sup>2</sup>. The effectiveness of the recommended traffic signal improvements at 6th Street and Fairfax Avenue will be ultimately evaluated by LADOT staff in their review of the feasibility of these measures. This measure is consistent with the Mayor's directive to install new left-turn phasing at key intersections throughout the City, in order to address ongoing and increasing traffic congestion. However, in order to provide the most conservative assessment, the Draft EIR concludes that the impact will remain significant despite the mitigation. Similarly, the project's traffic impacts were analyzed without taking into account the project's traffic demand management (TDM) program, which will include measures to reduce project-related vehicle trips.

### **Comment No. 14-3**

The proposed development project at Wilshire and Crescent will exacerbate the current situation by introducing some 300 new residents and their vehicles to a very impacted area. In addition, their intention to have 4 stories of businesses will significantly increase the amount of traffic far beyond what the bank currently generates.

### **Response to Comment No. 14-3**

As shown in Table IV.L-6 of the Draft EIR, project traffic will generally result in only nominal increases in area intersection operations. Contrary to the comment, the project will include only one level of ground floor retail totaling 6,850 square feet. The project's proposed retail and other commercial components will provide neighborhood and project -serving facilities within convenient walking distance of the existing nearby neighborhoods. The ability of area residents to conveniently walk to nearby retail establishments can also reduce vehicle traffic not only to and from the site, but throughout the area, as area residents would not need to drive to other stores.

### **Comment No. 14-4**

As a resident, I can tell you there is great difficulty making safe turns from Orange Street to Crescent Heights -- not only during peak hours, but most times of the day -- and not just turning left. Turning right can be equally hazardous. Most people will tell you that we hear a crash about once week along this short stretch of Crescent Heights between Wilshire and 6th Street. Many of these may not be reported, but they do happen and it is a great concern to residents and pedestrians.

### **Response to Comment No. 14-4**

This comment describes an existing condition in the study vicinity that is not associated with or under the control of the proposed project itself, nor does the comment state a concern or question regarding the adequacy of the analysis in the Draft EIR. The Draft EIR studied traffic impacts on local streets, including Orange Street, and concluded that the project would not result in a significant impact. However, the

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<sup>2</sup> *Mitigation measure would widen east side of Fairfax north of Wilshire to install new SB right-turn only lane – unacceptable to LADOT since the proposed measure has already been assigned to another project in the area and is currently under construction.*

project applicant has met with residents of Orange Street to discuss the issue raised in the comment, and has volunteered to work with the community, LADOT, and the local Council Office to identify potential measures to address the concerns noted.

**Comment No. 14-5**

It is my understanding that under the current scheme business traffic and some residential traffic will enter and exit from Wilshire Blvd, while much of the residential traffic will pour out onto Crescent Heights. Such a plan would overburden Crescent Heights as well as create significantly more traffic on Orange Street, as residents of the Wilshire-Crescent project will be forced to turn right on Crescent and then cut down Orange Street to continue their journey in the correct direction. The developers intend to further burden Crescent Heights with an additional driveway for the proposed town homes.

**Response to Comment No. 14-5**

The description of the proposed project's proposed access is correct, as identified in the traffic study and Draft EIR; the proposed Wilshire Boulevard driveway will accommodate all of the project's commercial traffic (serving a total of 27 parking spaces) and a portion of the project's mixed use residential traffic (229 of the 395 resident and guest parking spaces); the remaining 166 resident and guest parking spaces will be served by the proposed Crescent Heights Boulevard driveway; the proposed four-unit condominium, parking garage, housing a total of 10 spaces, is also accessed via a separate driveway on Crescent Heights. As such, the majority of project traffic is expected to utilize the Wilshire Boulevard driveway (see Figure 10, page 33 of the traffic study in Appendix H of the Draft EIR). The traffic study also accounted for potential "around the block" project traffic patterns, including the use of both 6th Street and Orange Street as travel routes to access or leave the project site. As indicated in the traffic study and Draft EIR, no project-specific significant impacts to Orange Street are anticipated. Also, see Response to Comment No. 13-4.

**Comment No. 14-6**

The east end of Orange Street is currently impacted by extremely heavy traffic on Fairfax and by poorly planned parking for two 99 Cents Only stores. Patrons clog the streets waiting to enter the lots, backing up local traffic. The proposed Metro station at Fairfax and Wilshire may further disrupt this end of the street. Many residents are forced to enter Orange Street from the west at Crescent Heights to get to their homes. The addition of nearly 2000 daily trips from the residents, business owners, employees and customers of the Wilshire-Crescent project will create chaos, pollution and increase in accident incidences.

**Response to Comment No. 14-6**

An additional analysis was conducted to determine the potential for project impacts on the segments of La Jolla Avenue between 6th Street and Wilshire Boulevard, and along Orange Street adjacent to the project site, and to the west of Crescent Heights Boulevard. Results of this analysis are shown in Table IV.L-8 of the Draft EIR. The analysis showed that there would be no significant impact to Orange Street from the

project. Nonetheless, the applicant has volunteered to work with the community, LADOT, and the local Council Office to identify potential measures to address residents' concerns regarding cut through traffic.

The proposed project site is located along the route of the Westside Subway Extension that was approved by the voters of Los Angeles County through the passage of Measure R in November 2008. An Alternatives Analysis Study was completed in January 2009 and a Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) is currently being prepared. The Draft EIS/EIR will analyze impacts to traffic and circulation around the proposed stations. The availability of mass transit is expected to help reduce traffic congestion.

The project would generate 1,214 trips, not nearly 2,000 as the comment states.

#### **Comment No. 14-7**

The scope of this project is the biggest bone of contention among residents I have talked to. No one wants to be subjected to nearly two years of construction, noise, pollution, and vibration. We are being asked to bear the burden for something that will not benefit any of the residents or businesses in the area. There are already a great number of new housing developments within one square mile of here. Some are completed: many are empty. Significantly, there is a new mixed-use building at the end of Orange Street on the corner of Fairfax. This building was unable to sell their units, rent their units or lease their retail space in the year since its completion. There is a need for housing in Los Angeles, but certainly these plans place undue burden on an area that already services a significant amount of people, which provides ample housing.

#### **Response to Comment No. 14-7**

The Draft EIR identifies and acknowledges the project's temporary noise, vibration and air quality impacts during construction. The Draft EIR also acknowledges the related projects that are being planned and may result in potential environmental impacts in combination with the project. The project site designated as a Regional Center under the Community Plan and General Plan Framework, which designation calls for greater density and intensity of development. The project's density and intensity are consistent with Community Plan, General Plan Framework, and the current zoning.

The rest of this comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

#### **Comment No. 14-8**

The height of the project is a great concern to many residents. We do not wish to have our sunlight blocked, which will affect electric and heating bills and right to enjoy our gardens. One neighbor has expressed concern over the view from her condominium which will be obscured and reduce her enjoyment as well as her ability to resell it.

**Response to Comment No. 14-8**

The General Plan Framework suggests that a Regional Center would contain structures between 6- and 20- stories with a floor area ratio of between 1.5:1 and 6.0:1. The proposed project is proposing a floor area ratio of 3.0:1 on the Lot 19 (the smaller portion of the site zoned [Q]R3-1-O) and 4.5:1 on Lots 15-18 (the majority of the site which is zoned [Q]C4-2D-O and fronts Wilshire Boulevard) which is within the Framework Element's envisioned floor area ratio for this type of development.

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Views from locations on private property are not protected under CEQA or by the City of Los Angeles CEQA Thresholds. The comment does not identify a specific flaw of the Draft EIR and expresses opinions about the project and property values. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**Comment No. 14-9**

In addition to the environmental problems, this project impacts residents in other significant areas. There is potential for loss of income as tenants move out during construction, or due to the increase in traffic and noise and lack of local parking. Local resources such as police, fire, hospitals and schools will be stretched even further and they are already facing budget and service cuts. It is unclear what impact increased traffic to the area by residents, visitors and consumers will have on crime in this area, but it is a concern.

**Response to Comment No. 14-9**

See Response to Comment No. 14-7 regarding construction impacts. The potential for loss of income is an economic issue, and CEQA does not require analysis of such issues.

The Draft EIR analyzes the project's potential impacts on police, fire, and schools. CEQA does not require analysis of hospital impacts. As discussed in Section IV.K, Public Services, the LAFD has indicated that staffing and resources are adequate to meet the project area's proposed demand for fire and emergency services. Additionally, the LAPD has stated that the Wilshire Community Police Station is staffed and equipped to provide full service to the Wilshire area, which includes the project site, and that the proposed project would not result in the need for construction or expansion of police stations or other police protection facilities. As described in the analysis in Section IV.K, LAUSD confirmed that all three public schools serving the project site would have adequate capacity to accommodate the students generated by the proposed project. Therefore impacts to police, fire, and schools will be less than significant..

**Comment No. 14-10**

At a recent community meeting one of the representatives for the Wilshire-Crescent project had the audacity to say that they could legally build something much worse under the City of Los Angeles's

current building codes. It was said as if we should be thankful for the considerations they have made. Just because an area is zoned for a certain kind of business, or building does not always mean that it is a wise thing to do. Many of Los Angeles's ills have been caused by past poor city planning and here is an opportunity to ensure that trend does not continue.

#### **Response to Comment No. 14-10**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. CEQA analysis itself is not intended as the sole tool for urban planning purposes. It should be noted that the Draft EIR includes analysis of a commercial alternative consistent with the zoning.

#### **Comment No. 14-11**

The neighborhood north of Wilshire including Orange Street and 6th Street is home to a diverse demographic that is unique. We have residents of all age groups, ethnicities, and religious make-up. A significant number of senior citizens and very young children live within a few hundred feet of the proposed construction zone. Their health could be severely impacted not just in the short term by the demolition and long construction period, but permanently by the increase of pollution created by the additional traffic.

I have a three-year-old son and am very concerned about how the environment and pollution levels will affect his development and health. One of my tenants also has a three-year-old daughter with several health concerns and they have already told me that they would give notice should such a project commence. There are at least 10 children under the age of 10 within 200 feet of the construction site and many seniors as well. Not everyone will be able to afford to relocate, but the cost could be significant to their health and well-being.

#### **Response to Comment No. 14-11**

See Response to Comment No. 14-7 regarding construction impacts. The Draft EIR included analysis of hazardous materials and air pollution, including consideration of sensitive receptors (children and elderly people). Construction related daily emissions would not exceed SCAQMD significance thresholds for ROG, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> during construction. Specifically, the construction emissions would not exceed the localized significance thresholds, which are based on the most stringent ambient air quality standards.

Additionally, during operation the proposed project would generate a net increase in daily emissions that would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, operational emissions impacts would be less-than-significant. The Draft EIR also analyzed impacts during construction for hazardous materials such as lead-based paints, PCBs, ACMs, mold, and methane. These

impacts were all determined to be less than significant. Please see Sections IV. C, Air Quality, and IV.F, Hazards, of the Draft EIR for further discussion.

**Comment No. 14-12**

Approving this project would set a precedent and allow other development companies to come in and subject the neighborhood to more high-rise buildings, overcrowding and gridlock. I urge you to not support this project as it is currently proposed.

**Response to Comment No. 14-12**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. CEQA analysis itself is not intended as the sole tool for urban planning purposes.

**From:** E Roach <eroach08@yahoo.com>  
**To:** <jimmy.liao@lacity.org>  
**CC:** <eroach08@yahoo.com>  
**Date:** 9/28/2009 4:49 PM  
**Subject:** REFERENCE NO: (ERI # ENV - 20080729-EIR)

This is regarding REFERENCE NO: (ERI # ENV - 20080729-EIR)

Dear Mr. Liao:

I am writing to voice my adamant opposition to the 21-story building and adjacent townhouses proposed for the NE corner of Wilshire and Crescent Heights and currently dubbed the "Wilshire/Crescent Development."

I live at Orange and Crescent Heights and we have seen a significant traffic increase on Crescent Heights in recent years and even more so after the advent of the Grove. There are already several accidents a month at just our corner, not to mention the ones that take place at 6th Street and Crescent Heights. For example, recently, after one accident took place at Orange and Crescent Heights, the driver of one car was walking across Crescent Height with his documentation and while on foot was himself hit by a car and had to be carted off by ambulance.

15-1

Furthermore, when the traffic light turns red at Wilshire and Crescent Heights, southbound traffic often backs up for two blocks or more, and those of us in our apartment building who need to turn left (north) find our exit blocked, because the driveway is south of Orange and North of Wilshire. It can take several minutes to make a left turn. I have lost track of the number of times that in order to get onto northbound Crescent Heights I have had to either a) turn right and go around the block or b) Inch into the left-hand southbound lane, then turn left into the parking lot of the bank across Crescent Height from our driveway (where the proposed project would be built), turn around and come back out again and turn right, finally managing to go north. That's the way it is now. And we are not the only ones in this situation -- there are dozens of driveways along Crescent Heights just between Wilshire and 3rd Street alone.

15-2

On top of this, we would see a significant increase in traffic due to this project. The Environmental Impact report provides a CONSERVATIVE increase of 1,665 daily trips across the intersections of Wilshire and Crescent Heights, Wilshire and Fairfax, and Fairfax and 6th. (And this does not include the increase in traffic that would result all along Crescent Heights and Fairfax in both directions between Wilshire and Melrose and and beyond.)

15-3

Furthermore, the draft EIR states that at these intersections there are "no feasible physical improvements available to mitigate the project's impact at these location." It would create additional blockage at the east and west ends of Orange Street, and there are no improvements to be made at either end that would help alleviate this congestion. I attended an open house regarding this project last year, and we were told to expect hundreds of additional vehicles to park there. Quite honestly, given that fact, I feel that any effort to alleviate such a volume of traffic congestion would result in little success, if any at all.

15-4

Should this project go forward, we would be subjected to intense noise and vibration from heavy equipment and high-power tools, from 7 a.m. to 9 p.m., six days per week!! That is untenable. We are a residential neighborhood, and I do not see any aspect of this project whatsoever that could possibly be of benefit. In sum, the whole thing would be a detriment to the neighborhood, both during and after construction.

15-5

We respectfully ask that the Department of City Planning support us in opposing this proposed development.

Sincerely,  
Elizabeth M. Roach  
6300 Orange Street, LA, 90048

**LETTER NO. 15**

Elizabeth Roach  
6300 Orange Street  
Los Angeles, CA 90048  
eroach08@yahoo.com

**Comment No. 15-1**

I am writing to voice my adamant opposition to the 21-story building and adjacent townhouses proposed for the NE corner of Wilshire and Crescent Heights and currently dubbed "Wilshire/Crescent Development."

I live at Orange and Crescent Heights and we have seen a significant traffic increase on Crescent Heights in recent years and even more so after the advent of the Grove. There are already several accidents a month at just our corner, not to mention the ones that take place at 6th Street and Crescent Heights. For example, recently, after one accident took place at Orange and Crescent Heights, the driver of one car was walking across Crescent Height with his documentation and while on foot was himself hit by a car and had to be carted off by ambulance.

**Response to Comment No. 15-1**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. The Draft EIR included an analysis of cumulative impacts and identified the future levels of service at the study intersections for both the without project and with project scenarios, as well as the potential incremental project traffic impacts at each location.

**Comment No. 15-2**

Furthermore, when the traffic light turns red at Wilshire and Crescent Heights, southbound traffic often backs up for two blocks or more, and those of us in our apartment building who need to turn left (north) find our exit blocked, because the driveway is south of Orange and North of Wilshire. It can take several minutes to make a left turn. I have lost track of the number of times that in order to get onto northbound Crescent Heights I have had to either a) turn right and go around the block or b) Inch into the left-hand southbound lane, then turn left into the parking lot of the bank across Crescent Height from our driveway (where the proposed project would be built), turn around and come back out again and turn right, finally managing to go north. That's the way it is now. And we are not the only ones in this situation -- there are dozens of driveways along Crescent Heights just between Wilshire and 3rd Street alone.

**Response to Comment No. 15-2**

This comment includes opinions regarding existing traffic conditions and does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. The Draft EIR identified existing conditions at study intersection and local streets based on actual traffic

counts, the future levels of service at the study intersections for both the without project and with project scenarios, and the potential incremental project traffic impacts at each location.

### **Comment No. 15-3**

On top of this, we would see a significant increase in traffic due to this project. The Environmental Impact report provides a CONSERVATIVE increase of 1,665 daily trips across the intersections of Wilshire and Crescent Heights, Wilshire and Fairfax, and Fairfax and 6th. (And this does not include the increase in traffic that would result all along Crescent Heights and Fairfax in both directions between Wilshire and Melrose and beyond.)

### **Response to Comment No. 15-3**

The analysis is considered conservative in that it did not take a credit for pass by trips at intersections of 6th Street and Crescent Heights Boulevard (intersection number 3), Wilshire Boulevard and La Jolla Avenue (intersection number 6), Wilshire Boulevard and Fairfax Avenue (intersection number 7), and Wilshire Boulevard and Ogden Drive (intersection number 8). As such, the analysis shows the net project trips at those intersections to be somewhat higher than at the remaining seven study intersections, with a total project traffic addition of approximately 1,655 net new daily trips, including approximately 133 net AM peak hour trips (48 inbound, 85 outbound), and 33 net PM peak hour trips (31 inbound, 2 outbound). This methodology assures a more conservative analysis of potential project traffic impacts, particularly at those locations closest to the site, and therefore overstates potential impacts. A detailed analysis of traffic conditions was performed at 11 study intersections. These intersections were identified, in coordination with the Los Angeles Department of Transportation (LADOT), as the most likely intersections to be impacted by project-related traffic.

### **Comment No. 15-4**

Furthermore, the draft EIR states that at these intersections there are "no feasible physical improvements available to mitigate the project's impact at these location." It would create additional blockage at the east and west ends of Orange Street, and there are no improvements to be made at either end that would help alleviate this congestion. I attended an open house regarding this project last year, and we were told to expect hundreds of additional vehicles to park there. Quite honestly, given that fact, I feel that any effort to alleviate such a volume of traffic congestion would result in little success, if any at all.

### **Response to Comment No. 15-4**

The traffic study identified potentially significant impacts from project traffic at Wilshire and Fairfax (both peak hours), Wilshire and Crescent Heights (a.m. peak hour only), and 6<sup>th</sup> Street and Fairfax (p.m. peak hour only). The project would not have significant impacts at 6<sup>th</sup> Street and Crescent Heights, which would continue to operate at Level of Service (LOS) A in both the a.m. and p.m. peak hour. The traffic study identified mitigation measures at all three potentially impacted intersections to reduce these

impacts, but LADOT rejected the measures proposed for Wilshire Boulevard and Crescent Heights<sup>3</sup> and Wilshire Boulevard and Fairfax<sup>4</sup>. The effectiveness of the recommended traffic signal improvements at 6th Street and Fairfax Avenue will be ultimately evaluated by LADOT staff in their review of the feasibility of these measures. This measure is consistent with the Mayor's directive to install new left-turn phasing at key intersections throughout the City, in order to address ongoing and increasing traffic congestion. However, in order to provide the most conservative assessment, the Draft EIR concludes that the impact will remain significant despite the mitigation. Similarly, the project's traffic impacts were analyzed without taking into account the project's traffic demand management (TDM) program, which will include measures to reduce project-related vehicle trips.

An additional analysis was conducted to determine the potential for project impacts on the segments of La Jolla Avenue between 6th Street and Wilshire Boulevard, and along Orange Street adjacent to the project site, and to the west of Crescent Heights Boulevard. Results of this analysis are shown in Table IV.L-8 of the Draft EIR. The analysis showed that there would be no significant impact to Orange Street from the project. However, the project applicant has met with residents of Orange Street to discuss the issue raised in the comment, and has volunteered to work with the community, LADOT, and the local Council Office to identify potential measures to address the concerns noted.

The mixed-use tower portion of the project proposes to provide a total of 422 spaces within the six and one-half level parking structure, including the required 316 apartment resident spaces and 79 apartment guest spaces, plus a total of 27 commercial spaces. The project would conform to all applicable parking requirements, and no significant off site parking impacts or "overflow" parking into any of the adjoining residential neighborhoods is anticipated, and impacts would be less than significant.

#### **Comment No. 15-5**

Should this project go forward, we would be subjected to intense noise and vibration from heavy equipment and high-power tools, from 7 a.m. to 9 p.m., six days per week!! That is untenable. We are a residential neighborhood, and I do not see any aspect of this project whatsoever that could possibly be of benefit. In sum, the whole thing would be a detriment to the neighborhood, both during and after construction.

#### **Response to Comment No. 15-5**

The Draft EIR acknowledges that construction noise and vibration levels would temporarily and intermittently exceed the threshold of significance and that therefore there would be significant and unavoidable impacts. The Draft EIR includes mitigation measures that would to reduce noise and vibration levels associated with construction at the project upon the adjacent multi-family residences, but

<sup>3</sup> *Mitigation Measure would install SB left-turn signal phasing for Crescent Heights – unacceptable to LADOT due to additional signal phase potentially resulting in higher vehicle and pedestrian delays at this intersection.*

<sup>4</sup> *Mitigation Measure would widen east side of Fairfax north of Wilshire to install new SB right-turn only lane – unacceptable to LADOT since the proposed measure has already been assigned to another project in the area and is currently under construction.*

not to less than significance. These measures include minimizing the concurrent use of noisy equipment and locating such equipment as far as is feasible from the adjacent residential uses.

The applicant has revised the construction hours as stated in the Draft EIR from 7 a.m. to 9 p.m. Monday through Saturday to 7:00 a.m. to 6:00 p.m. Monday through Friday 8:00 a.m. to 6:00 p.m. on Saturday. Additionally, concrete pours would be restricted to 7:00 a.m. to 7:00 p.m. Monday through Friday. Please see Section III, Additions and Corrections, of this Final EIR for the revised information.

The rest of this comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**From:** <mrsfeldo@aol.com>  
**To:** <jimmy.liao@lacity.org>  
**Date:** 9/28/2009 5:12 PM  
**Subject:** Wilshire Crescent Heights EIR; Env-2008-0729-EIR  
**Attachments:** Wilshire-CH EIR.doc

Dear Mr. Liao:

Please find attached a letter which addresses the draft EIR for the above project.? Please acknowledge receipt of the letter.

I will follow up with a paper copy.

Thanks,

Teresa Feldman

(323) 937-7787

16-1

September 28, 2008

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

Sent Via Email: [Jimmy.Liao@lacity.org](mailto:Jimmy.Liao@lacity.org)

Re: Draft EIR for Wilshire Crescent Heights Project; ENV-2008-0729-EIR; State Clearinghouse No. 2008051017

Dear Mr. Liao:

I am writing to discuss the draft EIR for the above-mentioned project. I wish to address the environmental impacts that cannot be mitigated on this project per the draft report, as well as items that the report states have less than significant impacts, or impacts that can be mitigated.

It is clear from the report that winter shade/shadows, construction noise and vibration levels, and traffic/transportation impacts cannot be mitigated if this project goes forward as proposed. These three items, on their face, should be enough to require an alteration of the project. However, there are other impacts that are more significant than the report shows, and there are elements unique to this neighborhood that are not fully addressed in the report. These issues must be addressed through alteration of the project, changes in the staging and construction, extensive traffic-calming measures, and consideration of unique neighborhood characteristics with regard to street layouts, and existing street vacations. In addition, the report contains assumptions regarding public services that have been rendered obsolete due to the slashing of services throughout the City and State.

Section IV.B – Aesthetics –

Orange Street, which is directly behind this project, is zoned [Q]R-3-1-O; projects are limited in height to 45 feet, to provide an appropriate transition to 6<sup>th</sup> Street, which is zoned R-2-1, and has height limits of 33 feet. While the Applicant has endeavored to orient the project to the southwest corner of the site, the proposed 21-story height does not provide for an appropriate transition to the much lower residences to the north.

16-2

16-3

The report states that the project will not impact scenic views. However, there are at least two sites in the vicinity that will have their views impacted. There is a condominium building on the north side of Orange Street that is 4 stories tall and has a rooftop deck and pool. This building's views will be affected by this project. In addition, a commercial building at 6317 Wilshire Boulevard, currently a medical office building, is scheduled for Adaptive Reuse into a hotel with rooftop garden and pool. The views to the northeast will be wiped out with the completion of the 21-story tower.

16-4

The report states that winter shade/shadow impacts cannot be mitigated under the proposed project, but even that is an understatement of the impact. The Applicant refers to several other tall buildings along Wilshire as proof that this project is appropriate for the site. However, the majority of taller projects along this stretch of Wilshire are on the south side of the street, where the shade/shadows affect only the street itself and other commercial buildings. This project is on the north side of Wilshire, near medium and low-density housing. It will cast shadows over several adjacent buildings, and the rooftop deck at 6317 Wilshire will be almost permanently shaded throughout the year, not just during the winter. A project that is shorter and less dense would be the only way to mitigate the shade/shadow impact.

16-5

#### Section IV.H – Land Use

A commercial corridor such as Wilshire Boulevard is the appropriate place for a project of the proposed height and density such as the one proposed. However, given the proximity to the much lower density neighborhood to the north, and the [Q] conditions which limit Orange Street dwellings to 45 feet in height, the Planning Department must treat this site as a transitional site, and require alterations to the project to bring it more in line with the neighborhood to the north. Alternative 4, the Reduced Height Alternative, is not an appropriate alternative, as its massing would have a different, but still negative, impact on the neighborhood. A reduction in both density and height, along with traffic calming measures, would seem to be appropriate for this project.

16-6

#### Section IV.I - Noise

The report states that the impacts of the noise from construction equipment and trucks cannot be mitigated. Table IV.I-6 lists noise levels at 50 feet. These are unacceptable levels, yet the Applicant proposes construction that is within twenty-five feet of dwellings, and also proposes a staging area that is six feet away from a residence. No project should be allowed to go forward without ensuring that the staging area be moved more than 50 feet away from any residences. In addition, the Applicant proposes to do demolition and construction between the hours of 7 a.m. and 9 p.m. Monday through Friday, and 8 a.m. to 6 p.m. on Saturday. Given the proximity to a residential area, the hours should be greatly reduced, and perhaps extra sound barriers should be erected near the affected homes, or temporary relocation of residents should take place.

16-7

Section IV.K – Public Services/ Section IV.M - Utilities

I am addressing these two sections of the draft EIR as one. Section IV.K concerns the ability of Fire, Police, Schools, Parks, and Libraries to meet the needs of an expanded population, and Section IV.M, addresses the issue of Utilities and Service Systems. The City’s annual report on infrastructure is a legally required public document that has not been done for several years and much of the data supplied for the report is several years old. Therefore, there is really no way to ascertain whether or not the existing infrastructure is adequate to absorb the increased needs of this and the related projects in the area. Two lawsuits have been filed regarding this issue.

16-8

Even with the delay in issuance of the infrastructure report, existing, older data, as well as public information regarding current budget cuts, show that infrastructure has failed to keep pace with development in the area. The City has failed to recruit and train enough police officers to support existing populations. There are scheduled closures of fire stations, which threaten the public safety.

While LAUSD data shows that Hancock Park Elementary School is under capacity and can accommodate an additional 126 students, the reality is that its 2009-2010 population, 736 students are currently enrolled, which is the school’s traditional capacity. Under an emergency provision that raises class size, the school has a temporary capacity of 800 students, but the true capacity hovers around 740. In addition, while the total capacity is currently 800, the actual capacity is much lower due to limited facilities for younger children. The school cannot absorb additional students without major alterations in the school facilities. On the list of related projects, there are three projects that fall within the elementary school boundaries, one being built with an estimated increase of 27 students, and two proposed, with 65 additional students. This project estimates 32 elementary school students. The total number of students added to the attendance area is 124, well over capacity.

16-9

Regarding Parks and Recreation: They City has consistently shown that park space in the Wilshire Plan Area lags well behind the ideal of 4 acres per 1,000 people, and even the City’s average of .76 acres per 1,000 residents. The Wilshire Plan Area has only .23 acres of recreational space per 1,000 residents, and that figure has not changed for many years. While the project may provide open space and recreational space for residents, it falls short of the estimated 1.62 acres it is estimated that this site will demand. Our local park space has been encroached upon by the construction of museum space both at Hancock Park and Pan Pacific Park, and the collection of Quimby Fees has not led to the acquisition of new land for open space. This project could address the public open space shortage by providing extra open space at their site, perhaps a pocket park in lieu of the town homes.

16-10

As for Utilities, City residents are experiencing drastic increases in water and electricity rates, both to encourage conservation and to raise funds for much needed upgrades and

16-11

repairs. It is irresponsible for the City to add dwelling units when the infrastructure clearly needs time to catch up with demand.

#### Section IV.L – Traffic/Transportation

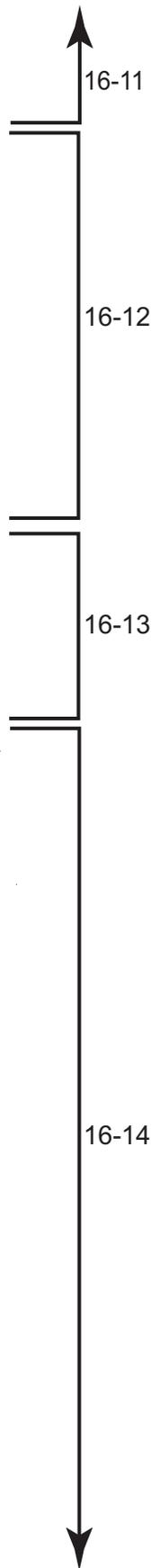
The report states that traffic impacts cannot be mitigated at three specific intersections surrounding the project. This is correct. However, that is not the complete story. It is obvious that the increase in traffic due to the project, without additional measures to add capacity, will have a detrimental and devastating impact to surrounding collector and local streets. Also, the traffic study does not take into account the proposed BRT lane on Wilshire, which could have the undesired consequence of funneling automobile traffic off of Wilshire and onto 6<sup>th</sup>. Finally, There are unique neighborhood characteristics that make it impossible to add car trips without detrimental impact on the surrounding neighborhood, unless significant traffic calming measures are implemented.

In the past, the City has allowed for street vacations in the neighborhood to benefit large developments. Park La Brea has been gated, effectively limiting north south traffic to Fairfax and Hauser; construction of the Grove and closure of the CBS site has eliminated several through streets, and LACMA recently closed Odgen Drive to through traffic from Wilshire to 6<sup>th</sup> street. City policy has limited drivers' choices.

The residential area between Fairfax and Crescent Heights, from Third to Wilshire, is in a unique position and faces unique challenges to neighborhood character. These residential streets are tucked between two secondary highways, and are always impacted by cut-through traffic. 6<sup>th</sup> Street between Fairfax and Crescent Heights is in an especially vulnerable position, as it is the first block west of Fairfax, where 6<sup>th</sup> changes from a secondary highway to a collector street. The City has attempted to discourage traffic from using 6<sup>th</sup> Street west of Fairfax for commuting, by changing striping, the timing of lights, and the installation of a landscaped median, but it still has a great deal of traffic. Crescent Heights, through the residential area, is a modified secondary highway, but should be viewed as a collector street in terms of traffic. The limited number of through streets in the area and the constant gridlock on northbound Fairfax between Wilshire and 3<sup>rd</sup>, lead to a concentration of cars on 6<sup>th</sup> and Crescent Heights. In addition, Orange Street between Fairfax and Crescent Heights sees a great deal of traffic from the 99 Cent Only Store, as well as from cut through traffic.

The traffic study shows a fairly even distribution of cars on the streets surrounding the project, but, as a practical matter, most of the traffic will end up turning north on Crescent Heights and east on either Orange or 6<sup>th</sup> Streets. Any cars using the Wilshire exit have to turn right, and they will go right at Crescent Heights and right on 6<sup>th</sup> if they want to head downtown. Those wanting to go south will turn right on Crescent Heights, turn right on Orange, and go southbound on Fairfax. Those who use the Crescent Heights exit will do the same thing.

As for residents entering the project, again 6<sup>th</sup> Street and Orange Street will bear the most of the traffic. It is not practical for residents to sit on southbound Crescent Heights and



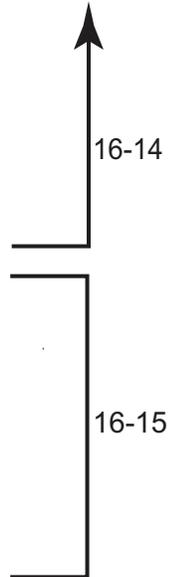
wait for traffic to let them turn left into the project; therefore, they will proceed eastbound on either 6<sup>th</sup> or Orange, go south on Fairfax, east on Wilshire, and then enter the building. Without turn restrictions, traffic calming measures, making streets one way, or street closures, Orange and 6<sup>th</sup> will see a much more significant impact than the traffic study shows. A project of lesser height and density would have fewer car trips, and would lessen the impact on these streets.

Given the significant and unavoidable impacts on the neighborhood as outlined in the draft EIR, and the additional factors that cause a significant impact on the neighborhood, the Applicant must be required to put forward an alternative project that will address the issues. An appropriate project would be one that retains the feel of a new, modern building, and that recognizes its location on Wilshire Boulevard while acknowledging that it is on a transitional site. It is commendable that the Applicant has oriented the project toward the Wilshire end of the site, but additional changes and mitigation measures are needed to maintain neighborhood character.

Sincerely,

Teresa Kiely Feldman  
6231 West 6<sup>th</sup> Street  
Los Angeles, CA 90048

(323) 937-7787



**LETTER NO. 16**

Theresa Feldman  
mrsfeldo@aol.com

**Comment No. 16-1**

Please find attached a letter which addresses the draft EIR for the above project.? Please acknowledge receipt of the letter.

I will follow up with a paper copy.

**Response to Comment No. 16-1**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**Comment No. 16-2**

I am writing to discuss the draft EIR for the above-mentioned project. I wish to address the environmental impacts that cannot be mitigated on this project per the draft report, as well as items that the report states have less than significant impacts, or impacts that can be mitigated.

It is clear from the report that winter shade/shadows, construction noise and vibration levels, and traffic/transportation impacts cannot be mitigated if this project goes forward as proposed. These three items, on their face, should be enough to require an alteration of the project. However, there are other impacts that are more significant than the report shows, and there are elements unique to this neighborhood that are not fully addressed in the report. These issues must be addressed through alteration of the project, changes in the staging and construction, extensive traffic-calming measures, and consideration of unique neighborhood characteristics with regard to street layouts, and existing street vacations. In addition, the report contains assumptions regarding public services that have been rendered obsolete due to the slashing of services throughout the City and State.

**Response to Comment No. 16-2**

The Draft EIR included analysis of all CEQA-required topics and disclosed all impacts, including significant and avoidable impacts to winter shade/shadows, construction noise and vibration levels, and traffic/transportation impacts. In order to approve the project despite these impacts, the City decision-makers would need to adopt a statement of overriding considerations. The commenter did not specifically state what the “unique elements” are of the neighborhood or what “other impacts that are more significant”. Nor does the commenter specify the project alterations that would purportedly address these issues. Therefore, it is not possible to address those concerns. This comment does not state a specific

concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR, but states the author's opinion regarding the need for alteration of the project. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. It should also be noted that the applicant has volunteered to work with the community, LADOT, and the local Council Office to identify potential measures to address residents' concerns regarding cut through traffic.

### **Comment No. 16-3**

Section IV.B - Aesthetics -

Orange Street, which is directly behind this project, is zoned [Q]R3-1-O; projects are limited in height to 45 feet, to provide an appropriate transition to 6th Street, which is zoned R-2-1, and has height limits of 33 feet. While the Applicant has endeavored to orient the project to the southwest corner of the site, the proposed 21-story height does not provide for an appropriate transition to the much lower residences to the north.

### **Response to Comment No. 16-3**

The project is proposing a floor area ratio of 3.0:1 on the Lot 19 (the smaller portion of the site zoned [Q]R3-1-O) and 4.5:1 on Lots 15-18 (the majority of the site which is zoned [Q]C4-2D-O and fronts Wilshire Boulevard) which is consistent with the density for the site under the General Plan's Framework Element, the Community Plan, and the existing zoning/Height District. The floor area ratio of 4.5:1 on Lots 15-18 is consistent with the existing development along Wilshire Boulevard, and the floor area ratio of 3.0:1 on the Lot 19 (the smaller portion of the site zoned [Q]R3-1-O) is consistent with the existing development on Orange Street. The comment does not identify a specific flaw of the Draft EIR and expresses opinions about the project and property values. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

### **Comment No. 16-4**

The report states that the project will not impact scenic views. However, there are at least two sites in the vicinity that will have their views impacted. There is a condominium building on the north side of Orange Street that is 4 stories tall and has a rooftop deck and pool. This building's views will be affected by this project. In addition, a commercial building at 6317 Wilshire Boulevard, currently a medical office building, is scheduled for Adaptive Reuse into a hotel with rooftop garden and pool. The views to the northeast will be wiped out with the completion of the 21-story tower.

### **Response to Comment No. 16-4**

Views of the project site would not obstruct, totally block, partially interrupt or create a minor diminishment of a valued public view or provide a visual element that would considerably deter from a valued public view as there are no valued public views in the immediate vicinity. Views from locations on private property are not protected under CEQA or by the City of Los Angeles CEQA Thresholds.

Moreover, the project would not block private views of scenic vistas or valued visual resources from either of the properties cited in the comment, as the existing views through the project site consist primarily of buildings and sky. Further, the building would constitute only a small portion of the viewshed. Therefore, even if private views were projected, the project's impacts on these views would not be significant.

**Comment No. 16-5**

The report states that winter shade/shadow impacts cannot be mitigated under the proposed project, but even that is an understatement of the impact. The Applicant refers to several other tall buildings along Wilshire as proof that this project is appropriate for the site. However, the majority of taller projects along this stretch of Wilshire are on the south side of the street, where the shade/shadows affect only the street itself and other commercial buildings. This project is on the north side of Wilshire, near medium and low-density housing. It will cast shadows over several adjacent buildings, and the rooftop deck at 6317 Wilshire will be almost permanently shaded throughout the year, not just during the winter. A project that is shorter and less dense would be the only way to mitigate the shade/shadow impact.

**Response to Comment No. 16-5**

The Draft EIR acknowledges the significant and unavoidable impacts to shade/shadow on three adjacent multi-family buildings only during the winter when the sun is lowest in the sky. As shown on Figure IV.B-2 of the Draft EIR, the mixed use building's 48-foot tall parking podium (the widest portions of the shadows) will cast shadows on these three buildings in excess of the three hour significance threshold. This demonstrates that reducing the height to 48 feet would not reduce the impact to less than significant. Pursuant to the CEQA Guidelines Section 15126.6, the Draft EIR in Section VI, Alternatives, provided two alternatives that addressed significant and unavoidable significant shade/shadow impacts of the proposed project by reducing the height of the building. Alternatives 2 and 4, if implemented, would still cause shading of three multi-family structures immediately north of the project site. Contrary to the comment, 6317 Wilshire would only be shaded during the summer for a short period of time in the morning. Impacts on this building would be less than significant.

**Comment No. 16-6**

Section IV.H - Land Use

A commercial corridor such as Wilshire Boulevard is the appropriate place for a project of the proposed height and density such as the one proposed. However, given the proximity to the much lower density neighborhood to the north, and the [Q] conditions which limit Orange Street dwellings to 45 feet in height, the Planning Department must treat this site as a transitional site, and require alterations to the project to bring it more in line with the neighborhood to the north. Alternative 4, the Reduced Height Alternative, is not an appropriate alternative, as its massing would have a different, but still negative, impact on the neighborhood. A reduction in both density and height, along with traffic calming measures, would seem to be appropriate for this project.

**Response to Comment No. 16-6**

See Response to Comment No. 16-3. It should be noted that Alternative 2 would reduce both density and height of the project.

**Comment No. 16-7**

## Section IV.I - Noise

The report states that the impacts of the noise from construction equipment and trucks cannot be mitigated. Table IV.I-6 lists noise levels at 50 feet. These are unacceptable levels, yet the Applicant proposes construction that is within twenty-five feet of dwellings, and also proposes a staging area that is six feet away from a residence. No project should be allowed to go forward without ensuring that the staging area be moved more than 50 feet away from any residences, In addition, the Applicant proposes to do demolition and construction between the hours of 7 a.m, and 9 p.m, Monday through Friday, and 8 a.m, to 6 p.m. on Saturday. Given the proximity to a residential area, the hours should be greatly reduced, and perhaps extra sound barriers should be erected near the affected homes, or temporary relocation of residents should take place.

**Response to Comment No. 16-7**

The Draft EIR acknowledges that construction noise and vibration levels would temporarily and intermittently exceed the threshold of significance and that therefore there would be significant and unavoidable impacts. The Draft EIR includes mitigation measures that would to reduce noise and vibration levels associated with construction at the project upon the adjacent multi-family residences, but not to less than significance. These measures include minimizing the concurrent use of noisy equipment and locating such equipment as far as is feasible from the adjacent residential uses. Due to site constraints and the proximity of these residential uses, it is not feasible to locate all noise-generating equipment 50 feet from the existing uses.

The applicant has revised the construction hours as stated in the Draft EIR from 7 a.m. to 9 p.m. Monday through Saturday to 7:00 a.m. to 6:00 p.m. Monday through Friday 8:00 a.m. to 6:00 p.m. on Saturday. Additionally, concrete pours would be restricted to 7:00 a.m. to 7:00 p.m. Monday through Friday. Please see Section III, Additions and Corrections, of this Final EIR for the revised information.

In addition, the following mitigation measure has been added to the Draft EIR (please also see Section III, Additions and Corrections, of this Final EIR):

- I-8 During construction, an approximate 15-foot, temporary plywood barrier shall be erected along the northern boundary of the project site to reduce construction noise impacts on nearby sensitive receptors. The plywood barrier shall be erected prior to demolition activities and remain in place until exterior construction has been completed.

**Comment No. 16-8**

Section IV.K - Public Services/ Section IV.M - Utilities

I am addressing these two sections of the draft EIR as one. Section IV.K concerns the ability of Fire, Police, Schools, Parks, and Libraries to meet the needs of an expanded population, and Section IV.M, addresses the issue of Utilities and Service Systems. The City's annual report on infrastructure is a legally required public document that has not been done for several years and much of the data supplied for the report is several years old. Therefore, there is really no way to ascertain whether or not the existing infrastructure is adequate to absorb the increased needs of this and the related projects in the area. Two lawsuits have been filed regarding this issue.

Even with the delay in issuance of the infrastructure report, existing, older data, as well as public information regarding current budget cuts, show that infrastructure has failed to keep pace with development in the area. The City has failed to recruit and train enough police officers to support existing populations. There are scheduled closures of fire stations, which threaten the public safety.

**Response to Comment No. 16-8**

The comment discusses the City of Los Angeles' report called the "Annual Report on Growth and Infrastructure" and offers opinions regarding the City's infrastructure and general developments impacts on it. The commenter, however, merely offers her opinion regarding the state of the City's infrastructure and the usefulness of the Annual Reports to provide additional information. Whether or not the Annual Reports will actually provide additional information is speculative. Furthermore, producing the Annual Report is not a mandatory requirement under the General Plan's Framework Element (Chapter 2, Growth Monitoring) for conducting CEQA review. It is a means to "facilitate" infrastructure assessment that may be useful for environmental review. The fact that further studies or analysis might be useful or shed light on the subject is not evidence that an EIR analysis is inadequate. One can always imagine some additional study or analysis that might provide helpful information, but it is the adequacy of the information found in the Draft EIR that is important.

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

(LAPL). These sources are sufficient to ascertain the availability of public infrastructure to accommodate the project and to analyze any potential project impacts on the City's infrastructure that may result. The comment will be forwarded to the decision making bodies for their review and consideration.

**Comment No. 16-9**

While LAUSD data shows that Hancock Park Elementary School is under capacity and can accommodate an additional 126 students, the reality is that its 2009-2010 population, 736 students are currently enrolled, which is the school's traditional capacity. Under an emergency provision that raises class size, the school has a temporary capacity of 800 students, but the true capacity hovers around 740. In addition, while the total capacity is currently 800, the actual capacity is much lower due to limited facilities for younger children. The school cannot absorb additional students without major alterations in the school facilities. On the list of related projects, there are three projects that fall within the elementary school boundaries, one being built with an estimated increase of 27 students, and two proposed, with 65 additional students. This project estimates 32 elementary school students. The total number of students added to the attendance area is 124, well over capacity.

**Response to Comment No. 16-9**

Data related to enrollment and capacity of Hancock Park Elementary School were provided by LAUSD. The commenter did not provide any data to support the opinion expressed in the comment. As stated in the Draft EIR, LAUSD has determined that Hancock Park Elementary School has sufficient capacity. Additionally, payment of required developer school fees to the LAUSD (pursuant to SB 50) are deemed to provide full and complete mitigation of school facilities impacts. The payment of these fees by the related projects would be mandatory and would ensure that cumulative impacts upon school services remain less than significant.

**Comment No. 16-10**

Regarding Parks and Recreation: The City has consistently shown that park space in the Wilshire Plan Area lags well behind the ideal of 4 acres per 1,000 people, and even the City's average of .76 acres per 1,000 residents. The Wilshire Plan Area has only .23 acres of recreational space per 1,000 residents, and that figure has not changed for many years. While the project may provide open space and recreational space for residents, it falls short of the estimated 1.62 acres it is estimated that this site will demand. Our local park space has been encroached upon by the construction of museum space both at Hancock Park and Pan Pacific Park, and the collection of Quimby Fees has not led to the acquisition of new land for open space. This project could address the public open space shortage by providing extra open space at their site, perhaps a pocket park in lieu of the town homes.

**Response to Comment No. 16-10**

The Quimby Act (Government Code Section 66477) authorizes local agencies to enact ordinances which would require the dedication of land or payment of fees for park or recreational purposes for projects involving residential subdivisions. The City of Los Angeles has established a local ordinance, Los

Angeles Municipal Code (LAMC) Section 17.12 (Park and Recreation Site Acquisition and Development Provisions), which implements the Quimby Act. The purpose of the LAMC Section 17.12 is to enable the City to meet the park and recreation needs generated by residential projects. The project will pay Quimby Fees as required by the City of Los Angeles. These fees will be used to acquire or improve parks in the project vicinity. Therefore, impacts on parks and recreation will be less than significant.

**Comment No. 16-11**

As for Utilities, City residents are experiencing drastic increases in water and electricity rates, both to encourage conservation and to raise funds for much needed upgrades and repairs. It is irresponsible for the City to add dwelling units when the infrastructure clearly needs time to catch up with demand.

**Response to Comment No. 16-11**

The Draft EIR included analysis of the project's impacts to water supply and energy and concluded that these impacts would be less than significant. The proposed project would be constructed to increase building energy efficiency with LEED characteristics. The comment does not identify a specific flaw of the Draft EIR and expresses opinions about the project. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**Comment No. 16-12**

Section IV.L - Traffic/Transportation

The report states that traffic impacts cannot be mitigated at three specific intersections surrounding the project. This is correct. However, that is not the complete story. It is obvious that the increase in traffic due to the project, without additional measures to add capacity, will have a detrimental and devastating impact to surrounding collector and local streets. Also, the traffic study does not take into account the proposed BRT lane on Wilshire, which could have the undesired consequence of funneling automobile traffic off of Wilshire and onto 6<sup>th</sup>. Finally, there are unique neighborhood characteristics that make it impossible to add car trips without detrimental impact on the surrounding neighborhood, unless significant traffic calming measures are implemented.

**Response to Comment No. 16-12**

The descriptions of the potential project impacts are described fully in the Draft EIR. Further, potential (recommended) traffic mitigation measures to address these impacts are also noted in the project traffic study (Appendix H of the Draft EIR). LADOT reviewed these preliminary mitigation recommendations, and determined that they were not feasible at two of the locations. To provide a conservative assessment, the Draft EIR concluded that mitigation at the third location would not reduce the project's impacts to less than significant. As a result, the Draft EIR concludes that impacts will remain significant and unavoidable at all three intersections. The proposed Wilshire Bus Lane Project is currently underway with its Environmental Assessment, and since this project is not currently approved, the traffic study for the proposed Wilshire/Crescent Heights project did not assume or rely on its effects to reduce potential

project trips, and as such, the traffic study presents a “worst case” analysis of potential project impacts. Additionally, while the introduction of this convenient transit facility in close proximity to the proposed Wilshire/Crescent Heights project is likely to encourage greater transit utilization by project residents, visitors, and patrons, specific project-related transit ridership estimates cannot be identified until detailed bus headways and schedules are identified. However, it is anticipated that the proposed Wilshire Bus Lane Project environmental assessments will include estimates of the anticipated potential ridership demands along its route, including the proposed Wilshire/Crescent Heights project, and that the Bus Lane project will include sufficient capacity to accommodate patronage by the proposed Wilshire/Crescent Heights project as well as other proposed and ongoing developments along its route; no significant Wilshire/Crescent Heights project-related impacts to future bus or other transit facilities are anticipated. Additionally, it should be noted that increased transit utilization by residents or visitors of the Wilshire/Crescent Heights project will act to reduce the project’s potential traffic impacts as identified in the Draft EIR. Further, the Wilshire BRT project environmental assessment will be required to evaluate that project’s potential effects and impacts to traffic along the Wilshire Boulevard corridor, and to provide recommendations to mitigate such impacts to the extent feasible; any such impacts are beyond the control of the Wilshire/Crescent Heights project. Therefore, as the impacts of the Wilshire BRT project and its potential mitigation measures have not yet been identified, it is beyond the scope of analysis of the proposed Wilshire/Crescent Heights project to include speculative impacts from this as-yet unapproved and not fully-defined transit project.

The Draft EIR studied traffic impacts on local streets and concluded that the project would not result in a significant impact. Nonetheless, the applicant has volunteered to work with the community, LADOT, and the local Council Office to identify potential measures to address residents’ concerns regarding cut through traffic.

### **Comment No. 16-13**

In the past, the City has allowed for street vacations in the neighborhood to benefit large developments. Park La Brea has been gated, effectively limiting north south traffic to Fairfax and Hauser; construction of the Grove and closure of the CBS site has eliminated several through streets, and LACMA recently closed Odgen Drive to through traffic from Wilshire to 6th street. City policy has limited drivers' choices.

### **Response to Comment No. 16-13**

The comment does not identify a specific flaw of the Draft EIR and expresses opinions about the traffic conditions in the area. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

### **Comment No. 16-14**

The residential area between Fairfax and Crescent Heights, from Third to Wilshire, is in a unique position and faces unique challenges to neighborhood character. These residential streets are tucked between two secondary highways, and are always impacted by cut-through traffic. 6<sup>th</sup> Street between Fairfax and

Crescent Heights is in an especially vulnerable position, as it is the first block west of Fairfax, where 6<sup>th</sup> changes from a secondary highway to a collector street. The City has attempted to discourage traffic from using 6<sup>th</sup> Street west of Fairfax for commuting, by changing striping, the timing of lights, and the installation of a landscaped median, but it still has a great deal of traffic. Crescent Heights, through the residential area, is a modified secondary highway, but should be viewed as a collector street in terms of traffic. The limited number of through streets in the area and the constant gridlock on northbound Fairfax between Wilshire and 3rd, lead to a concentration of cars on 6<sup>th</sup> and Crescent Heights. In addition, Orange Street between Fairfax and Crescent Heights sees a great deal of traffic from the 99 Cent Only Store, as well as from cut through traffic.

The traffic study shows a fairly even distribution of cars on the streets surrounding the project, but, as a practical matter, most of the traffic will end up turning north on Crescent Heights and east on either Orange or 6th Streets. Any cars using the Wilshire exit have to turn right, and they will go right at Crescent Heights and right on 6th if they want to head downtown. Those wanting to go south will turn right on Crescent Heights, turn right on Orange, and go southbound on Fairfax. Those who use the Crescent Heights exit will do the same thing.

As for residents entering the project, again 6<sup>th</sup> Street and Orange Street will bear the most of the traffic. It is not practical for residents to sit on southbound Crescent Heights and wait for traffic to let them turn left into the project; therefore, they will proceed eastbound on either 6<sup>th</sup> or Orange, go south on Fairfax, east on Wilshire, and then enter the building. Without turn restrictions, traffic calming measures, making streets one way, or street closures, Orange and 6<sup>th</sup> will see a much more significant impact than the traffic study shows. A project of lesser height and density would have fewer car trips, and would lessen the impact on these streets.

#### **Response to Comment No. 16-14**

The commenter expressed the opinion that the traffic distribution in the traffic analysis is inaccurate. The anticipated project component (residential and retail uses) traffic distributions are described in detail and shown in Figures IV.L-4 through IV.L-7 of the Draft EIR. As shown in these figures, the study anticipates many of the traffic patterns noted by the commenter, with a total of approximately 20% of the project's outbound residential traffic, and about 30% of the project's outbound retail/commercial trips travelling along either 6th Street or Orange Street in order to orient their trips to the east or south of the site. Further, only about 20% of the project's inbound residential trips are anticipated to access the site from southbound Crescent Heights turn left into the project; the remaining project traffic will adjust their approach travel paths to use other streets, including both 6th Street and Orange Street, to access either the Wilshire Boulevard driveway or the Crescent Heights Boulevard driveways. Therefore, the commenter is mistaken that the project traffic study does not reasonably account for the particular travel path characteristics associated with the proposed project and its surrounding vicinity. As described in the Draft EIR, no significant project-related traffic impacts to Orange Street are expected.

As identified in the traffic study and Draft EIR, the proposed Wilshire Boulevard driveway will accommodate all of the project's commercial traffic (serving a total of 27 spaces) and a portion of the

project's residential traffic (229 of the 395 resident and guest parking spaces); the remaining 166 resident and guest parking spaces will be served by the proposed access on Crescent Heights Boulevard. The proposed four-unit condominium, parking garage, housing a total of 10 spaces, is also accessed via a separate driveway. As such, the majority of project traffic is expected to utilize the Wilshire Boulevard driveway (see Figure 10, page 33 of the traffic study in Appendix H of the Draft EIR). The traffic study also accounted for potential "around the block" project traffic patterns, including the use of both 6th Street and Orange Street as travel routes to access or leave the project site. As indicated in the traffic study and Draft EIR, no project-specific significant impacts to Orange Street are anticipated.

This comment also expressed opinions regarding the existing conditions in the study vicinity that are not associated with or under the control of the proposed project itself, nor does the comment state a concern or question regarding the adequacy of the analysis in the Draft EIR. However, the project applicant has met with residents of Orange Street to discuss the issue raised in the comment, and has volunteered to work with the community, LADOT, and the local Council Office to identify potential measures to address the concerns noted.

#### **Comment No. 16-15**

Given the significant and unavoidable impacts on the neighborhood as outlined in the draft EIR, and the additional factors that cause a significant impact on the neighborhood, the Applicant must be required to put forward an alternative project that will address the issues. An appropriate project would be one that retains the feel of a new, modern building, and that recognizes its location on Wilshire Boulevard while acknowledging that it is on a transitional site. It is commendable that the Applicant has oriented the project toward the Wilshire end of the site, but additional changes and mitigation measures are needed to maintain neighborhood character.

#### **Response to Comment No. 16-15**

The Draft EIR included an analysis of four alternatives to the proposed project. See Section VI. Alternatives, for more details. Consistent with CEQA, these alternatives are intended to substantially reduce or eliminate the significant impact of the proposed project while still meeting most of the project objectives. As the commenter does not propose any specific alternative or mitigation, no further response is possible.

**From:** <amyg93@aol.com>  
**To:** <jimmy.liao@lacity.org>  
**Date:** 9/29/2009 10:06 AM  
**Subject:** Wilshire and Crescent Heights,

Dear Sir:

What is going on???? Our infrastructure cannot hold all this development.

Is there no end to this?? As it is, the residents that live here cannot get thru and now this.

Please, please do something to prevent this useless project.

Amy galaudet

Tom Challenger

6120 W. 5th St.

Los Angeles, Calif 90048

17-1

**LETTER NO. 17**

Amy Galaudet and Tom Challener  
6120 W. 5<sup>th</sup> Street  
Los Angeles, CA 90048

**Comment No. 17-1**

What is going on???? Our infrastructure cannot hold all this development.

Is there no end to this.? As it is, the residents that live here cannot get thru and now this.

Please, please do something to prevent this useless project.

**Response to Comment No. 17-1**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**From:** <mjw@wakimlaw.com>  
**To:** "Jimmy Liao" <Jimmy.Liao@lacity.org>  
**CC:** <mjw@wakimlaw.com>  
**Date:** 9/29/2009 1:40 PM  
**Subject:** Re: Wilshire Crescent Heights - Resident Comment(ENV-2008-0729-EIR)

Thank you for your response, Jimmy. I look forward to meeting you if we have that opportunity.

It is important to discuss the impact a multi-residential project would have on an area that is already saturated with properties available for leasing. Nonetheless, I also have the following concern about traffic, which probably fits more squarely within the DEIR.

18-1

The proposed project would change 6th Street into an East/West throughfare for the project's additional residents, their guests, service vehicles, etc. That would occur because the proposed building, on a corner property, would use both Wilshire and Crescent Heights for direct access, and also 6th, Orange, and Fairfax for indirect access.

18-2

Traffic to and from the building naturally would flow one block north to 6th, especially to head East, rather than sit at an extra light for Wilshire.

This kind of change would substantially, and negatively, impact a neighborhood that still feels like a "neighborhood" in Los Angeles. 6th Street only has one lane in either direction, with parking and no bike lane. It is also lined with sycamores and front yards.

18-3

In my opinion, the proposed concentration of residents is way too high and poses an unnecessary challenge to the area. Traffic at the intersections of Fairfax/Third and Fairfax/Beverly is unmanageable at times, largely due to the Palazzo project adding to the stress contributed by Park LaBrea and the rest of the neighborhood. I think similar concerns exist here at the intersections of Wilshire/Cres. Hghts., Wilshire/Fairfax, and 6th/Fairfax.

18-4

Please tell me what are the next steps prior to submitting the final EIR? Also, how may the public continue to participate during the entire review process? I would like to learn more and make a positive contribution.

18-5

Yours truly,

Mark Wakim

**LETTER NO. 18**

Mark J. Wakim  
Attorney at Law  
P.O. Box 481130  
Los Angeles, CA 90048  
mjw@wakimlaw.com

**Comment No. 18-1**

Thank you for your response, Jimmy. I look forward to meeting you if we have that opportunity.

It is important to discuss the impact a multi-residential project would have on an area that is already saturated with properties available for leasing. Nonetheless, I also have the following concern about traffic, which probably fits more squarely within the DEIR.

**Response to Comment No. 18-1**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**Comment No. 18-2**

The proposed project would change 6th Street into an East/West throughfare for the project's additional residents, their guests, service vehicles, etc. That would occur because the proposed building, on a corner property, would use both Wilshire and Crescent Heights for direct access, and also 6th, Orange, and Fairfax for indirect access.

Traffic to and from the building naturally would flow one block north to 6th, especially to head East, rather than sit at an extra light for Wilshire.

**Response to Comment No. 18-2**

The comment speculates that most of the project traffic will utilize 6<sup>th</sup> Street. As stated in Section IV.L, Traffic and Transportation, observations of the study area indicate that existing traffic congestion throughout the area, particularly during peak commute traffic periods on Wilshire Boulevard, 6<sup>th</sup> Street, Crescent Heights Boulevard, and Fairfax Avenue result in high utilization of many of the local/residential streets in the area by commuters and local residents seeking to avoid long delays. The anticipated increases in area traffic resulting from both ambient traffic growth and ongoing development are expected to exacerbate this “cut through” traffic, and it is likely that some project visitors, patrons, and/or employees will themselves use some of the area residential streets as alternative travel routes to and from the project site.

Therefore, an additional analysis was conducted to determine the potential for project impacts on the segments of La Jolla Avenue between 6th Street and Wilshire Boulevard, and along Orange Street adjacent to the project site, and to the west of Crescent Heights Boulevard. These locations were selected as the local/residential street segments most likely to be impacted by the project's traffic, as they will exhibit the potentially highest project traffic additions, as vehicles converge on the project site from around the project area. The results of the analysis of potential neighborhood traffic impacts are summarized in Table IV.L-8 of the Draft EIR.

As shown in Table IV.L-8, the development of the project is not expected to produce significant traffic impacts on any of the local/residential street segments analyzed. Although it is expected that project traffic will occur on these, and possibly other, local/residential streets in the general vicinity as project residents, visitors, patrons, and employees travel to and from the new development, these project-related volumes will be well below the thresholds for significance. Nonetheless, the applicant has volunteered to work with the community, LADOT, and the local Council Office to identify potential measures to address residents' concerns regarding cut through traffic.

### **Comment No. 18-3**

This kind of change would substantially, and negatively, impact a neighborhood that still feels like a "neighborhood" in Los Angeles. 6th Street only has one lane in either direction, with parking and no bike lane. It is also lined with sycamores and front yards.

### **Response to Comment No. 17-3**

This comment is noted for the record. Please see the response to comment 17-2, above.

### **Comment No. 18-4**

In my opinion, the proposed concentration of residents is way too high and poses an unnecessary challenge to the area. Traffic at the intersections of Fairfax/Third and Fairfax/Beverly is unmanageable at times, largely due to the Palazzo project adding to the stress contributed by Park LaBrea and the rest of the neighborhood. I think similar concerns exist here at the intersections of Wilshire/Cres. Hghts., Wilshire/Fairfax, and 6th/Fairfax.

### **Response to Comment No. 18-4**

The comment expressed an opinion regarding existing traffic conditions. The Draft EIR included an analysis of cumulative impacts and identified the future levels of service at the study intersections for both the without project and with project scenarios, as well as the potential incremental project traffic impacts at each location.

The results of the analyses contained above indicate that the proposed project could potentially result in significant traffic impacts at three of the 11 study intersections during one or both peak hours at : 6th Street and Fairfax Avenue (PM peak hour); Wilshire Boulevard and Crescent Heights

Boulevard/McCarthy Vista (AM peak hour); and Wilshire Boulevard and Fairfax Avenue (both peak hours). Therefore, a review of the existing intersection and roadway geometries and operations was undertaken to identify feasible roadway system improvements to mitigate these potential impacts. The area roadway system is currently substantially improved, and there are few available rights-of-way or unimproved roadway segments with which to construct any meaningful new roadway or intersection capacities. Additionally, the area traffic signal network has already been upgraded with both the ATSAC and second-generation ATCS signal coordination systems, and no additional signal operation enhancements are available. Therefore, potential mitigation measures have been incorporated into this project. However, the mitigation measures for this project are relegated to operational improvements based on the forecast traffic demand patterns, such as converting the operations of existing lanes to better accommodate future travel patterns, or the addition of short turn lanes to improve “through” traffic movements at the intersections, where feasible.

**Comment No. 18-5**

Please tell me what are the next steps prior to submitting the final EIR? Also, how may the public continue to participate during the entire review process? I would like to learn more and make a positive contribution.

**Response to Comment No. 18-5**

This Final EIR is being prepared to respond to comments on the Draft EIR submitted during the review period. The Final EIR modifies the Draft EIR as required. Public hearings on the proposed project will be held after completion of the Final EIR. The City will make the Final EIR available to agencies and the public prior to considering certification of the EIR and approval of the project. Notice of the time and location will be published prior to the public hearing date.

20 September 2009

Mr. Jimmy Liao – EIR Unit  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

SEP 29 2009

ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Liao,

My name is Christine Scotti and I am writing on behalf of a group of residents, myself included, at 6151 Orange Street. We are located within the immediate area of the proposed Wilshire Crescent Project and as residents of this community we would like to voice our opposition to this project.

19-1

We are deeply concerned with issues that have been raised in the draft EIR provided by the LA Department of City Planning as well as other issues not brought up. The most significant of these issues being the following:

1. Traffic and Transportation

We are already heavily burdened with traffic from Fairfax Avenue on the east and Crescent Heights on the west. Additionally, there are two 99¢ stores in the immediate area (Wilshire & Fairfax and Fairfax & 6<sup>th</sup> St), placing another traffic burden on Orange Street. Residents of Orange Street that are traveling in both the east and west directions are subjected to significant delays in gaining access to and from our street because of the inadequate parking lot design at the Wilshire/Fairfax store. This lot does not have a pass through, requiring people to back in and out of one side of the lot thereby trapping anyone who is trying to travel up or down Orange Street. At the same time, people are trying to access the Fairfax/6<sup>th</sup> St store through the alley behind the store parallel to Fairfax Ave, and this causes additional delays, accidents, and back-ups along the east end of our street.

19-2

Per the draft EIR, there will be a significant increase in traffic at multiple intersections in the immediate area. The three most significant areas, Wilshire/Crescent Heights, Wilshire/Fairfax, and Fairfax/6<sup>th</sup> Street currently surround Orange Street. The draft EIR notes a conservative estimate of an increase in the number of daily trips to be approximately 1,655 across these three intersections, which will result in a significant increase in the amount of traffic and transportation along Orange Street. Our street is constantly used as a "cut-through" for people trying to avoid the traffic congestion at these three intersections. We deal with an influx of cars cutting up and down our street on a daily basis - most with no regard for the speed limit and at all hours of the day and this will only intensify if this proposed development is approved.

19-3

Lastly, the draft EIR states that at these intersections there are "no feasible physical

19-4

improvements available to mitigate the project's impact at these locations." This proposed development would create additional blockage at the east end of Orange Street as well as significant blockage at the west end of Orange Street and there are no improvements to be made at either end of Orange Street that would help alleviate this congestion for the residents.

19-4

## 2. Noise and Vibration Levels

In addition to the permanent increase in noise and vibrations levels as a result of the significant traffic/transportation increase, we are concerned with the increase in noise and vibration levels during the 18-month construction period. From 7AM-9PM, six days a week, residents would be subjected to intense vibration and noise increases from heavy equipment, generators, high-powered tools as a result of the demolition, clearing, and construction of the proposed development.

19-5

It is also our understanding that city of Los Angeles METRO plans a subway stop at the Wilshire/Fairfax intersection within the next several years which again is going to create huge environmental, parking/traffic issues, and noise and vibration issues within very close proximity of the planned development.

19-6

Additionally, during the construction process there are invariably areas of the adjoining streets that are cordoned as parking spaces for heavy equipment, which increases the noise and vibration levels to the residential area while this equipment is moved in and out of the project site.

19-7

## 3. Aesthetics, Views and Obstructions

Contrary to the draft EIR report, the residents of 6151 Orange Street do not feel that the proposed project would add any significant visual character or aesthetic quality to our neighborhood. Based on the provided rendering, the building shows no unique architectural or design characteristics that set it apart from any of the immediately surrounding buildings. We do not feel, nor necessarily want, another tall building contributing to "a more dynamic landscape and skyline." We also do not feel that the proposed development would complement any of the other uses within the area. From where we reside, it will look like another concrete and glass tower with a fresh coat of paint.

19-8

For the residents on the south side of the building and for those residents who are utilizing the pool facilities on the top of the building, their southwest view would be completely obstructed as a result of this proposed structure.

Most importantly, the quality of a city view is taken into consideration in property valuation. Contrary to the EIR, the building would obstruct the view of south facing residences thereby further reducing property values in an already declining market.

19-9

At present we have a significant and unobstructed view toward the southwest, which provides us with a clear, open view of the sky, trees and on clearer days, the South Bay area and the Pacific Ocean. Again, contrary to the draft EIR, we VALUE

this view and do not wish to have it disappear for the sake of this proposed development.

19-9

#### 4. Winter Shade/Shadows

According to the draft EIR, there will be significant impact on our neighborhood with regards to winter shade and shadows. The winter shade/shadows would directly affect adjacent properties resulting in a loss of natural light and warmth for the residents in the immediate area and within these properties.

19-10

#### 5. LEED Construction Practices

As residents of 6151 Orange Street, we were very disheartened at the lack of accountability this proposed development will have in the role of global climate change. While it may be true that this specific project is too small to have any significant impact on global climate change, it is this type of rhetoric that will continue to let companies skate by the issue of global warming. Yes, one project alone may not have an impact, but the thousands of current projects under construction in the Los Angeles Metropolitan Area do have a significant negative impact on global climate change. To not hold companies accountable for the practices used in the construction of large-scale developments such as these we are turning a blind eye to the negative impacts on the environment that these projects have.

19-11

While the development company states that the residential portion of their development will be “constructed to maximize building efficiency with *LEED* characteristics...” there are substantially more *LEED* practices that could be and should be implemented for a project of this magnitude. At a minimum, we should demand that the proposed development implement the following *LEED* programs:

- *LEED Core & Shell* - practices which covers base building elements such as structure, envelope and the HVAC system
- *LEED New Construction* - which includes the incorporation of recycled materials, using certified wood and recycling construction debris
- *LEED for Commercial Interiors* - which covers sustainable sites, water efficiency, energy and atmosphere, materials and resources, indoor environmental quality, and innovative applications

19-12

#### 6. Public Service Resources

In addition to the current proposed development, there are several other developments within the immediate area (less than 1 mile from the site) that would rely on public service resources; fire, police, parks & recreation, and library. On Wilshire Blvd alone, there are currently four new developments or redevelopments which are under construction including:

19-13

- a. Wilshire & La Brea - 14 story mixed-use development, 645 residential units

b. 5528-5500 Wilshire Blvd – 11 story mixed-use redevelopment, 175 residential units

c. 5550 Wilshire Blvd – 6 story mixed use development, 163 residential condominiums

d. 5600 Wilshire Blvd – 6 story mixed use development, 284 residential units. Ground floor commercial currently only occupied by one tenant.

e. 637 S. Fairfax Blvd – 7 story mixed use development, ~30 residential condos. Currently this property is in foreclosure after a failed sales and lease effort. Currently, there are only ~4 units leased and the ground floor commercial currently has no tenants.

This totals approximately 1300 residential units with a one-mile vicinity of the proposed development.

Contrary to the draft EIR, we feel this puts a heavy burden on our public resources, most of which are facing serious budget cuts due to the financial crisis that the city of Los Angeles is currently experiencing. As recent as one week ago, it was revealed that city employees, including accountants, building planners, librarians and maintenance crews were facing layoffs and furloughs.

The city has already laid off 300 police cadets and is considering a proposal to freeze LAPD hiring. The Fire Department has been instructed to cut salaries and has already begun taking fire trucks and ambulances out of service.

As residents of this community, we feel that this and many other development companies are operating under the “If you build it, they will come” mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

We ask that the Los Angeles Department of City Planning support us in opposing this proposed development.

Sincerely,



Christine Kollig Scotti  
6151 Orange Street, #316  
Los Angeles, CA 90048  
323.842.4032  
cscotti@me.com

19-13

19-14

**LETTER NO. 19**

Christine Scotti  
6151 Orange Street, #316  
Los Angeles, CA 90048  
cscotti@me.com

**Comment No. 19-1**

My name is Christine Scotti and I am writing on behalf of a group of residents, myself included, at 6151 Orange Street. We are located within the immediate area of the proposed Wilshire Crescent Project and as residents of this community we would like to voice our opposition to this project

We are deeply concerned with issues that have been raised in the draft EIR provided by the LA Department of City Planning as well as other issues not brought up. The most significant of these issues being the following:

**Response to Comment No. 19-1**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**Comment No. 19-2****1. Traffic and Transportation**

We are already heavily burdened with traffic from Fairfax Avenue on the east and Crescent Heights on the west. Additionally, there are two 99¢ stores in the immediate area (Wilshire & Fairfax and Fairfax & 6th St), placing another traffic burden on Orange Street. Residents of Orange Street that are traveling in both the east and west directions are subjected to significant delays in gaining access to and from our street because of the inadequate parking lot design at the Wilshire/Fairfax store. This lot does not have a pass through, requiring people to back in and out of one side of the lot thereby trapping anyone who is trying to travel up or down Orange Street. At the same time, people are trying to access the Fairfax/6th St store through the alley behind the store parallel to Fairfax Ave, and this causes additional delays, accidents, and back-ups along the east end of our street.

**Response to Comment No. 19-2**

The comment expresses opinions regarding existing traffic conditions in the vicinity of the project site. An additional analysis was conducted to determine the potential for project impacts on the segments of La Jolla Avenue between 6th Street and Wilshire Boulevard, and along Orange Street adjacent to the project site, and to the west of Crescent Heights Boulevard. Results of this analysis are shown in Table IV.L-8 of

the Draft EIR. The analysis showed that there would be no significant impact to Orange Street from the project. Nonetheless, the applicant has volunteered to work with the community, LADOT, and the local Council Office to identify potential measures to address residents' concerns regarding cut through traffic.

### **Comment No. 19-3**

Per the draft EIR, there will be a significant increase in traffic at multiple intersections in the immediate area. The three most significant areas, Wilshire/Crescent Heights, Wilshire/Fairfax, and Fairfax/6th Street currently surround Orange Street. The draft EIR notes a conservative estimate of an increase in the number of daily trips to be approximately 1,655 across these three intersections, which will result in a significant increase in the amount of traffic and transportation along Orange Street. Our street is constantly used as a "cut-through" for people trying to avoid the traffic congestion at these three intersections. We deal with an influx of cars cutting up and down our street on a daily basis - most with no regard for the speed limit and at all hours of the day and this will only intensify if this proposed development is approved.

### **Response to Comment No. 19-3**

The results of the analyses indicate that the proposed project could potentially result in significant traffic impacts at three of the 11 study intersections during one or both peak hours; at 6th Street and Fairfax Avenue (PM peak hour), at Wilshire Boulevard and Crescent Heights Boulevard/McCarthy Vista (AM peak hour), and at Wilshire Boulevard and Fairfax Avenue (both peak hours). The Draft EIR acknowledges significant and unavoidable impacts from these impacts.

As stated in Section IV.L, Traffic and Transportation, observations of the study area indicate that existing traffic congestion throughout the area, particularly during peak commute traffic periods on Wilshire Boulevard, 6th Street, Crescent Heights Boulevard, and Fairfax Avenue result in high utilization of many of the local/residential streets in the area by commuters and local residents seeking to avoid long delays. The anticipated increases in area traffic resulting from both ambient traffic growth and ongoing development are expected to exacerbate this "cut through" traffic, and it is likely that some project visitors, patrons, and/or employees will themselves use some of the area residential streets as alternative travel routes to and from the project site.

Therefore, an additional analysis was conducted to determine the potential for project impacts on the segments of La Jolla Avenue between 6th Street and Wilshire Boulevard, and along Orange Street adjacent to the project site, and to the west of Crescent Heights Boulevard. These locations were selected as the local/residential street segments most likely to be impacted by the project's traffic, as they will exhibit the potentially highest project traffic additions, as vehicles converge on the project site from around the project area. The results of the analysis of potential neighborhood traffic impacts are summarized in Table IV.L-8 of the Draft EIR.

As shown in Table IV.L-8, the development of the project is not expected to produce significant traffic impacts on any of the local/residential street segments analyzed. Although it is expected that project

traffic will occur on these, and possibly other, local/residential streets in the general vicinity as project residents, visitors, patrons, and employees travel to and from the new development, these project-related volumes will be well below the thresholds for significance.

#### **Comment No. 19-4**

Lastly, the draft EIR states that at these intersections there are "no feasible physical improvements available to mitigate the project's impact at these locations." This proposed development would create additional blockage at the east end of Orange Street as well as significant blockage at the west end of Orange Street and there are no improvements to be made at either end of Orange Street that would help alleviate this congestion for the residents.

#### **Response to Comment No. 19-4**

The traffic study identified potentially significant impacts from project traffic at Wilshire and Fairfax (both peak hours), Wilshire and Crescent Heights (a.m. peak hour only), and 6<sup>th</sup> Street and Fairfax (p.m. peak hour only). The project would not have significant impacts at 6<sup>th</sup> Street and Crescent Heights, which would continue to operate at Level of Service (LOS) A in both the a.m. and p.m. peak hour. The traffic study identified mitigation measures at all three potentially impacted intersections to reduce these impacts, but LADOT rejected the measures proposed for Wilshire Boulevard and Crescent Heights and Wilshire Boulevard and Fairfax. The effectiveness of the recommended traffic signal improvements at 6<sup>th</sup> Street and Fairfax Avenue will be ultimately evaluated by LADOT staff in their review of the feasibility of these measures. This measure is consistent with the Mayor's directive to install new left-turn phasing at key intersections throughout the City, in order to address ongoing and increasing traffic congestion. However, in order to provide the most conservative assessment, the Draft EIR concludes that the impact will remain significant despite the mitigation. Similarly, the project's traffic impacts were analyzed without taking into account the project's traffic demand management (TDM) program, which will include measures to reduce project-related vehicle trips.

#### **Comment No. 19-5**

##### 2. Noise and Vibration Levels

In addition to the permanent increase in noise and vibrations levels as a result of the significant traffic/transportation increase, we are concerned with the increase in noise and vibration levels during the 18-month construction period. From 7AM-9PM, six days a week, residents would be subjected to intense vibration and noise increases from heavy equipment, generators, high-powered tools as a result of the demolition, clearing, and construction of the proposed development.

#### **Response to Comment No. 19-5**

The Draft EIR includes mitigation measures that would be required to reduce noise and vibration levels associated with construction at the project upon the adjacent multi-family residences. However, the Draft EIR acknowledges that there would be significant and unavoidable impacts from construction noise and

vibration. In the context of CEQA analysis, the term “temporary construction impacts” is used to identify environmental impacts of constructing a specific project (to the extent reasonably feasible) so that such temporary impacts can be mitigated to the extent reasonably feasible. “Temporary construction impacts” end once a specific project is completed, as distinguished from a project’s continuing “operational” environmental impacts, which continue while the project is occupied and operating. CEQA analysis tends to focus on temporary construction impacts that are more localized in the nature of their environmental impacts (for example, construction equipment noise or emissions) because they are more susceptible to standards of significance and mitigation. Construction activities, as a more generalized condition of urban life and activities tend to be less susceptible to segregation, quantification, standards of significance and mitigation.

The applicant has revised the construction hours as stated in the Draft EIR from 7 a.m. to 9 p.m. Monday through Saturday to 7:00 a.m. to 6:00 p.m. Monday through Friday 8:00 a.m. to 6:00 p.m. on Saturday. Additionally, concrete pours would be restricted to 7:00 a.m. to 7:00 p.m. Monday through Friday. Please see Section III, Additions and Corrections, of this Final EIR for the revised information.

#### **Comment No. 19-6**

It is also our understanding that city of Los Angeles METRO plans a subway stop at the Wilshire/Fairfax intersection within the next several years which again is going to create huge environmental, parking/traffic issues, and noise and vibration issues within very close proximity of the planned development.

#### **Response to Comment No. 19-6**

The proposed project site is located along the route of the Westside Subway Extension that was approved by the voters of Los Angeles County through the passage of Measure R in November 2008. An Alternatives Analysis Study was completed in January 2009 and a Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) is currently being prepared. The Draft EIS/EIR will analyze impacts to traffic and circulation around the proposed stations.

#### **Comment No. 19-7**

Additionally, during the construction process there are invariably areas of the adjoining streets that are cordoned as parking spaces for heavy equipment, which increases the noise and vibration levels to the residential area while this equipment is moved in and out of the project site.

#### **Response to Comment No. 19-7**

See Response to Comment No. 19-5.

#### **Comment No. 19-8**

3. Aesthetics, Views and Obstructions

Contrary to the draft EIR report, the residents of 6151 Orange Street do not feel that the proposed project would add any significant visual character or aesthetic quality to our neighborhood. Based on the provided rendering, the building shows no unique architectural or design characteristics that set it apart from any of the immediately surrounding buildings. We do not feel, nor necessarily want, another tall building contributing to "a more dynamic landscape and skyline." We also do not feel that the proposed development would complement any of the other uses within the area. From where we reside, it will look like another concrete and glass tower with a fresh coat of paint.

### **Response to Comment No. 19-8**

The project site is located within an established commercial neighborhood containing a mix of buildings. Implementation of the proposed project would replace a surface parking lot and a one-story bank building with a new, contemporary building that is visually compatible with the several newer or recently renovated high rise buildings in the vicinity of the project site. The area is slowly undergoing redevelopment to create a more dynamic landscape and skyline reflective of the scale of Wilshire Boulevard as a major transportation and activity corridor. The proposed project does not distract from the unique image of other buildings in the area, but rather complements other uses. The building, as designed, is modern in style and is intended to lend a complementary, yet distinct, commercial character which would be integrated into the Wilshire Boulevard street frontage, as well as the overall project design. This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

### **Comment No. 19-9**

For the residents on the south side of the building and for those residents who are utilizing the pool facilities on the top of the building, their southwest view would be completely obstructed as a result of this proposed structure.

Most importantly, the quality of a city view is taken into consideration in property valuation. Contrary to the EIR, the building would obstruct the view of south facing residences thereby further reducing property values in an already declining market. At present we have a significant and unobstructed view toward the southwest, which provides us with a clear, open view of the sky, trees and on clearer days, the South Bay area and the Pacific Ocean. Again, contrary to the draft EIR, we VALUE this view and do not wish to have it disappear for the sake of this proposed development.

### **Response to Comment No. 19-9**

Views from locations on private property are not protected under CEQA or by the City of Los Angeles CEQA Thresholds. Views of the project site would not obstruct, totally block, partially interrupt or create a minor diminishment of a valued public view or provide a visual element that would considerably deter from a valued public view as there are no valued public views in the immediate vicinity. Therefore there

would be no significant impact on public views associated with the Proposed Project. The comment does not identify a specific flaw of the Draft EIR and expresses opinions about the project and property values. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

#### **Comment No. 19-10**

##### 4. Winter Shade/Shadows

According to the draft EIR, there will be significant impact on our neighborhood with regards to winter shade and shadows. The winter shade/shadows would directly affect adjacent properties resulting in a loss of natural light and warmth for the residents in the immediate area and within these properties.

#### **Response to Comment No. 19-10**

The Draft EIR acknowledges significant and unavoidable impacts to shade/shadow. See Section IV.B. Aesthetics of the Draft EIR.

#### **Comment No. 19-11**

##### 5. LEED Construction Practices

As residents of 6151 Orange Street, we were very disheartened at the lack of accountability this proposed development will have in the role of global climate change. While it may be true that this specific project is too small to have any significant impact on global climate change, it is this type of rhetoric that will continue to let companies skate by the issue of global warming. Yes, one project alone may not have an impact, but the thousands of current projects under construction in the Los Angeles Metropolitan Area do have a significant negative impact on global climate change. To not hold companies accountable for the practices used in the construction of large-scale developments such as these we are turning a blind eye to the negative impacts on the environment that these projects have.

#### **Response to Comment No. 19-11**

The Draft EIR included an analysis of the project's contribution to global warming. At the time that this Draft EIR was being prepared, no air agency or municipality had yet established project-level significance thresholds for GHG emissions. As such, GHG emissions were quantified, but could not be used to determine significance under CEQA. The proposed project would be consistent with the 2006 CAT Report strategies and incorporate several design features that exceed Title 24 Standards. Therefore, the implementation of the proposed project would not result in an unplanned level of development and does not represent a substantial new source of GHG emissions. For these reasons, the impact of the project to the cumulative effect of global climate change is not cumulatively considerable and is, therefore, considered to be less than significant.

**Comment No. 19-12**

While the development company states that the residential portion of their development will be "constructed to maximize building efficiency with LEED characteristics ..." there are substantially more LEED practices that could be and should be implemented for a project of this magnitude. At a minimum, we should demand that the proposed development implement the following LEED programs:

- *LEED Core & Shell* - practices which covers base building elements such as structure, envelope and the HVAC system

- *LEED New Construction* - which includes the incorporation of recycled materials, using certified wood and recycling construction debris

- *LEED for Commercial Interiors* - which covers sustainable sites, water efficiency, energy and atmosphere, materials and resources, indoor environmental quality, and innovative applications

**Response to Comment No. 19-12**

The proposed project would be constructed to maximize building efficiency with LEED characteristics. The proposed project has been registered for LEED "New Construction." LEED for "Core & Shell" requirements to not apply as those aspects are covered in "New Construction," which is much more comprehensive. LEED for "Commercial Interiors" refers to future tenant improvements for commercial tenants. The comment does not identify a specific flaw of the Draft EIR and expresses opinions about the project and the level of LEED practices that would be implemented. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**Comment No. 19-13****6. Public Service Resources**

In addition to the current proposed development, there are several other developments within the immediate area (less than 1 mile from the site) that would rely on public service resources; fire, police, parks & recreation, and library. On Wilshire Blvd alone, there are currently four new developments or redevelopments which are under construction including:

- a. Wilshire & La Brea -14 story mixed-use development, 645 residential units
- b. 5528-5500 Wilshire Blvd -11 story mixed-use redevelopment, 175 residential units
- c. 5550 Wilshire Blvd - 6 story mixed use development, 163 residential condominiums
- d. 5600 Wilshire Blvd - 6 story mixed use development, 284 residential units. Ground floor commercial currently only occupied by one tenant.

e. 637 S. Fairfax Blvd - 7 story mixed use development, ~ 30 residential condos. Currently this property is in foreclosure after a failed sales and lease effort. Currently, there are only ~ 4 units leased and the ground floor commercial currently has no tenants.

This totals approximately 1300 residential units with a one-mile vicinity of the proposed development.

Contrary to the draft EIR, we feel this puts a heavy burden on our public resources, most of which are facing serious budget cuts due to the financial crisis that the city of Los Angeles is currently experiencing. As recent as one week ago, it was revealed that city employees, including accountants, building planners, librarians and maintenance crews were facing layoffs and furloughs.

The city has already laid off 300 police cadets and is considering a proposal to freeze LAPD hiring. The Fire Department has been instructed to cut salaries and has already begun taking fire trucks and ambulances out of service.

### **Response to Comment No. 19-13**

The Draft EIR included an analysis of cumulative impacts to public services, which included a list of related projects in a specified geographic area. All proposed (those with pending applications), recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment when considered in conjunction with the proposed project are included in the EIR.

### **Comment No. 19-14**

As residents of this community, we feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

We ask that the Los Angeles Department of City Planning support us in opposing this proposed development

### **Response to Comment No. 19-14**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**Sally Boehm**

**From:** deniselampron@aol.com  
**Sent:** Tuesday, September 01, 2009 5:12 PM  
**To:** BETTY.WONG@LACITY.ORG  
**Subject:** Wilshire Crescent Heights Project | EIR Case No. ENV-2008-0729-EIR

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SEP 29 2009

ENVIRONMENTAL  
UNIT

Ms. Wong,

As our Neighborhood Empowerment Analyst for the Mid City West Community Council, I am writing to you regarding the above matter.

As a resident within the Mid City West Community Council (6151 Orange Street), my neighbors and I are deeply concerned about the pending project at Wilshire and Crescent Heights and would like to contact our neighborhood council representative. Are you this individual or can you direct me to this person?

20-1

We are already heavily burdened with traffic from Fairfax Avenue on the east and Crescent Heights on the west. Additionally, there are two 99¢ stores in the immediate area placing another traffic burden on Orange Street.

20-2

Last year there was a large condo construction project at the corner of 6th and Fairfax, resulting in few if any sales. It is basically a vacant building, which raises other concerns of vagrancy.

20-3

I understand that METRO plans a subway stop at Wilshire and Fairfax in the next several years which again is going to create huge environmental, parking and traffic issues within very close proximity of the planned development.

20-4

My neighbors and I would like to discuss all of the above issues with our representative as soon as possible. From the paperwork presented by the City of Los Angeles, we have until September 28, 2009 to submit our requests/concerns.

20-5

Thank you,  
Denise Lampron  
6151 Orange Street, Unit 319  
Los Angeles, CA 90048-4855

**LETTER NO. 20**

Denise Lampron  
6151 Orange Street, Unit 319  
Los Angeles, CA 90048-4855

**Comment No. 20-1**

As our Neighborhood Empowerment Analyst for the Mid City West Community Council, I am writing to you regarding the above matter.

As a resident within the Mid City West Community Council (6151 Orange Street), my neighbors and I are deeply concerned about the pending project at Wilshire and Crescent Heights and would like to contact our neighborhood council representative. Are you this individual or can you direct me to this person?

**Response to Comment No. 20-1**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. This comment was forwarded to Jimmy Liao with the City of Los Angeles Department of City Planning.

**Comment No. 20-2**

We are already heavily burdened with traffic from Fairfax Avenue on the east and Crescent Heights on the west. Additionally, there are two 99¢ stores in the immediate area placing another traffic burden on Orange Street.

**Response to Comment No. 20-2**

The Draft EIR included an analysis of traffic impacts and identified the future levels of service at the study intersections for both the without project and with project scenarios, as well as the potential incremental project traffic impacts at each location.

The comment provides an opinion as to existing traffic conditions in the vicinity of the project site. This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA.

**Comment No. 20-3**

Last year there was a large condo construction project at the corner of 6th and Fairfax, resulting in few if any sales. It is basically a vacant building, which raises other concerns of vagrancy.

**Response to Comment No. 20-3**

The issue raised by the comment express concern regarding economic and social conditions that are experienced by persons living today in high density urban areas such as the general area of the project. CEQA analysis is focused on impacts on the physical environment rather than economic or social conditions. Therefore, no analysis of economic issues is required or included in the Draft EIR. This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR.

**Comment No. 20-4**

I understand that METRO plans a subway stop at Wilshire and Fairfax in the next several years<sup>20</sup>which again is going to create huge environmental, parking and traffic issues within very close proximity of the planned development.

**Response to Comment No. 20-4**

The proposed project site is located along the route of the Westside Subway Extension that was approved by the voters of Los Angeles County through the passage of Measure R in November 2008. An Alternatives Analysis Study was completed in January 2009 and a Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) is currently being prepared. The Draft EIS/EIR will analyze impacts to traffic and circulation around the proposed stations. It is anticipated that the subway will reduce traffic congestion by proving an alternative mode of transportation to driving.

**Comment No. 20-5**

My neighbors and I would like to discuss all of the above issues with our representative as soon as possible. From the paperwork presented by the City of Los Angeles, we have until September 28, 2009 to submit our requests/concerns.

**Response to Comment No. 20-5**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA.

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
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Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A1-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A1-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A1-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A1**

Signature is illegible and no contact information is provided.

**Comment No. 21 A1-1**

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

**Response to Comment No. 21 A1-1**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**Comment No. 21 A1-2**

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

**Response to Comment No. 21 A1-2**

The Draft EIR includes analysis of traffic and transportation; noise and vibration; aesthetics, including winter shade/shadow; energy, and public services. The project would be required to incorporate mitigation measures to reduce impacts, where feasible. Additionally, alternatives were analyzed to further reduce impacts to shade/shadow. This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**Comment No. 21 A1-3**

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

We ask that the Mid City West Community Council support us in opposing this proposed development.

**Response to Comment No. 21 A1-3**

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

20 September 2009

Mid City West Community Council  
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UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A2-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A2-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A2-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A2**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A2**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
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RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
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Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A3-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A3-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A3-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A3**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A3**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
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UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A4-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A4-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A4-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A4**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A4**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

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UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A5-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A5-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A5-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A5**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A5**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

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Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A6-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A6-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A6-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A6**

Signature is illegible and no contact information is provided.

**Response to Letter No. 20 A6**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

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Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A7-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A7-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A7-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A7**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A7**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
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UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A8-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A8-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A8-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A8**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A8**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

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UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A9-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A9-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A9-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A9**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A9**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

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RE: EIR #ENV-2008-0729-EIR

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UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A10-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A10-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A10-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A10**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A10**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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SEP 29 2009

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UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A11-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A11-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A11-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A11**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A11**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
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SEP 29 2009

ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A12-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A12-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A12-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

*Melida Cabrera*

Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A12**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A12**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
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RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A13-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A13-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A13-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

*George Ralph Shaw*

Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A13**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A13**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A14-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A14-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A14-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely, *Marisa Richards*

Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A14**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A14**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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CITY OF LOS ANGELES

SEP 29 2009

RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A15-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A15-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A15-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A15**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A15**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
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SEP 29 2009

ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A16-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A16-2

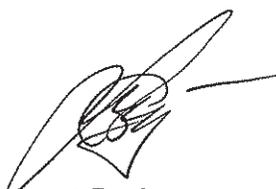
We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A16-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

MARZENA GIEUROJC



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A16**

Marzena Gieurojc

**Response to Letter No. 21 A16**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

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Mid City West Community Council  
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UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A17-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A17-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A17-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A17**

Andrew Kennedy

**Response to Letter No. 21 A17**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
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RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A18-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A18-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A18-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A18**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A18**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

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SEP 29 2009

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UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A19-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A19-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A19-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A19**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A19**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

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ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A20-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

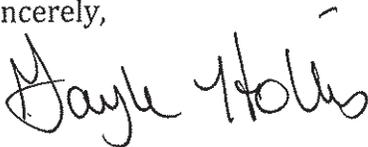
21 A20-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A20-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A20**

Gayle Hollis

**Response to Letter No. 21 A20**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
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RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A21-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A21-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A21-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A21**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A21**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
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ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A22-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A22-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A22-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A22**

Christine Yamagata

**Response to Letter No. 21 A22**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
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RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A23-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

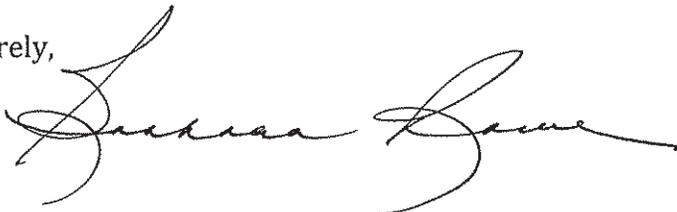
21 A23-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A23-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A23**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A23**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
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Los Angeles, CA 90036

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CITY OF LOS ANGELES

SEP 29 2009

ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A24-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A24-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A24-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

*Christina M. Peel*  
6151 Brange Street, LA, 90048

Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A24**

Christine Neel  
6151 Orange Street  
Los Angeles, CA 90048

**Response to Letter No. 21 A24**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

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ENVIRONMENTAL  
UNITY

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A25-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A25-2

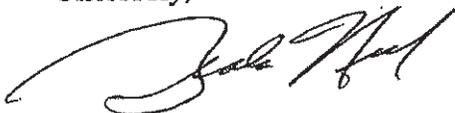
We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A25-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

6151 ORANGE ST

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A25**

Signature is illegible  
6151 Orange Street  
Los Angeles, CA 90048

**Response to Letter No. 21 A25**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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CITY OF LOS ANGELES

SEP 29 2009

RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A26-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A26-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A26-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A26**

Jane Robertson

**Response to Letter No. 21 A26**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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SEP 29 2009

RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
LIMIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A27-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A27-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A27-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A27**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A27**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
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SEP 29 2009

ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A28-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A28-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A28-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely, *Glada Sima Maydjour*  
# 109

Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A28**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A28**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
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RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A29-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A29-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A29-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A29**

Judith Brooks

**Response to Letter No. 21 A29**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
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SEP 29 2009

ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A30-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A30-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A30-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely, 

Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A30**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A30**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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CITY OF LOS ANGELES

SEP 29 2009

RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A31-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A31-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A31-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A31**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A31**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
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ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A32-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A32-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A32-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A32**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A32**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
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RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A33-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A33-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A33-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A33**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A33**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

RECEIVED  
CITY OF LOS ANGELES

SEP 29 2009

ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A34-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A34-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A34-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

**LETTER NO. 21 A34**

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A34**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.

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### III. CORRECTIONS AND ADDITIONS

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The following corrections and additions are set forth to update the Wilshire Crescent Heights Project Draft Environmental Impact Report (Draft EIR) in response to the comments received during and after the public review period. Changes to the Draft EIR are listed by chapter and page number.

#### I. INTRODUCTION

No corrections or additions are provided.

#### II. PROJECT DESCRIPTION

Page II-23 of the Draft EIR is revised as follows:

- Hours: 7 AM to 6 PM Monday through Friday and 8AM to 6PM Saturday, no hauling on Sunday or between 6 PM and 7 AM on Monday through Friday or between 6 PM and 8 AM from Friday to Saturday.

#### III. ENVIRONMENTAL SETTING

No corrections or additions are provided.

#### IV. ENVIRONMENTAL IMPACT ANALYSIS

No corrections or additions are provided.

##### A. IMPACTS FOUND LESS THAN SIGNIFICANT

No corrections or additions are provided.

##### B. AESTHETICS

Table IV.B-1 was moved to the IV.H, Land Use. Therefore, Page IV.B-10 is revised as follows:

##### *Walkability Checklist*

~~The Walkability Checklist is the City Planning Department's first step in implementing walkability objectives. The Checklist is a framework to assist planning staff in assessing the pedestrian orientation of projects subject to site plan review. Walkability is an important component of urban design. It is a vital component of livable neighborhoods, smart growth, and transit oriented areas. The checklist identifies design elements that are important in creating an active and safe pedestrian environment. Where Community Plans and/or other adopted plans provide insufficient guidance to address the broader context of urban form and designing for pedestrians, this Checklist provides details, guidance, and rationale to enhance the pedestrian perspective and meeting pedestrian's needs. Table IV.B 1 identifies goals of the~~

Walkability Checklist that apply to the proposed project and discusses the proposed project's level of attainment of these goals:

**Table IV.B-1  
Walkability Checklist**

Goals	Discussion
<p><b>Building Orientation</b></p> <ul style="list-style-type: none"> <li>● The primary entrance for pedestrians should be at grade level from the public way and be easily accessible from transit stops, with as direct a path as possible to the transit stop. Retail establishments should maintain at least one entrance from the public way with at least one door unlocked during business hours.</li> <li>● The main pedestrian entrance should be configured to be fully accessible per the ADA, such that an auxiliary approach for persons with mobility limitations would not be necessary.</li> </ul>	<p>Residential pedestrian access will be provided via a residential lobby accessible on Crescent Heights Boulevard, and Wilshire Boulevard. The retail space would be located along Wilshire Boulevard to create a commercially-oriented street level presence. As both entrances are at ground level, and the upper stories of the building are accessible by elevator, the proposed project would be fully accessible per the ADA. A bus stop is located directly in front of the proposed project site and offers a clear and accessible path to the proposed project.</p>
<p><b>Building Frontage</b></p> <ul style="list-style-type: none"> <li>● The façade should include a variety of features such as: a combination of different textures, colors and materials; distinctive architectural features; display windows; signage; setbacks and differentiated massing; rooflines; shade and shadow textures.</li> <li>● The façade should create or reinforce an existing façade rhythm.</li> <li>● Upper floor should be differentiated from the ground floor.</li> <li>● There should be no blank walls. Walls should be interesting facades by incorporating a combination of elements such as: sculpted, carved or penetrated wall surface; planters; murals; mosaics; public art; awnings; lighting.</li> <li>● The building frontage should include overhead architectural features, such as awnings, canopies, trellises or cornice treatments.</li> <li>● At corners, the building frontage should consider building cutoffs in response to any need to accommodate pedestrians and to protect pedestrian safety, security and enjoyment.</li> <li>● Any spaces created by setbacks, building cut offs and/or breaks in exterior walls should be turned into active spaces, such as active plazas or courtyards. Where appropriate given the character of the street and a sidewalk that is narrower than desired, the setback should be increased to create more space for such active plazas or courtyards and/or additional pedestrian amenities or landscaping.</li> <li>● Where there are breaks or openings in the ground floor building façade, architectural features should be applied to create continuity across the break(s).</li> </ul>	<p>The building façade would include a variety of features that would combine to create an interesting and aesthetically pleasing visual impact. Glass window walls, gridded exterior plaster patterning, aluminum accents, plaster balcony railings, strata walls, and metal grill work, would all contribute to the creation of façade rhythm and a varied visual impact. The upper floors of the building would be stepped and differentiated from the ground floor by differing design and materials including balconies. There will be no blank walls. The building, as designed, is modern in style and is intended to lend a complementary, yet distinct, commercial character which will be integrated into the Wilshire Boulevard street frontage. While the majority of the proposed project is residential in nature, the ground level retail stores would include features typical to retail uses such as, display windows, awnings, pedestrian level signs, and entrances, which would comprise 75 percent of the ground level building façade. The building would be placed on the front property line at the required setback. Massing of the project would be reduced by incorporating the residential portion of the project into a slender tower.</p>

Goals	Discussion
<ul style="list-style-type: none"> <li>The building should be placed at the front property line or at the required setback; that is, the building should not be set back further than the required setback in order to be as close as possible to the front property line and maintain a strong street wall.</li> <li>In non-residential uses, most (i.e., 75%) of the ground floor building façade should be devoted to pedestrian entrances, pedestrian level display windows and/or pedestrian level windows affording views into and out of the building interior. Display windows and other pedestrian level windows should not be covered or otherwise blocked to prevent views during regular business hours.</li> </ul>	
<p><b>On-Site Landscaping</b></p> <ul style="list-style-type: none"> <li>Canopy trees (in addition to street trees) should be provided in landscaped areas. For example, a row of trees could be provided on both sides of the sidewalk.</li> <li>Landscaping should not impede pedestrian movement or views. For example, avoid tall shrubbery immediately adjacent to the sidewalk.</li> <li>Trees should be considered especially where such additional vertical elements reinforce or contribute to the street wall and a sense of enclosure.</li> </ul>	<p>As the proposed project is located in an entirely urban environment, and the building footprint would occupy the entire site, landscaping would be similar to existing landscaping: small neat lawns bordering the site with new trees and shrubbery replacing the existing trees. Canopy trees would be planted along the sidewalk on both Crescent Heights and Wilshire Boulevards.</p>
<p><b>Off-Street Parking</b></p> <ul style="list-style-type: none"> <li>Parking should be located at the rear of the building rather than adjoining the adjacent major street.</li> <li>Alleys should be used to access the parking behind the building. If no alley is available, access should be created from a side street.</li> <li>Vehicle access into and from the site should be accommodated with as few driveways as possible to the street; and, where available, the site plan should encourage and accommodate as much vehicle access as possible from side streets and/or alleys.</li> <li>The width of each driveway should meet and not exceed the standard width identified as necessary to accommodate vehicles.</li> <li>All surface parking adjoining the street should be screened by a durable barrier and landscaping that is tall enough to at least screen car headlights.</li> <li>Easily identifiable pedestrian walkways should be provided from the parking to the sidewalk and to the entrance of the building. Techniques, such as landscaped lightwells and surface treatments, could be used.</li> <li>All parking areas and integrated pedestrian walkways should be illuminated with adequate, uniform and glare free lighting such that there is even light distribution and there are no harsh shadows.</li> <li>Driveways that have been or are to be abandoned should be reconstructed as sidewalks.</li> </ul>	<p>Parking would be located entirely within two and one-half subterranean levels of parking and four above grade parking levels. Vehicular access for retail customers will be located along Wilshire Boulevard. For residential tenants vehicular access will be located along both Wilshire Boulevard and Crescent Heights Boulevard. The existing driveways would be removed and the sidewalk repaired. The interior of the parking garage would not be visible, and no surface parking would be adjoining the street. Driveways would meet all applicable standards necessary to accommodate vehicles. Parking areas and pedestrian walkways from the parking areas to the building entrance will be adequately illuminated for safety and security reasons.</p>

Goals	Discussion
<ul style="list-style-type: none"> <li>Sub standard driveways should be reconstructed to meet current ADA requirements.</li> </ul>	
<p><b>Building Signage</b></p> <ul style="list-style-type: none"> <li>The building façade should include pedestrian scale signage, i.e., as a height and of a size that is visible to pedestrians, assists in identifying the structure and use, and facilitates access to the entrance.</li> <li>Pedestrian level lighting should be provided on building facades and around the site along pathways.</li> </ul>	<p>The proposed project would include pedestrian scale tenant signage at a pedestrian level and would be included along the retail portion of the project. Lighting would also be provided on the building façade at the pedestrian level, and around the site pathways.</p>
<p><b>Sidewalks</b></p> <ul style="list-style-type: none"> <li>The sidewalk should be continuous and straight or relatively straight.</li> <li>The landscape/furniture zone should maximize shade producing street trees, including interspersing them with existing or proposed palms.</li> <li>Shade trees should be planted as close to one another as possible.</li> <li>The landscape/furniture zone should include features that create a buffer between the sidewalk and the roadway, especially where vehicular movement is allowed in the curb lane, which separates pedestrians from moving vehicles. Such features include bollards, planters and parkways.</li> <li>The landscape/furniture zone should include street furniture.</li> <li>The landscape/furniture zone should include pedestrian level lighting. For example, such lighting could be provided with bollards that are equipped with a low level light source or mounted on decorative poles.</li> </ul>	<p>The proposed project would not dramatically change the sidewalks. The sidewalk would continue the same path as the existing sidewalk and be continuous and straight and is proposed to be the City standard nine feet wide. Trees would be added along the sidewalk similar to existing conditions and would offer shade and a visual buffer between the street and the proposed project. The project site would be illuminated with lighting from within the commercial portions of the proposed project, signage lighting and security lighting. No street furniture is proposed.</p>
<p><b>Utilities</b></p> <ul style="list-style-type: none"> <li>Utilities should be placed underground.</li> </ul>	<p>Utilities would be placed underground.</p>

As discussed above, the proposed project would be consistent with the Walkability Checklist as it applies to the proposed project. The pedestrian environment is an important asset along Wilshire Boulevard and would be enhanced by the proposed project. The project site in its current state contains no pedestrian amenities as it is a single use bank and parking lot. Therefore, implementation of the proposed project would improve the pedestrian environment by providing an attractive structure that contains ground floor retail uses available to pedestrians. Therefore, the proposed project would have a positive impact.

Pages IV.B-18 and -19 have been revised. Figures IV.B-1 and -2 have been updated to reflect a new aerial background. There are no other changes to these graphics.

Additionally, an analysis of Spring and Fall shadows were added to the Draft EIR. Therefore Page IV.B-16 is revised as follows:



Source: Google Earth Pro, 2008.



CHRISTOPHER A. JOSEPH & ASSOCIATES  
Environmental Planning and Research



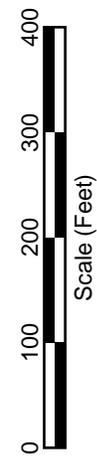
Figure IV.B-1  
Summer Solstice Shadows  
June 21st



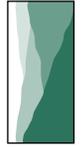


Source: Google Earth Pro, 2008.

Figure IV.B-2  
 Winter Solstice Shadows  
 December 21st



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### *Thresholds of Significance*

Determination of impacts from shadows is an objective assessment. According to the L.A. CEQA Thresholds Guide, a shadow impact is considered significant if shadow-sensitive uses (residential, recreational/parks, churches, schools, outdoor restaurants, and pedestrian areas) would be shaded by Project-related structures for more than three hours between the hours of 9:00 AM and 3:00 PM Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time (between early April and late October). For the purposes of this study the thresholds outlined above will be used. The analysis contained below analyzes the impacts of shadows generated during the summer and winter solstice, as this would depict the most extreme shadow scenario (summer solstice) and the least extreme scenario (winter solstice). The Spring and Fall Equinoxes were analyzed as well. ~~are not analyzed for this reason.~~ Further, as the existing onsite building is single-story, only minimal shadows would be expected to be generated under existing conditions.

Additionally, Page IV.B-17 is revised as follows:

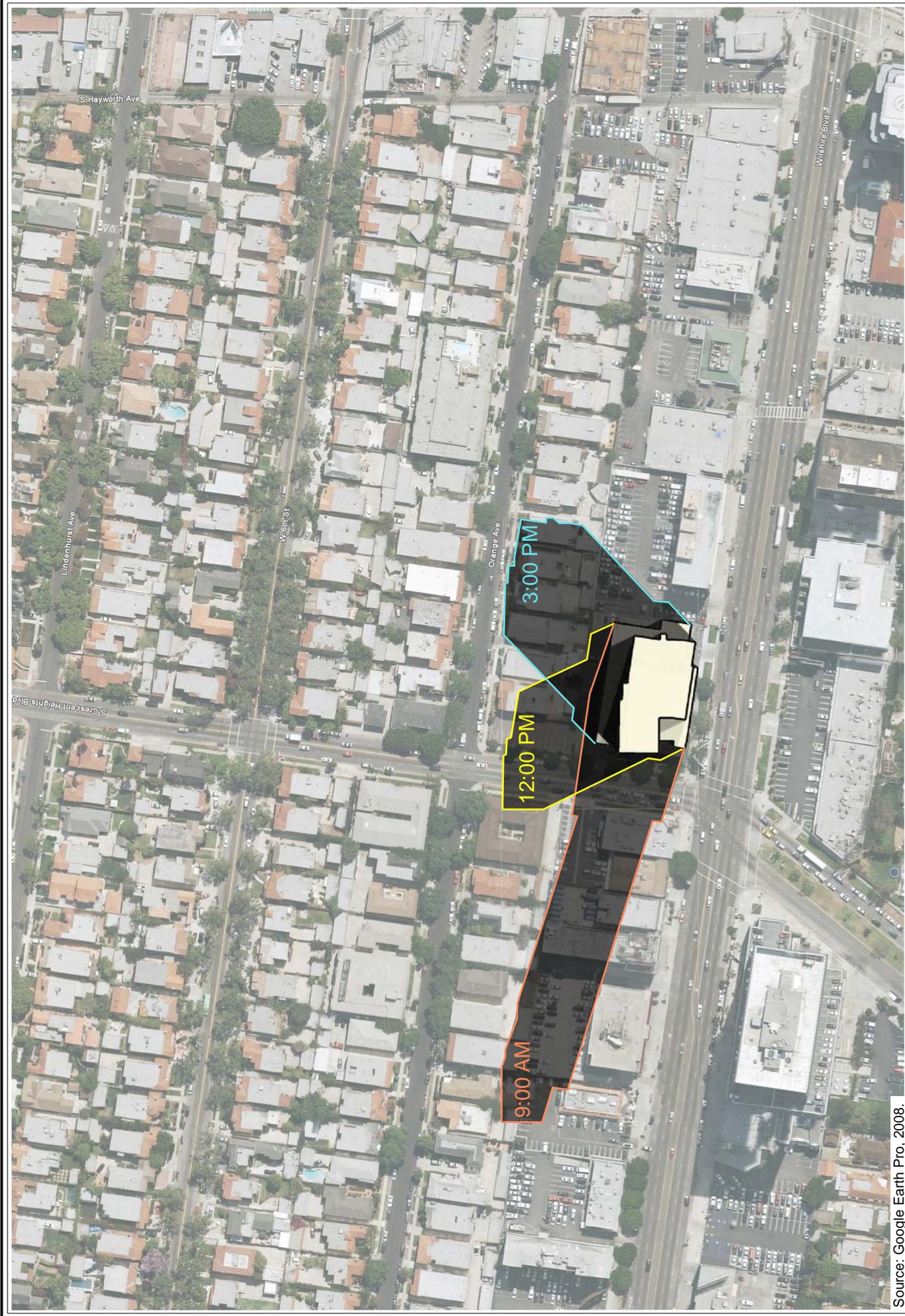
#### *Spring Shadows*

Figure IV.B-3, Spring Solstice Shadows, presents project spring shadows and the potential impacts on surrounding uses. Morning shadows at 9:00AM from the Project Site would fall west shading parking lots and portions of three commercial structures along Wilshire Boulevard to the west of Crescent Heights Boulevard and portions of three multi-family structures along Orange Avenue. By noon the shadows would shift to the north, and would be much shorter, shading a small area of the multi-family structure at the corner of Orange Avenue and Crescent Heights Boulevard, Crescent Heights Boulevard, and a portion of two multi-family structures on Orange Avenue, east of Crescent Heights Boulevard. At 3:00PM the shadows would be cast to the east, shading the adjacent surface parking lot, and portions of, or the entirety of, five multi-family structures on Orange Avenue. The carports and walkways to the two residential buildings abutting the project site would be shaded from 12:00 PM to 3:00 PM. However, these uses would not be shaded for more than 3 hours and, additionally, are not sensitive uses and their shading would not be considered an impact that exceeds the City's threshold. Consequently, there would be no spring shadow impacts to shadow-sensitive land uses surrounding the Project Site.

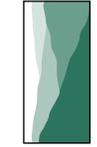
#### *Fall Shadows*

Figure IV.B-4, Fall Solstice Shadows presents fall shadows and their potential impacts on surrounding uses. At 9:00 AM, shadows would be longest towards the northwest, shading parking lots and portions of four commercial structures along Wilshire Boulevard to the west of Crescent Heights Boulevard and portions of two multi-family structures along Orange Avenue. At 1:00 PM shadows to the north would be shorter and would shade the three multi-family structures on the south side of Orange Street. At 5:00 PM the shadows shift eastward, shading either portions of or the entire building of 10 multi-family structures on the south side of Orange Street. The carports to one of the residential buildings abutting the project site would be shaded from 1:00 PM to 5:00 PM. However, these uses are not sensitive uses and

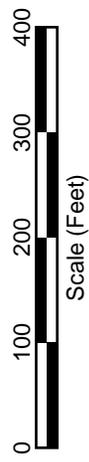




Source: Google Earth Pro, 2008.



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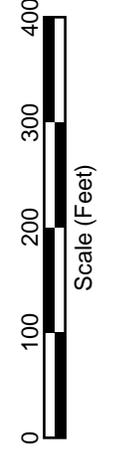
**Figure IV.B-3**  
 Spring Equinox Shadows  
 March 21st



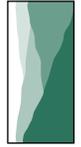


Source: Google Earth Pro, 2008.

Figure IV.B-4  
Fall Equinox Shadows  
September 21st



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their shading would not be considered an impact that exceeds the City's threshold. Consequently, there would be no fall shadow impacts to shadow-sensitive land uses surrounding the Project Site.

### C. AIR QUALITY

The Draft EIR utilized a very conservative approach to cumulative Greenhouse Gas Emission (GHG) impacts with the concept that any increase in GHG emissions from the proposed project would result in a cumulative GHG impact. However, more recent discussions among CEQA practioners such as those held during the 2009 AEP Conference have led to alternative approaches including the determination of cumulative significance based on whether a project that would enhance or impede the attainment of state GHG reduction targets. Additionally, Mitigation Measure C-6 was removed based on the less-than-significant determination for cumulative GHG impacts.

Page IV.C-32, Cumulative Greenhouse Gas Emissions, has been revised:

~~As discussed previously, the increased accumulation of GHGs in the atmosphere may result in global climate change, the consequences of which result in adverse environmental effects. The State has mandated a goal of reducing State wide emissions to 1990 levels by 2020, even though State wide population and commerce is predicted to grow substantially. The increase in residential space with implementation of the proposed project would generate greater than zero GHG emissions and the cumulative effect of global climate change would be considered incrementally cumulatively considerable. This would be considered a potentially significant cumulative impact. As discussed previously, the proposed project would generate GHG emissions. However, the proposed project would be consistent with the 2006 CAT Report strategies that would ensure that the goal of reducing State-wide emissions to 1990 levels by 2020 would be met. In addition, the proposed project would incorporate several design features that exceed Title 24 Standards and further reduce GHG emissions. As such, the impact of the project to the cumulative effect of global climate change is not cumulatively considerable and is, therefore, considered to be less than significant.~~

Page IV.C-35, GHG Mitigation Measure, has been deleted:

#### ~~GHG Mitigation Measures~~

~~C-6 — The proposed project shall follow the guidelines and regulations outlined by AB 32 and the 2006 CAT Report Strategies.~~

Page IV.C-35, Level of Significance After Mitigation, GHG discussion has been revised:

~~With implementation of Mitigation Measure C-6 above, t~~The proposed project would be consistent with the goals of AB32 and 2006 CAT Report strategies, and therefore, cumulative impacts would be less than significant.

Page IV.C-33-34, the following modification to Mitigation Measure C-2 has been made:

C-2 The project developer shall implement fugitive dust control measures in accordance with SCAQMD Rule 403. The project developer shall include in construction contracts the control measures as may be required under Rule 403 at the time of development, including but not limited to the following

- Use watering to control dust generation during demolition of structures or break-up of pavement. The construction area and vicinity (500-foot radius) must be swept (preferably with water sweepers) and watered at least twice daily. Site wetting must occur often enough to maintain a 10 percent surface soil moisture content throughout all earth moving activities. All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
- Water active grading/excavation sites and unpaved surfaces at least three times daily.
- Site access points must be swept/washed within thirty minutes of visible dirt deposition.
- Sweep daily (preferably with water sweepers) all paved parking areas and staging areas.
- Onsite stockpiles of debris, dirt or rusty material must be covered or watered at least twice daily.
- Cover stockpiles with tarps or apply non-toxic chemical soil binders.
- All haul trucks hauling soil, sand, and other loose materials must either be covered or maintain two feet of freeboard.
- At least 80 percent of all inactive disturbed surface areas must be watered on a daily basis when there is evidence of wind drive fugitive dust.
- Install wind breaks or green screens at the windward sides of construction areas.
- Operations on any unpaved surfaces must be suspended when winds exceed 25 mph at the project site.
- Suspend excavation and grading activity when winds (instantaneous gusts) exceed 15 miles per hour over a 30-minute period or more at the project site, so as to prevent excessive amounts of dust.
- All haul trucks hauling soil, sand, and other loose materials must either be covered or maintain two feet of freeboard.
- All haul trucks must have a capacity of no less than twelve and three-quarter (12.75) cubic yards.
- All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.

- Traffic speeds on unpaved roads must be limited to 15 miles per hour.
- Provide daily clean-up of mud and dirt carried onto paved streets from the site as required.
- Install wheel washers or rumble plates for all exiting trucks, wash off the tires or tracks of all trucks and equipment leaving the site or install a crushed rock apron at the site entrance.
- All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive fugitive dust generation. Any reasonable complaints shall be rectified within 24 hours of their receipt.

#### **D. CULTURAL RESOURCES**

No corrections or additions are provided.

#### **E. GEOLOGY AND SOILS**

No corrections or additions are provided.

#### **F. HAZARDS AND HAZARDOUS MATERIALS**

No corrections or additions are provided.

#### **G. HYDROLOGY AND WATER QUALITY**

No corrections or additions are provided.

#### **H. LAND USE AND PLANNING**

Page IV.H-5 has been revised:

##### *Walkability Checklist*

The Walkability Checklist is the City Planning Department's first step in implementing walkability objectives. The Checklist is a framework to assist planning staff in assessing the pedestrian orientation of projects subject to site plan review. Walkability is an important component of urban design. It is a vital component of livable neighborhoods, smart growth, and transit oriented areas. The checklist identifies design elements that are important in creating an active and safe pedestrian environment. Where Community Plans and/or other adopted plans provide insufficient guidance to address the broader context of urban form and designing for pedestrians, this Checklist provides details, guidance, and rationale to

enhance the pedestrian perspective and meeting pedestrian’s needs. Table IV.B-1 identifies goals of the Walkability Checklist that apply to the proposed project and discusses the proposed project’s level of attainment of these goals.

**Table IV.B-1  
Walkability Checklist**

<b>Goals</b>	<b>Discussion</b>
<p><b><u>Building Orientation</u></b></p> <ul style="list-style-type: none"> <li>• <u>The primary entrance for pedestrians should be at grade level from the public way and be easily accessible from transit stops, with as direct a path as possible to the transit stop. Retail establishments should maintain at least one entrance from the public way with at least one door unlocked during business hours.</u></li> <li>• <u>The main pedestrian entrance should be configured to be fully accessible per the ADA, such that an auxiliary approach for persons with mobility limitations would not be necessary.</u></li> </ul>	<p><u>Residential pedestrian access will be provided via a residential lobby accessible on Crescent Heights Boulevard, and Wilshire Boulevard. The retail space would be located along Wilshire Boulevard to create a commercially-oriented street level presence. As both entrances are at ground level, and the upper stories of the building are accessible by elevator, the proposed project would be fully accessible per the ADA. A bus stop is located directly in front of the proposed project site and offers a clear and accessible path to the proposed project.</u></p>
<p><b><u>Building Frontage</u></b></p> <ul style="list-style-type: none"> <li>• <u>The façade should include a variety of features such as: a combination of different textures, colors and materials; distinctive architectural features; display windows; signage; setbacks and differentiated massing; rooflines; shade and shadow textures.</u></li> <li>• <u>The façade should create or reinforce an existing façade rhythm.</u></li> <li>• <u>Upper floor should be differentiated from the ground floor.</u></li> <li>• <u>There should be no blank walls. Walls should be interesting facades by incorporating a combination of elements such as: sculpted, carved or penetrated wall surface; planters; murals; mosaics; public art; awnings; lighting.</u></li> <li>• <u>The building frontage should include overhead architectural features, such as awnings, canopies, trellises or cornice treatments.</u></li> <li>• <u>At corners, the building frontage should consider building cutoffs in response to any need to accommodate pedestrians and to protect pedestrian safety, security and enjoyment.</u></li> <li>• <u>Any spaces created by setbacks, building cut-offs and/or breaks in exterior walls should be turned into active spaces, such as active plazas or courtyards. Where appropriate given the character of the street and a sidewalk that is narrower than desired, the setback should be increased to create more space for such active plazas or courtyards and/or additional pedestrian amenities or landscaping.</u></li> <li>• <u>Where there are breaks or openings in the ground floor building façade, architectural features should</u></li> </ul>	<p><u>The building façade would include a variety of features that would combine to create an interesting and aesthetically pleasing visual impact. Glass window walls, gridded exterior plaster patterning, aluminum accents, plaster balcony railings, strata walls, and metal grill work, would all contribute to the creation of façade rhythm and a varied visual impact. The upper floors of the building would be stepped and differentiated from the ground floor by differing design and materials including balconies. There will be no blank walls. The building, as designed, is modern in style and is intended to lend a complementary, yet distinct, commercial character which will be integrated into the Wilshire Boulevard street frontage. While the majority of the proposed project is residential in nature, the ground level retail stores would include features typical to retail uses such as, display windows, awnings, pedestrian level signs, and entrances, which would comprise 75 percent of the ground level building façade. The building would be placed on the front property line at the required setback. Massing of the project would be reduced by incorporating the residential portion of the project into a slender tower.</u></p>

Goals	Discussion
<p>be applied to create continuity across the break(s).</p> <ul style="list-style-type: none"> <li>• <u>The building should be placed at the front property line or at the required setback; that is, the building should not be set back further than the required setback in order to be as close as possible to the front property line and maintain a strong street wall.</u></li> <li>• <u>In non-residential uses, most (i.e., 75%) of the ground floor building façade should be devoted to pedestrian entrances, pedestrian-level display windows and/or pedestrian-level windows affording views into and out of the building interior. Display windows and other pedestrian-level windows should not be covered or otherwise blocked to prevent views during regular business hours.</u></li> </ul>	
<p><b><u>On-Site Landscaping</u></b></p> <ul style="list-style-type: none"> <li>• <u>Canopy trees (in addition to street trees) should be provided in landscaped areas. For example, a row of trees could be provided on both sides of the sidewalk.</u></li> <li>• <u>Landscaping should not impede pedestrian movement or views. For example, avoid tall shrubbery immediately adjacent to the sidewalk.</u></li> <li>• <u>Trees should be considered especially where such additional vertical elements reinforce or contribute to the street wall and a sense of enclosure.</u></li> </ul>	<p><u>As the proposed project is located in an entirely urban environment, and the building footprint would occupy the entire site, landscaping would be similar to existing landscaping: small neat lawns bordering the site with new trees and shrubbery replacing the existing trees. Canopy trees would be planted along the sidewalk on both Crescent Heights and Wilshire Boulevards.</u></p>
<p><b><u>Off-Street Parking</u></b></p> <ul style="list-style-type: none"> <li>• <u>Parking should be located at the rear of the building rather than adjoining the adjacent major street.</u></li> <li>• <u>Alleys should be used to access the parking behind the building. If no alley is available, access should be created from a side street.</u></li> <li>• <u>Vehicle access into and from the site should be accommodated with as few driveways as possible to the street; and, where available, the site plan should encourage and accommodate as much vehicle access as possible from side streets and/or alleys.</u></li> <li>• <u>The width of each driveway should meet and not exceed the standard width identified as necessary to accommodate vehicles.</u></li> <li>• <u>All surface parking adjoining the street should be screened by a durable barrier and landscaping that is tall enough to at least screen car headlights.</u></li> <li>• <u>Easily identifiable pedestrian walkways should be provided from the parking to the sidewalk and to the entrance of the building. Techniques, such as landscaped lightwells and surface treatments, could be used.</u></li> <li>• <u>All parking areas and integrated pedestrian walkways should be illuminated with adequate, uniform and glare-free lighting such that there is even light distribution and there are no harsh shadows.</u></li> <li>• <u>Driveways that have been or are to be abandoned</u></li> </ul>	<p><u>Parking would be located entirely within two and one-half subterranean levels of parking and four above grade parking levels. Vehicular access for retail customers will be located along Wilshire Boulevard. For residential tenants vehicular access will be located along both Wilshire Boulevard and Crescent Heights Boulevard. The existing driveways would be removed and the sidewalk repaired. The interior of the parking garage would not be visible, and no surface parking would be adjoining the street. Driveways would meet all applicable standards necessary to accommodate vehicles. Parking areas and pedestrian walkways from the parking areas to the building entrance will be adequately illuminated for safety and security reasons.</u></p>

Goals	Discussion
<p>should be reconstructed as sidewalks.</p> <ul style="list-style-type: none"> <li>• <u>Sub-standard driveways should be reconstructed to meet current ADA requirements.</u></li> </ul>	
<p><b><u>Building Signage</u></b></p> <ul style="list-style-type: none"> <li>• <u>The building façade should include pedestrian-scale signage, i.e., as a height and of a size that is visible to pedestrians, assists in identifying the structure and use, and facilitates access to the entrance.</u></li> <li>• <u>Pedestrian level lighting should be provided on building facades and around the site along pathways.</u></li> </ul>	<p><u>The proposed project would include pedestrian-scale tenant signage at a pedestrian level and would be included along the retail portion of the project. Lighting would also be provided on the building façade at the pedestrian level, and around the site pathways.</u></p>
<p><b><u>Sidewalks</u></b></p> <ul style="list-style-type: none"> <li>• <u>The sidewalk should be continuous and straight or relatively straight.</u></li> <li>• <u>The landscape/furniture zone should maximize shade-producing street trees, including interspersing them with existing or proposed palms.</u></li> <li>• <u>Shade trees should be planted as close to one another as possible.</u></li> <li>• <u>The landscape/furniture zone should include features that create a buffer between the sidewalk and the roadway, especially where vehicular movement is allowed in the curb lane, which separates pedestrians from moving vehicles. Such features include bollards, planters and parkways.</u></li> <li>• <u>The landscape/furniture zone should include street furniture.</u></li> <li>• <u>The landscape/furniture zone should include pedestrian-level lighting. For example, such lighting could be provided with bollards that are equipped with a low level light source or mounted on decorative poles.</u></li> </ul>	<p><u>The proposed project would not dramatically change the sidewalks. The sidewalk would continue the same path as the existing sidewalk and be continuous and straight and is proposed to be the City standard nine feet wide. Trees would be added along the sidewalk similar to existing conditions and would offer shade and a visual buffer between the street and the proposed project. The project site would be illuminated with lighting from within the commercial portions of the proposed project, signage lighting and security lighting. No street furniture is proposed.</u></p>
<p><b><u>Utilities</u></b></p> <ul style="list-style-type: none"> <li>• <u>Utilities should be placed underground.</u></li> </ul>	<p><u>Utilities would be placed underground.</u></p>

As discussed above, the proposed project would be consistent with the Walkability Checklist as it applies to the proposed project. The pedestrian environment is an important asset along Wilshire Boulevard and would be enhanced by the proposed project. The project site in its current state contains no pedestrian amenities as it is a single use bank and parking lot. Therefore, implementation of the proposed project would improve the pedestrian environment by providing an attractive structure that contains ground floor retail uses available to pedestrians. Therefore, the proposed project would have a positive impact.

**I. NOISE**

Page IV.I-17 of the Draft EIR is revised as follows:

However, the construction activities and their associated vibration levels would vary according to phase of construction and would be limited to daytime hours between 7:00 AM through ~~6~~9:00 PM Monday

through Friday and between 8:00 AM to 6:00 PM Saturdays in accordance with Section 41.40 of the LAMC. In addition, even though construction activities would be limited to these hours, implementation of Mitigation Measure I-1 below would further reduce impacts associated with construction vibration.

Page IV.I-22 of the Draft EIR is revised as follows:

I-1 The project shall ~~comply with the City of Los Angeles Noise Ordinance No. 41.40 which restricts~~ construction and demolition activities to the hours of 7:00 a.m. to ~~6~~9:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday.

The following mitigation measure is added to page IV.I-22 of the Draft and reads:

I-8 During construction, an approximate 15-foot, temporary plywood barrier shall be erected along the northern boundary of the project site to reduce construction noise impacts on nearby sensitive receptors. The plywood barrier shall be erected prior to demolition activities and remain in place until exterior construction has been completed.

## **J. POPULATION AND HOUSING**

No corrections or additions are provided.

## **K. PUBLIC SERVICES**

No corrections or additions are provided.

### **1. FIRE PROTECTION**

No corrections or additions are provided.

### **2. POLICE PROTECTION**

No corrections or additions are provided.

### **3. SCHOOLS**

No corrections or additions are provided.

### **4. PARKS**

No corrections or additions are provided.

### **5. LIBRARIES**

No corrections or additions are provided.

**L. TRANSPORTATION/TRAFFIC**

No corrections or additions are provided.

**M. UTILITIES**

No corrections or additions are provided.

**1. WASTEWATER**

Page IV.M-1 of the Draft EIR is revised as follows:

The City of Los Angeles Department of Public Works Bureau of Sanitation (LABS) provides sewer conveyance infrastructure and wastewater treatment services to the project area. The existing sewer infrastructure in the vicinity of the ~~lines nearest the~~ project site includes the existing 8-inch line in Orange Street and an existing 8-inch pipe on Wilshire Boulevard. The sewage from the existing 8-inch lines in Orange Street and Wilshire Boulevard feeds into ~~continues into Sweetzer Avenue, then to a~~ 33-inch line in Schumacher Drive, before discharging to a 42-inch line in La Cienega Boulevard.

The current flow level (d/D) in the 8-inch line in Orange Street ~~and 33-inch lines~~ cannot be determined at this time as gauging is needed for these lines. Based on the LABS available gauging information, the current flow level (d/D) in the 8-inch line on Wilshire Boulevard is approximately 19% full, the 33-inch line on Schumacher Drive is approximately 57% full, and the 42-inch line on La Cienega Boulevard is approximately 34% full. The design capacities at d/D of 50% are as follows:

- 8-inch line on Orange Street is 280,862 gallons per day,
- 8-inch line on Wilshire Boulevard is ~~229,000~~362,591 gallons per day,
- 33-inch line on Schumacher Drive is ~~12.089~~12.089 million gallons per day, and
- 42-inch line on La Cienega Boulevard is ~~17.073~~17.073 million gallons per day.<sup>1</sup>

**2. WATER**

No corrections or additions are provided.

**3. SOLID WASTE**

No corrections or additions are provided.

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<sup>1</sup> *Written correspondence with Brent Lorscheider, Acting Division Manager, City of Los Angeles Department of Public Works, Bureau of Sanitation, ~~February 21, 2008~~ September 3, 2009.*

**V. GENERAL IMPACT CATEGORIES**

**VI. ALTERNATIVES TO THE PROPOSED PROJECT**

**VII. PREPARERS OF THE EIR AND PERSONS CONSULTED**

**VIII. LIST OF ACRONYMS AND ABBREVIATIONS**

No corrections or additions are provided.

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## IV. MITIGATION MONITORING PROGRAM

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The Mitigation Monitoring Plan (MMP) has been prepared in accordance with Public Resources Code Section 21081.6, which requires a Lead or Responsible Agency that approves or carries out a project where an EIR has identified significant environmental effects to adopt a “reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment.” The City of Los Angeles is the Lead Agency for the proposed project.

The MMP is designed to monitor implementation of all feasible mitigation measures as identified in the Draft and Final EIRs for the proposed project. Mitigation measures are indicated below and are numbered consistent with the relevant section numbering provided in the Draft EIR. Each mitigation measure is listed and categorized by topic with an accompanying discussion of the following:

- The phase of the project during which the mitigation measure should be monitored (i.e., prior to issuance of building permit, pre-construction, construction, or occupancy);
- The enforcement agency (i.e., the agency with the authority to enforce the mitigation measure); and
- The monitoring agency (i.e., the agency which monitors compliance and implementation of the required mitigation measure).

The project applicant shall be obligated to provide certification prior to the issuance of site or building plans that compliance with the required mitigation measures has been achieved. All departments listed below are within the City of Los Angeles unless otherwise noted. The entity responsible for the implementation of all mitigation measures shall be the project applicant unless otherwise noted.

### AIR QUALITY

**C-1** The project developer shall implement the following measures to reduce the emissions of pollutants generated by heavy-duty diesel-powered equipment operating at the project site throughout the project construction phases. The project developer shall include in construction contracts the control measures as required under Rule 403, at the time of development, including the following:

- Keep all construction equipment in proper tune in accordance with manufacturer’s specifications.
- Use late model heavy-duty diesel-powered equipment at the project site to the extent that it is readily available in the South Coast Air Basin (meaning that it does not have to be imported from another air basin and that the procurement of the equipment would not cause a delay in construction activities of more

than two weeks).

- Use low-emission diesel fuel for all heavy-duty diesel-powered equipment operating and refueling at the project site to the extent that it is readily available and cost effective in the South Coast Air Basin (meaning that it does not have to be imported from another air basin, that the procurement of the equipment would not cause a delay in construction activities of more than two weeks, that the cost of the equipment use is not more than 20 percent greater than the cost of standard equipment. (This measure does not apply to diesel-powered trucks traveling to and from the site.)
- Utilize alternative fuel construction equipment (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent that the equipment is readily available and cost effective in the South Coast Air Basin (meaning that it does not have to be imported from another air basin, that the procurement of the equipment would not cause a delay in construction activities of more than two weeks, that the cost of the equipment use is not more than 20 percent greater than the cost of standard equipment.
- Limit truck and equipment idling time to five minutes or less.
- Rely on the electricity infrastructure surrounding the construction sites rather than electrical generators powered by internal combustion engines to the extent feasible.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.

**Monitoring Phase:** Construction

**Enforcement Agency:** South Coast Air Quality Management District/Department of Building and Safety

**Monitoring Agency:** South Coast Air Quality Management District/Department of Building and Safety

## C-2

The project developer shall implement fugitive dust control measures in accordance with SCAQMD Rule 403. The project developer shall include in construction contracts the control measures as may be required under Rule 403 at the time of development, including but not limited to the following

- Use watering to control dust generation during demolition of structures or break-up of pavement. The construction area and vicinity (500-foot radius)

must be swept (preferably with water sweepers) and watered at least twice daily. Site wetting must occur often enough to maintain a 10 percent surface soil moisture content throughout all earth moving activities. All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.

- Water active grading/excavation sites and unpaved surfaces at least three times daily.
- Site access points must be swept/washed within thirty minutes of visible dirt deposition.
- Sweep daily (preferably with water sweepers) all paved parking areas and staging areas.
- Onsite stockpiles of debris, dirt or rusty material must be covered or watered at least twice daily.
- Cover stockpiles with tarps or apply non-toxic chemical soil binders.
- All haul trucks hauling soil, sand, and other loose materials must either be covered or maintain two feet of freeboard.
- At least 80 percent of all inactive disturbed surface areas must be watered on a daily basis when there is evidence of wind drive fugitive dust.
- Install wind breaks or green screens at the windward sides of construction areas.
- Operations on any unpaved surfaces must be suspended when winds exceed 25 mph at the project site.
- Suspend excavation and grading activity when winds (instantaneous gusts) exceed 15 miles per hour over a 30-minute period or more at the project site, so as to prevent excessive amounts of dust.
- All haul trucks must have a capacity of no less than twelve and three-quarter (12.75) cubic yards.
- All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.

- Traffic speeds on unpaved roads must be limited to 15 miles per hour.
- Provide daily clean-up of mud and dirt carried onto paved streets from the site as required.
- Install wheel washers or rumble plates for all exiting trucks, wash off the tires or tracks of all trucks and equipment leaving the site or install a crushed rock apron at the site entrance.
- All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive fugitive dust generation. Any reasonable complaints shall be rectified within 24 hours of their receipt.

**Monitoring Phase:** Construction

**Enforcement Agency:** South Coast Air Quality Management District/Department of Building and Safety

**Monitoring Agency:** South Coast Air Quality Management District/Department of Building and Safety

**C-3** For the residential development, in accordance with LEED New Construction Energy and Atmosphere Credit 1, the project shall be constructed with materials that reduce thermal loss and energy demand that exceeds Title 24 regulations by 14% or greater, or LEED Homes by 10% or greater.

**Monitoring Phase:** Prior to issuance of building permits

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**C-4** For the residential development, in accordance with LEED New Construction Indoor Environmental Quality Credit 6.1 or LEED Homes (Multi-family for California) Energy and Atmosphere Credit 8.2, the Applicant shall install lighting system controllability as well as energy-efficient lighting fixtures.

**Monitoring Phase:** Prior to issuance of building permits

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**C-5** The Applicant shall provide informational packets to new residents within the development locating nearby public transportation options.

**Monitoring Phase:** Operation

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

## CULTURAL RESOURCES

**D-1** If any archaeological materials are encountered during the course of the project development, construction shall be halted in the area of resource discovery. The services of an archaeologist shall be secured by contacting the Center for Public Archaeology - Cal State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist to assess the resources and evaluate the impact. Copies of the archaeological survey, study or report shall be submitted to the UCLA Archaeological Information Center.

**Monitoring Phase:** Grading/excavation

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**D-2** If any paleontological materials are encountered during the course of the project development, construction shall be halted in the area of resource discovery. The services of a paleontologist shall be secured by contacting the Center for Public Paleontology - USC, UCLA, Cal State Los Angeles, Cal State Long Beach, or the County Natural History Museum to assess the resources and evaluate the impact. Copies of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum.

**Monitoring Phase:** Grading/excavation

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

- D-3** If human remains are discovered at the project site during construction, work at the specific construction site at which the remains have been uncovered shall be suspended, and the City of L.A. Public Works Department and County Coroner shall be immediately notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains.

**Monitoring Phase:** Grading/excavation

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

## GEOLOGY AND SOILS

- E-1** The project shall comply with the recommendations listed on pages 8 through 17 in the Preliminary Geotechnical Exploration Report, Crescent Heights Project, Proposed Multi-level Development, 6245-6233 Wilshire Boulevard & 652 South Crescent Heights Boulevard, Los Angeles, California, prepared by Professional Service Industries, Inc., dated August 29, 2007.

**Monitoring Phase:** Grading, Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

- E-2** Although no groundwater was encountered at a maximum depth, the acknowledgement of historically high groundwater may result in a need for construction dewatering, Los Angeles Regional Water Quality Control Board permitting, and waterproofing in subterranean parking levels.

**Monitoring Phase:** During grading and construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

## HAZARDS AND HAZARDOUS MATERIALS

- F-1** Prior to the issuance of the demolition/renovation permits, the applicant shall provide a

letter to the Department of Building and Safety from a qualified asbestos abatement consultant that no ACMs are present in the buildings. If ACMs are found to be present, they shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403, as well as other state and federal regulations. Specific requirements of Rule 1403 include:

- Implementation of a thorough survey of the affected facility prior to issuance of permits for any demolition or renovation activity, including inspection, identification, and quantification of all friable and certain non-friable asbestos-containing materials.
- Surveys which include collection and analyses of representative asbestos building material samples, and quantification of these materials for asbestos abatement purposes prior to or during demolition/renovation.
- Notification of the SCAQMD of the intent to demolish or renovate any facility at least ten days prior to commencing with the activity.
- Removal of all asbestos-containing materials prior to any demolition or renovation activity that would break up, dislodge, or similarly disturb the material.
- Use of legally required procedures when removing asbestos-containing materials.
- Placement of all collected asbestos-containing materials in leak-tight containers or wrapping.
- Disposal of asbestos-containing materials as required by applicable regulations.

**Monitoring Phase:** Prior to issuance of demolition permits

**Enforcement Agency:** Department of Building and Safety/South Coast Air Quality Management District

**Monitoring Agency:** Department of Building and Safety

**F-2** Prior to issuance of permits for any demolition/renovation activity involving a particular structure, a lead-based paint assessment of each existing apartment structure shall be conducted. Lead-based paint found in any buildings shall be removed and disposed of as a hazardous waste in accordance with all applicable regulations. Such regulations that would be followed during demolition include Construction Safety Orders 1532.1 (pertaining to lead) from Title 8 of the California Code of Regulations, and lead exposure

guidelines provided by the U.S. Department of Housing and Urban Development (HUD).

**Monitoring Phase:** Prior to issuance of demolition permits

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**F-3** The project shall implement all appropriate mitigation measures prescribed in the City of Los Angeles Methane Hazard and Methane Buffer Zone level 5 design criteria as found on pages 16 to 25 of the report. These mitigation measures would include, but not be limited to, passive and active mechanical venting systems, methane gas detection alarms, and impermeable membranes beneath the building.

**Monitoring Phase:** Prior to issuance of building permits

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

## HYDROLOGY AND WATER QUALITY

**G-1** All waste shall be disposed of properly according to federal, state, and local laws. Toxic wastes shall be discarded at a licensed regulated disposal site.

**Monitoring Phase:** Construction

**Enforcement Agency:** Regional Water Quality Control Board, Los Angeles Region / Bureau of Sanitation

**Monitoring Agency:** Department of Water and Power / Bureau of Sanitation

**G-2** Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.

**Monitoring Phase:** Construction

**Enforcement Agency:** Department of Building and Safety/Bureau of Sanitation, Watershed Division

**Monitoring Agency:** Department of Building and Safety

- G-3** Do not hose down pavement at material spills. Dry cleanup methods shall be used whenever possible.
- Monitoring Phase:** Construction
- Enforcement Agency:** Department of Building and Safety/Bureau of Sanitation, Watershed Division
- Monitoring Agency:** Department of Building and Safety
- G-4** Dumpsters shall be covered and maintained. Place uncovered dumpsters under a roof or cover with tarps or plastic sheeting.
- Monitoring Phase:** Construction
- Enforcement Agency:** Department of Building and Safety/Bureau of Sanitation, Watershed Division
- Monitoring Agency:** Department of Building and Safety
- G-5** Where truck traffic is frequent, gravel approaches shall be used to reduce soil compaction and limit the tracking of sediment into streets.
- Monitoring Phase:** Construction
- Enforcement Agency:** Department of Building and Safety/Bureau of Sanitation, Watershed Division
- Monitoring Agency:** Department of Building and Safety
- G-6** All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop cloths shall be used to catch drips and spills.
- Monitoring Phase:** Construction
- Enforcement Agency:** Department of Building and Safety/Bureau of Sanitation, Watershed Division
- Monitoring Agency:** Department of Building and Safety

**NOISE**

**I-1** The project shall restrict construction and demolition activities to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday.

**Monitoring Phase:** Pre-Construction, Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**I-2** Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

**Monitoring Phase:** Pre-Construction, Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**I-3** The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized to the extent feasible. Examples include the use of drills, jackhammers, and pile drivers.

**Monitoring Phase:** Pre-Construction, Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**I-4** The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

**Monitoring Phase:** Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**I-5** Noise construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum

extent possible.

**Monitoring Phase:** Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**I-6** Equipment warm-up areas, water tanks, and equipment storage areas shall be located as far as possible from the surrounding residential uses.

**Monitoring Phase:** Pre-Construction, Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**I-7** Flexible sound control curtains shall be placed around drilling apparatuses and drill rigs used within the project site.

**Monitoring Phase:** Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**I-8** During construction, an approximate 15-foot, temporary plywood barrier shall be erected along the northern boundary of the project site to reduce construction noise impacts on nearby sensitive receptors. The plywood barrier shall be erected prior to demolition activities and remain in place until exterior construction has been completed.

**Monitoring Phase:** Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

## **PUBLIC SERVICES**

### **Fire**

**K.1-1** Prior to recordation of a final map or the approval of a building permit, the applicant

shall submit the plot plan for review and approval by the Fire Department.

**Monitoring Phase:** Prior to issuance of building permit

**Enforcement Agency:** Fire Department/Department of Building and Safety

**Monitoring Agency:** Fire Department

**K.1-2** No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant.

**Monitoring Phase:** Prior to issuance of building/demolition permits

**Enforcement Agency:** Fire Department/Department of Building and Safety

**Monitoring Agency:** Fire Department

**K.1-3** Access for Fire Department apparatus and personnel to and into all structures, including the parking facility, shall be provided.

**Monitoring Phase:** Prior to issuance of building/demolition permits

**Enforcement Agency:** Fire Department/Department of Building and Safety

**Monitoring Agency:** Fire Department

**K.1-4** In accordance with LAMC Section 57.09.07, the project applicant shall equip the proposed structure with automatic sprinkler systems.

**Monitoring Phase:** Prior to issuance of a building permit

**Enforcement Agency:** Fire Department/Department of Building and Safety

**Monitoring Agency:** Fire Department

**K.1-5** The proposed project shall comply with all applicable State and local codes and ordinances, and guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan for the City of Los Angeles C.P.C. 19708.

**Monitoring Phase:** Prior to issuance of building permits

**Enforcement Agency:** Fire Department/Department of Building and Safety

**Monitoring Agency:** Fire Department

## Police

**K.2-1** During construction activities, the project developer shall ensure that all onsite areas of active development, material and equipment storage, and vehicle staging, that are adjacent to existing public roadways, be secured to prevent trespass.

**Monitoring Phase:** Construction

**Enforcement Agency:** Police Department / Department of Building and Safety

**Monitoring Agency:** Police Department

**K.2-2** Prior to site plan approval, the building and layout design of the proposed project shall include crime prevention features, such as nighttime security lighting, building security systems, and secure parking facilities.

**Monitoring Phase:** Prior to approval of site plan

**Enforcement Agency:** Police Department/Department of Building and Safety

**Monitoring Agency:** Police Department

**K.2-3** Prior to the recordation of a final map or the approval of a building permit, the project developer shall submit a plot plan for the proposed development to the LAPD's Crime Prevention Section for review and comment. Security features subsequently recommended by the LAPD shall be implemented, to the extent feasible.

**Monitoring Phase:** Prior to issuance of building permit

**Enforcement Agency:** Police Department/Department of Building and Safety

**Monitoring Agency:** Police Department

## Schools

**K.3-1** The applicant shall pay all applicable mandatory school impact fees to LAUSD.

**Monitoring Phase:** Prior to certificate of occupancy

**Enforcement Agency:** Los Angeles Unified School District / Department of

## Building and Safety

**Monitoring Agency:** Los Angeles Unified School District

**Parks**

**K.4-1** The applicant shall pay the requisite fees to the Department of Building and Safety in accordance to the Dwelling Unit Construction Tax required by the Los Angeles Municipal Code Section 21.10.3(b).

**Monitoring Phase:** Prior to certificate of occupancy

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**K.4-2** The applicant shall fulfill the obligations of the Quimby Act through parkland dedication or payment of fees in lieu of parkland dedication.

**Monitoring Phase:** Prior to certificate of occupancy

**Enforcement Agency:** Department of Building and Safety / Department of Recreation and Parks

**Monitoring Agency:** Department of Recreation and Parks

**Libraries**

**K.5-1** The Los Angeles Public Library recommends a mitigation fee of \$200 per capita based upon the projected population of the development. The funds will be used for staff, books, computers, and other library materials. It is recommended that mitigation fees be paid by the developer.

**Monitoring Phase:** Prior to certificate of occupancy

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Los Angeles Public Library

**TRANSPORTATION/TRAFFIC**

- L-1** The project applicant shall contribute to the installation of southbound left-turn phasing at this intersection (protected phase during the AM and PM peak hours, permissive during off-peak periods) to provide enhanced signal operations and smoother traffic flow at this location.

**Monitoring Phase:** Pre-Construction, Construction

**Enforcement Agency:** Department of Building and Safety / Los Angeles  
Department of Transportation

**Monitoring Agency:** Los Angeles Department of Transportation

- L-2** The project applicant shall work with LADOT to develop a TDM plan that includes trip reduction goals aimed at reducing the project's traffic impacts. A preliminary TDM plan shall be prepared and provided for LADOT review prior to issuance of the first building permit for the project, and a final TDM program shall be approved by LADOT prior to issuance of any temporary or final certificate of occupancy for the project.

**Monitoring Phase:** Prior to issuance of building permit

**Enforcement Agency:** Department of Building and Safety / Los Angeles  
Department of Transportation

**Monitoring Agency:** Los Angeles Department of Transportation

**UTILITIES****Water Supply**

- M.2-1** The project developer shall ensure that the landscape irrigation system be designed, installed, and tested to provide uniform irrigation coverage. Sprinkler head patterns shall be adjusted to minimize over spray onto walkways and streets.

**Monitoring Phase:** Prior to issuance of building permits

**Enforcement Agency:** Department of Water and Power/Department of Building  
and Safety

**Monitoring Agency:** Department of Water and Power/Department of Building  
and Safety

**M.2-2** The project developer shall install either a “smart sprinkler” system to provide irrigation for the landscaped areas or, at a minimum, set automatic irrigation timers to water landscaping during early morning or late evening hours to reduce water losses from evaporation. Irrigation run times for all zones shall be adjusted seasonally, reducing water times and frequency in the cooler months (fall, winter, spring). Sprinkler run times shall be adjusted to avoid water runoff, especially when irrigating sloped property.

**Monitoring Phase:** Prior to issuance of building permits

**Enforcement Agency:** Department of Water and Power/ Department of Building and Safety

**Monitoring Agency:** Department of Water and Power/ Department of Building and Safety

**M.2-3** The project developer shall select and use drought tolerant, low water consuming plant varieties to reduce irrigation water consumption.

**Monitoring Phase:** Prior to issuance of certificate of occupancy

**Enforcement Agency:** Department of Water and Power/Department of Building and Safety

**Monitoring Agency:** Department of Water and Power/Department of Building and Safety

**M.2-4** The project developer shall install ultra-low flush water toilets and water saving showerheads in new construction. Low-flow faucet aerators shall be installed on all sink faucets.

**Monitoring Phase:** Prior to issuance of building permits

**Enforcement Agency:** Department of Water and Power/Department of Building and Safety

**Monitoring Agency:** Department of Water and Power/Department of Building and Safety

**M.2-5** The availability of recycled water shall be investigated as a source to irrigate large landscaped areas.

**Monitoring Phase:** Prior to issuance of building permits

**Enforcement Agency:** Department of Water and Power/Department of Building and Safety

**Monitoring Agency:** Department of Water and Power/Department of Building and Safety

**M.2-6** Significant opportunities for water savings exist in air conditioning systems that utilize evaporative cooling (i.e., employ cooling towers). The applicant shall contact LADWP for guidance and recommendations regarding appropriate water savings solutions/measures for the project's air conditioning system.

**Monitoring Phase:** Prior to issuance of building permits

**Enforcement Agency:** Department of Water and Power/Department of Building and Safety

**Monitoring Agency:** Department of Water and Power/Department of Building and Safety

## **Solid Waste**

**M.3-1** The construction contractor shall only contract for waste disposal services with a company that recycles construction related wastes.

**Monitoring Phase:** Pre-Construction, Construction

**Enforcement Agency:** Bureau of Sanitation/Department of Building and Safety

**Monitoring Agency:** Bureau of Sanitation/Department of Building and Safety

**M.3-2** The project applicant shall separate onsite drywall materials from the construction trash debris and shall contract with a waste disposal company to sort and recycle remaining materials.

**Monitoring Phase:** Pre-Construction, Construction

**Enforcement Agency:** Bureau of Sanitation/Department of Building and Safety

**Monitoring Agency:** Bureau of Sanitation/Department of Building and Safety

**M.3-3** Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. The proposed project shall comply with all applicable adopted recycling and waste diversion policies of the City of Los Angeles.

Angeles.

**Monitoring Phase:** Prior to issuance of certificate of occupancy

**Enforcement Agency:** Bureau of Sanitation/Department of Building and Safety

**Monitoring Agency:** Bureau of Sanitation/Department of Building and Safety



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



ARNOLD SCHWARZENEGGER  
GOVERNOR

CYNTHIA BRYANT  
DIRECTOR

September 29, 2009

RECEIVED  
CITY OF LOS ANGELES

OCT 06 2009

ENVIRONMENTAL  
UNIT

Jimmy Liao  
City of Los Angeles  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Subject: Wilshire Crescent Heights  
SCH#: 2008051017

Dear Jimmy Liao:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on September 28, 2009, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

1-1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

for: Scott Morgan  
Acting Director, State Clearinghouse

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

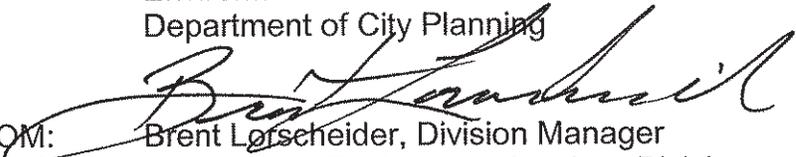
DATE: September 3, 2009

**RECEIVED**  
CITY OF LOS ANGELES

TO: Jimmy Liao, City Planner  
Environmental Review Section  
Department of City Planning

SEP 09 2009

ENVIRONMENTAL  
UNIT

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

SUBJECT: **Wilshire Crescent Heights – Draft EIR**

This is in response to your August 13, 2009 letter requesting a review of your proposed project. The Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

2-1

**WASTEWATER REQUIREMENT**

The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvement projects needed to provide future capacity as the City grows and develops.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
<b><i>Existing</i></b>			
Bank	80 GPD/1000 SQ.FT	7,117 SQ.FT	(569)
<b><i>Proposed</i></b>			
Residential: 2-BR	160 GPD/DU	158 DU	25,280
Retail	80 GPD/1000 SQ.FT	1,080 SQ.FT	86
Restaurant	300 GPD/1000 SQ.FT	1,570 SQ.FT	471
Commercial	80 GPD/1000 SQ.FT	4,200 SQ.FT	336
Townhouse: 3-BR	230 GPD/DU	4 DU	920
<b>Total</b>			<b>26,524</b>

2-2

## SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes the existing 8-inch line on Orange St and an existing 8-inch line on Wilshire Blvd. The sewage from the existing 8-inch lines on Orange St and Wilshire Blvd feeds into a 33-inch line on Schumacher Dr. Sewage before discharging into the 42-inch line on La Cienega Blvd. The current flow level (d/D) in the 8-inch line on Orange St cannot be determined at this time as gauging is needed.

Based on our existing gauging information, the current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	Orange St	*	280,862 GPD
8	Wilshire Blvd	19	362,591 GPD
33	Schumacher Dr	57	12.09 MGD
42	La Cienega Blvd	34	17.34 MGD

\* No gauging available

The estimated flow that would be generated from your proposed project exceeds 20,000 GPD and therefore may have a significant impact on the sewer system capacity. Thus, detailed gauging is necessary to determine whether the sewer system is capable of safely accommodating the total flow for your proposed project. We have initiated a work order to gauge the designated critical locations in the project area. This process usually takes approximately three (3) to four (4) weeks. A detailed evaluation and response will be provided to you within one (1) to two (2) weeks upon receipt of gauging data. If this schedule is not acceptable, please call us to discuss options.

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

## STORMWATER REQUIREMENTS

The Bureau of Sanitation, Watershed Protection Division is charged with enforcement of the provisions of the National Pollutant Discharge Elimination System (NPDES) permit.

## SUSMP AND STORM WATER INFILTRATION

The proposed project is subjected to Standard Urban Stormwater Mitigation Plan (SUSMP) regulations. The proposed project is required to incorporate measures to mitigate the impact of stormwater runoff as outlined in the guidance manuals titled "*Development Best Management Practices Handbook – Part B: Planning Activities*". In addition the "*SUSMP Infiltration Requirements and Guidelines*" prioritizes the use of infiltration and bio-filtration systems as the preferred methods to comply with SUSMP requirements. These documents

can be found at: [www.lastormwater.org/Siteorg/businesses/susmp/susmpintro.htm](http://www.lastormwater.org/Siteorg/businesses/susmp/susmpintro.htm). It is advised that input regarding SUSMP requirements be received in the early phases of the project from SUSMP review staff.

2-4

### GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The proposed project includes public right-of-way improvements and presents an opportunity to include Green Street elements as part of the project. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways. For more information regarding implementation of Green Street elements, please call Wing Tam at (213) 485-3985.

2-5

### WET WEATHER EROSION CONTROL

A Wet Weather Erosion Control Plan is required for construction during the rainy season (between October 1 and April 15 per Los Angeles Building Code, Sec. 7002). For more information, please see attached Wet Weather Erosion Control Guidelines.

2-6

### STORM WATER POLLUTION PREVENTION PLAN

A Storm Water Pollution Prevention Plan (SWPPP) is required for land disturbance activities over one acre. The SWPPP must be maintained on-site during the duration of construction.

2-7

WPD staff is available at your request to provide guidance on stormwater issues. Should you have any questions, please contact Meher Irani of my staff at (213) 485-0584.

### SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that apply to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact Special Projects Division.

2-8

Special Projects staff is available at your request to provide guidance on solid resource issues. Should you have any questions, please contact Daniel Hackney at (213)485-3684.

attachments:  
Wet Weather Erosion Control

c: Meher Irani, BOS  
Daniel Hackney, BOS  
Rowena Lau, BOS



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CITY OF LOS ANGELES

SEP 24 2009

ENVIRONMENTAL  
UNIT

September 18, 2009

Jimmy Liao, City Planner  
EIR Unit  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, California 90012

RE: Wilshire Crescent Heights Project DEIR  
ENV-2008-0729-EIR

Dear Mr. Liao:

I would like to thank you for providing the opportunity to the City of Beverly Hills to comment on the Draft Environmental Impact Report prepared for the Wilshire Crescent Heights Project. Beverly Hills is interested in this project and would appreciate continuing to receive public notices on the Wilshire Crescent Heights Project as it proceeds through the environmental assessment and public hearing processes.

3-1

Traffic issues are an ongoing concern in our community. While the Draft EIR concludes that the project's impacts to the Wilshire/La Cienega intersection, one of the Congestion Management Plan regional intersections, are not expected to be significant, our City Traffic Engineer has asked that the intersection be evaluated using an ICU analysis. Our previous traffic analyses of the intersection indicate that the intersection is expected to be operating at LOS F (future conditions). As such, despite the LA County CMP guidelines, it is possible that the intersection could be impacted significantly with less than 50 trips. I've included worksheets from our 8600 Wilshire EIR.

3-2

Our Traffic Engineer has also asked for greater explanation and justification of the use of high pass-by trip reductions and confirmation that these reductions are approved by the City of Los Angeles.

3-3

Jimmy Liao, City Planner  
Wilshire Crescent Heights Project DEIR/ENV-2008-0729-EIR  
September 18, 2009  
Page 2 of 3

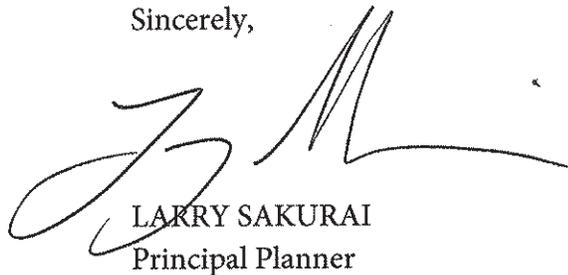
We ask that if the project is approved, heavy haul routing be prohibited from utilizing Beverly Hills streets and intersections, particularly the intersection of Wilshire Boulevard and La Cienega Boulevard, as a condition of approval.

3-3

Again, I thank you for your involvement of the City of Beverly Hills on this project. I look forward to working with you through this process.

3-4

Sincerely,



LARRY SAKURAI  
Principal Planner

cc: Aaron Kunz, Deputy Director of Transportation  
Jonathan Lait, AICP, City Planner  
Susan Healy Keene, AICP, Director of Community Development  
Mahdi Aluzri, AICP, Assistant City Manager

8600 Wilshire Project EIR LOS Worksheets

Level Of Service Computation Report  
 ICU 1 (Loss as Cycle Length %) Method (Future Volume Alternative)  
 Intersection #4 La Cienega Bl & Wilshire Bl  
 Cycle (sec): 100 Critical Vol./Cap. (X): 1.169  
 Loss Time (sec): 10 (Y+R = 4 sec) Average Delay (sec/veh): xxxxxx  
 Optimal Cycle: 180 Level Of Service: F  
 Street Name: La Cienega Bl Wilshire Bl  
 Approach: North Bound South Bound East Bound West Bound  
 Movement: L - T - R L - T - R L - T - R L - T - R  
 Control: Prot+Permit Prot+Permit Prot+Permit Prot+Permit  
 Rights: Include Include Include Include  
 Min. Green: 0 0 0 0  
 Lanes: 1 0 2 1 0 1 0 2 1 0 1 0 2 1 0  
 Volume Module:  
 Base Vol: 180 1479 175 155 1527 140 214 2129 198 184 1579 69  
 Growth Adj: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 Initial Bse: 180 1479 175 155 1527 140 214 2129 198 184 1579 69  
 Added Vol: 1 0 0 0 0 0 7 17 31 3 0 12 0  
 PasserByVol: 0 0 0 0 0 0 0 0 0 0 0 0  
 Initial Fut: 181 1479 175 155 1527 147 231 2160 201 184 1591 69  
 User Adj: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 PHF Adj: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 PHF Volume: 181 1479 175 155 1527 147 231 2160 201 184 1591 69  
 Reduct Vol: 0 0 0 0 0 0 0 0 0 0 0 0  
 Reduced Vol: 181 1479 175 155 1527 147 231 2160 201 184 1591 69  
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 MFL Adj: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 Final Vol.: 181 1479 175 155 1527 147 231 2160 201 184 1591 69  
 Saturation Flow Module:  
 Sat/Lane: 1600 1600 1600 1600 1600 1600 1600 1600 1600 1600 1600 1600  
 Adjustment: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 Lanes: 1.00 2.68 0.32 1.00 2.74 0.26 1.00 2.74 0.26 1.00 2.88 0.12  
 Final Sat.: 1600 4292 508 1600 4378 422 1600 4391 409 1600 4600 200  
 Capacity Analysis Module:  
 Vol/Sat: 0.11 0.34 0.34 0.10 0.35 0.35 0.14 0.49 0.49 0.12 0.35 0.35  
 Crit Moves: \*\*\*\*  
 \*\*\*\*\*

Level Of Service Computation Report  
 ICU 1 (Loss as Cycle Length %) Method (Future Volume Alternative)  
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 PHF Adj: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
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 Final Vol.: 181 1479 175 155 1527 147 231 2160 201 184 1591 69  
 Saturation Flow Module:  
 Sat/Lane: 1600 1600 1600 1600 1600 1600 1600 1600 1600 1600 1600 1600  
 Adjustment: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 Lanes: 1.00 2.68 0.32 1.00 2.74 0.26 1.00 2.74 0.26 1.00 2.88 0.12  
 Final Sat.: 1600 4292 508 1600 4378 422 1600 4391 409 1600 4600 200  
 Capacity Analysis Module:  
 Vol/Sat: 0.11 0.34 0.34 0.10 0.35 0.35 0.14 0.49 0.49 0.12 0.35 0.35  
 Crit Moves: \*\*\*\*  
 \*\*\*\*\*



# Metro

September 24, 2009

Jimmy Liao  
Environmental Review Section  
Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

SEP 29 2009

ENVIRONMENTAL  
UNIT

Dear Mr. Liao,

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

4-1

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

4-2

1. Current bus service: Wilshire Boulevard currently has very high levels of bus transit service and ridership with various bus lines that travel by and stop at or near the proposed project site. Please be advised that Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines. Metro should also be contacted if any changes to existing stops and zones are anticipated either during or after construction. Other Municipal Bus Service Operators may also be impacted and therefore should be included in the FEIR and included in construction outreach efforts.

4-3

2. Wilshire Bus Lane Project: Metro, in partnership with the City of Los Angeles, is currently moving forward with an Environmental Assessment for a federally-funded, peak period exclusive bus lane along Wilshire Boulevard within the City of Los Angeles. The bus lane is anticipated to operate in the AM and PM peak periods and prohibit general purpose traffic from using the curb lane on Wilshire Boulevard between 7:00-9:00 a.m. and 4:00-7:00 p.m. The FEIR should discuss the transit and non-transit modal share of the project in the context of mobility along Wilshire Boulevard with a potential exclusive bus lane. Please contact Metro Project Manager Martha Butler if you require further information about this project. Ms. Butler can be reached at 213-922-7651 or butlerm@metro.net.

4-4

3. Westside Subway Extension: The proposed project site is located along the route of the Westside Subway Extension that was approved by the voters of Los Angeles County through the passage of Measure R in November 2008. An Alternatives Analysis Study was completed in January 2009 and a Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) is currently being prepared. A station at Wilshire/Fairfax is planned which, depending upon the size of the underground subway station construction, could be located in close proximity to the proposed Wilshire/Crescent Heights project. Some of the locations under consideration for a station are immediately adjacent to the Wilshire Crescent Heights property. Metro would request that the developer work with Metro to ensure that the design of the project, including the parking garage and ramps, coordinates with, and does not impinge on the design of the future subway tunnels and station. It will be critically important that each project accommodate the other, to avoid future expense, disruption and

4-5

delay for both parties. The current schedule for the subway in this area calls for a start of construction in 2013 and completion of construction in 2018-19.

4. Metro has had many communications with staff from the City of Los Angeles, including staff from the Planning Department, discussing a variety of land use strategies and policies that could be followed for new development projects immediately adjacent to the Westside Extension subway stations which follow best practices for "Transit Oriented Development." The federal government looks for cities and local jurisdictions to adequately plan for new development around such stations to encourage use of the transit system and reduce use of conventional development practices that rely almost exclusively on the automobile for access. Because of the heavy reliance on auto trips for the Wilshire-Crescent Heights project, significant adverse traffic impacts would be imposed on Wilshire Boulevard that might not occur if modified parking requirements and greater utilization of public transit were built into the planning for this project.

Much of Metro's discussions with the City of Los Angeles has highlighted the need not just for good transportation/transit-oriented development throughout the study area, but also the necessity to treat those projects that are close to rail stations differently for parking, pedestrian access and other factors. Metro does not see anything in the EIR for this project that treats it differently than if this project were located elsewhere in areas of Los Angeles that are not planned to be served by high capacity rail transit.

Please contact the Westside Subway Extension Project Director David Mieger for further coordination regarding this project. Mr. Mieger can be reached at 213-922-3040 or [miegerd@metro.net](mailto:miegerd@metro.net). Information about the Westside Subway Extension can be found on the Metro website at [http://www.metro.net/projects\\_studies/westside/default.htm](http://www.metro.net/projects_studies/westside/default.htm).

In addition, the following issue should be addressed:

5. Metro did not receive the Notice of Availability of a Draft Environmental Impact Report for the proposed project. Please ensure that Metro is included in future project outreach efforts.

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

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

Sincerely,



Susan Chapman  
Program Manager, Long Range Planning

cc: Renee Berlin  
Martha Butler  
Jody Feerst Litvak  
Rex Gephart  
David Mieger

4-5

4-6

4-7

4-8

From: Jimmy Liao <Jimmy.Liao@lacity.org>  
Subject: Re: ENV-2008-0729-EIR (Wilshire Crescent Heights))  
To: "BARBARA ROWE" <mhlrlvr@att.net>  
Date: Monday, August 24, 2009, 10:33 AM

RECEIVED  
CITY OF LOS ANGELES

SEP 29 2009

ENVIRONMENTAL  
UNIT

Dear Ms. Rowe,

Thank you for your comment on the Wilshire Crescent Heights DEIR. Your comment will be taken into consideration in the preparation of the Final EIR. Have a great day.

Jimmy Liao  
City Planning Department

-----  
Dear Sir,

This is a potential health hazard to the area and life threatening as the traffic on Crescent Heights now does not allow residents on Orange Street (between Wilshire and 6th Street access onto Crescent Heights and any increase in traffic will provide a "land lock" to say nothing of the health hazard if this project is approved.

5-1

Have the city planners gone completely mad or do they not have the time to visit our area and observe the traffic problems and accidents in the last few months.

5-2

Thank you for your attention

Barbara Rowe  
6151 Orange Street  
Los Angeles 90048

**From:** Joseph Blum <jblumre@gmail.com>  
**To:** <jimmy.liao@lacity.org>  
**Date:** 8/18/2009 1:17 PM  
**Subject:** Wilshire Crescent Heights

Joseph Blum 1753 Orchid Avenue, Los Angeles, CA 90028

August 18 2009

Jimmy C. Liao, City Planner

Department of City Planning

200 North Spring Street, room 750, City Hall

Los Angeles, CA 90012

EIR ENV-2008-0729-EIR

Project Name Wilshire Crescent Heights

Dear Mr. Liao;

The EIR on the project above is impressive, but does not change my position by much.

The size of the proposed development is daunting and not fitting the neighborhood. This is more

density than the neighborhood can bear from all angles (traffic, parking, quality of life, pollution

visual clutter etc.).

I understand the need for the owner to get more income from this property and the fact that the zoning

probably permit much higher use that is there now. However fail to see the need to make it this large

and more importantly I fail to see that the City would want to allow such dense development in this

neighborhood.

They are proposing excellent parking for the building but you know that adding busy driveways to this



intersection which is already very busy will impact things badly. Further you also know that visitors,

vendors, delivery trucks etc. will park on side streets already heavily impacted. On 6th Street, where

my properties are, parking is so bad that residents have resorted to parking restrictions as well as using

the front of their properties to park.

The neighborhood density has increased dramatically in the last few years with the construction and

consequent success of the GROVE. That success has brought in dozens of large residential developments.

Non of those have been this tall or concentrated and that has worked in keeping the nature of this area

reasonable and livable.

Without going to details on other areas impacted, I would like to suggest that the project be reduced

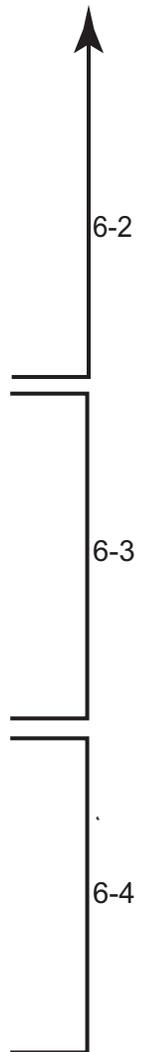
to the proposal that would cut the number of units by 1/3 (100). This proposal would give the owner

a substantial increase in income while capping the density and size to a more reasonable fit with the

neighborhood.

Sincerely

Joseph Blum



6227 Warner Drive  
Los Angeles, CA 90048  
August 17, 2009

RECEIVED  
CITY OF LOS ANGELES

AUG 19 2009

ENVIRONMENTAL  
UNIT

JimmyLiao  
EIR Unit  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Re: EIR Case No. ENV-2008-0729-EIR

Dear Mr. Liao,

I have long opposed the plan for a 21 story, multi-use building at the corner of Wilshire and Crescent Heights. The additional congestion in an area that is overly-congested now is the prime reason, as we residents have to struggle already with a vast amount of traffic and noise. An additional 432 cars is inconceivable! Air quality will worsen, too. Then there is the issue of a high-rise casting shade/shadow.

Please add my voice to those who oppose this plan.

Sincerely,

  
Carolyn Brown

7-1

**From:** Christine Scotti <christine@scottidesigngroup.com>  
**To:** <jimmy.liao@lacity.org>  
**Date:** 8/25/2009 5:19 PM  
**Subject:** ENV-2008-0729-EIR (Wilshire Crescent Heights) Proposed Development

Dear Mr. Liao,

I am writing in reference to the proposed development located at 652-685 1/2 S. Crescent Heights Blvd and 6233-6245 W. Wilshire Boulevard, Los Angeles. I am a resident of the neighborhood where this proposed development will be located and I am writing to voice my opposition to this development.

8-1

I reside on the north side of Orange Street and we are already dealing with significant noise and vibration levels and traffic and transportation as a result of the inadequate parking lot design of the 99 cent store located on Wilshire Blvd, and the newly built seven floor condominium/retail space at the southwest corner of Fairfax Ave and Orange St. It is very frustrating dealing with the current traffic issues due to people trying to get in and out of the 99 cent store since the back entrances to the store are located on Orange St. There is a constant, significant back-up during the morning and afternoon rush hours. From my understanding, although I have not witnessed it, there have been several accidents at the end of our street as well.

8-2

Residents of Orange Street that are traveling in both the east and west directions are subjected to significant delays in gaining access to and from our street because the inadequate parking lot design, which does not have a pass through, requires people to back in and out of one side of the lot thereby trapping anyone who is trying to travel up or down Orange St.

The new retail/condominium structure that is located at the corner of Fairfax Ave/Orange St adds to the congestion as residents of that building try and exit from or gain access to their garage. I don't know if you are aware, but the structure currently has no retail tenants and it's occupancy rate for the condominiums is at a mere 15-20%. Once retail business occupy the ground floor and the occupancy rate increases, it is truly going to be a nightmare getting in and out of the east end of our street.

8-3

Additionally, our street is constantly used as a "cut-through" for people trying to avoid the traffic congestion at the Fairfax Ave/Wilshire Blvd and Crescent Heights Blvd/Wilshire Blvd intersections. We deal with an influx of cars going up and down our street on a daily basis - most with no regard for the speed limit and at all hours of the day - morning to evening. We have requested, on several occasions that a traffic study be done and speed bumps be installed in order to help with the situation, but we yet to have any resolution to this problem.

8-4

The addition of the proposed Wilshire/Crescent Heights development would not only create a massive increase in traffic and transportation, noise levels and vibration levels on our street, but it also adds to the ever-growing urban blight in this area. The approval of this development would be devastating to the residents. It would create the same blockage/back-up on the west end of the street, that we are already dealing with on the east end of the street.

8-5

I ask that the city make it a point to visit this area and see for themselves what we are dealing with. Will a public hearing be held for this proposed development? I, and many residents on this street, would like to participate and voice our opposition.

8-6

I thank you in advance for your attention.

Best,  
Christine Scotti  
6151 Orange Street, #316  
Los Angeles, CA 90048

**From:** "Vinnick, Jeffrey" <jvinnick@hbblaw.com>  
**To:** <jimmy.liao@Lacity.org>  
**CC:** <av918@aol.com>, "flo vinnick" <flovinnick@yahoo.com>  
**Date:** 8/26/2009 2:38 PM  
**Subject:** Opposition to Proposed Development at 652-658 1/2 S. Crescent Heights  
**Attachments:** \_hbblogo.jpg; 3581676\_1.pdf

Dear Mr. Liao,

Attached is my response to your August 13, 2009 letter concerning the proposed development at the above-referenced address. Please make my letter part of the record on this matter.

9-1

Thank you.

Jeffrey Vinnick

<<http://www.hbblaw.com/>> Haight Brown & Bonesteel LLP  
LAWYERS  
JEFFREY A. VINNICK <<http://www.hbblaw.com/attorneys-147.html>>  
Attorney  
6080 Center Drive  
Suite 800  
Los Angeles, CA  
90045-1574 tel: 310.215.7100  
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jvinnick@hbblaw.com <<mailto:jvinnick@hbblaw.com>>  
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Jeffrey A. Vinnick  
jvinnick@hbblaw.com

August 26, 2009

**VIA EMAIL AND U.S. MAIL**

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

Re: 652-685 1/2 S. Crescent Heights Boulevard and 6233-6245 W.  
Wilshire Boulevard

Dear Mr. Liao:

I am the owner and occupant of a four unit apartment building located at 6326 Orange Street. My building is located one-half block from the "project site." I am writing again to vigorously oppose the proposed development of a 21-story residential tower at the corner of Crescent Heights and Wilshire Boulevard. Though I believe landowners should have the right to develop their property, the proposed use is not compatible with the character and use of the neighborhood.

9-2

As stated in your August 13, 2009 letter, the proposed project will result in significant and unavoidable environmental impacts. Notably, traffic at the subject intersection is already severely congested between the hours of 7:00 a.m. and 7:00 p.m., Monday through Saturday. During the week, cars are backed up as far south as Olympic Boulevard. I often see cars travelling north on Crescent Heights block the intersection at Crescent Heights and Olympic Boulevard because of the congestion going north on Crescent Heights. The additional number of vehicles anticipated with the proposed development will adversely affect safety and the quality of life of those residents, such as myself, who drive through the intersection multiple times each day.

9-3

Jimmy Liao

August 26, 2009

Page 2

As you are undoubtedly aware, another large residential building has been planned for the northwest corner of Wilshire Boulevard and La Jolla. This second proposed new development is only one block west from the development site. That building, in addition to the one planned for the northeast corner of Wilshire Boulevard and Crescent Heights, in my opinion, will make it impossible to take reasonable steps to mitigate the adverse impact of traffic and the strain on already limited resources such as police and fire suppression services.

9-4

The neighborhood around the development site is served by limited resources that could have potentially mitigated the adverse impact on traffic resulting from the increase in persons residing in the area. For example, there is no grocery store within walking distance from the intersection of Crescent Heights and Wilshire Boulevard. Residents, such as me, have no choice but to use their vehicles to run errands. Moreover, I have reviewed the DEIR and, based thereon, believe that the proposed height of the building will cause the neighborhood north of the development site to be cast in darkness most of the day adversely affecting the quality of life for those residing on the streets north of the proposed structure.

9-5

The area around the proposed development site is truly a neighborhood. Residents know their neighbors and take great pride in their property as evidenced by the condition of the apartment buildings and single family residences and their landscaping. The character of the neighborhood around the development site should be preserved to ensure that future residents will enjoy the unique character and charm of the historically significant area. Therefore, I respectfully request that the proposed residential tower be no higher than any other building presently at the subject intersection and that the footprint of the building allow for sufficient set-back so as not to change the character of the intersection.

9-6

If you and your colleagues are inclined to approve the planned development, I suggest that the landowners be required to “give back” to the community by paying for traffic abatement measures (if any such measures are feasible) and supporting the police and fire departments who are responsible for protecting the neighborhood.

9-7

Haight Brown & Bonesteel LLP

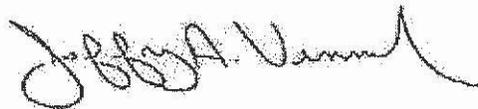
Jimmy Liao

August 26, 2009

Page 3

Thank you for your consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jeffrey A. Vinnick". The signature is fluid and cursive, with a large initial "J" and a long, sweeping tail.

Jeffrey A. Vinnick  
Haight Brown & Bonesteel LLP

JAV

**From:** <CathieLipp@aol.com>  
**To:** <jimmy.liao@lacity.org>  
**Date:** 9/24/2009 7:52 AM  
**Subject:** Opposed to project

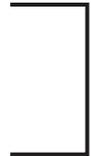
\_jimmy.liao@lacity.org\_ (mailto:jimmy.liao@lacity.org) . RE: Wilshire  
Crescent Development (ERI#ENV-20080729-EIR)-

Dear Mr. Liao,

I am against the building of this project. Even the city's environmental  
evaluation does not give it adequately high grades to warrant its building  
at the expense of the residents of the neighborhood.

Please know that many of us are watching what is trying to be foisted on  
us, and we do not appreciate it.

Cathie Kamin  
353 N. Kings Rd  
Los Angeles, 90048



10-1

**From:** Lenore Sachs <lenoresachs@sbcglobal.net>  
**To:** <jimmy.liao@lacity.org>  
**Date:** 9/24/2009 10:54 AM  
**Subject:** Wilshire/Crescent Project ----

ERI -# ENV 2008 -0729

Dear Mr. Liao,

I am writing to register my opposition to the height of the building being planned for the intersection of Wilshire Blvd. and Crescent Heights Blvd. It will surely be a nightmare for the residential community there who are suffering right now from heavy traffic congestion. What the resulting traffic will look like if the plans for the building are not scaled down is anyone's guess. I would only venture to say that it would be full-time gridlock. And who would benefit from that? Not the developers and not the public. This is the time for serious negotiation to solve this huge problem before the project gets off the drawing boards and starts to become a reality on the ground. Hoping there is a solution to be found that will satisfy both the developers and the local residential community, I am sincerely yours, Lenore Levine Sachs. -

11-1

**From:** Douglas Jefferson <dougjdnj@yahoo.com>  
**To:** <jimmy.liao@lacity.org>  
**Date:** 9/24/2009 12:56 PM  
**Subject:** wilshire crescent development

ERI#ENV-20080729-EIR

Dear Jimmy,

Whatever you can do to stop this project from happening would be a great benefit to this neighborhood. I have lived here for 25 years and have seen the neighborhood go from good to bad to worse, when it comes to the traffic, the homeless, the litter, and the lack of police support. The 99c store parking lot at the east end of Orange St. near Fairfax has only one egress and ingress. It has blocked up traffic on the block for years and no one will do anything about it because the owner is rich and doesn't care. Many fender benders take place and there is horn honking and hollering off and on throughout the day. When the cars do get free of the congestion they speed down the street toward Crescent Heights. We do not need anymore traffic in this area as it is already way to congested and you can't even find a place to park when you come home at night.

12-1

Recently there was a building built at the corner of Orange St. and Fairfax Ave. Six stories. First floor retail and five floors of condos. What a disaster. No retail has moved in on the ground level and to my knowledge only three units have been sold or rented in the entire building. Since they built it the air quality has gotten worse. Methane.

12-2

12-3

If I'm not mistaken the property at Wilshire and Crescent Heights used to be an old oil field years ago and is above a fault line.

12-4

There are plenty of places for people to move to in Los Angeles. Another high rise is not needed in an already overcrowded area.

12-5

This project is about one thing. Putting money into developers pockets.

Enough already.

Thanks for your help in stopping this project from happening.

Sincerely,  
Douglas Neal Jefferson  
323-936-2393

**From:** "Mark J. Wakim, Esq." <mjw@wakimlaw.com>  
**To:** <Jimmy.Liao@LAcity.org>  
**Date:** 9/28/2009 7:57 AM  
**Subject:** Wilshire Crescent Heights - Resident Comment

Dear Jimmy:

I am a resident of the Beverly-Fairfax neighborhood and have the following comment about the Wilshire Crescent project.

The Wilshire corridor in the immediate vicinity of the proposed development has many buildings, department stores, large "anchor" stores, and even an entire office tower sitting empty. Those properties increasingly appear abandoned. There are many examples on the 6300/6200 blocks on Wilshire.

Furthermore, a very high proportion of residential units from 6th Street north to 3rd, and from San Vicente to Fairfax remain on the rental market for long periods of time.

How does the DEIR address the project's impact on these issues? I saw none specifically addressed in the DEIR.

In my opinion, the proposal would negatively impact the residential market and discourage development of existing buildings in the vicinity.

Yours truly,

Mark J. Wakim

Attorney at Law  
P.O. Box 481130  
Los Angeles, CA 90048  
(323) 617 4499

<mailto:mjw@wakimlaw.com> <mailto:mjw@wakimlaw.com > mjw@wakimlaw.com

\*\*\*

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13-1

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//

September 28, 2009

Jimmy C. Liao, City Planner  
Department of City Planning  
200 North Spring Street, Room 750, City Hall  
Los Angeles, CA 90012  
VIA FACSIMILE 213/978-1343

EIR Case No.: ENV-2008-0729-EIR

Project Name: Wilshire Crescent Heights

Location: 652-6851 1/2 Crescent Heights Boulevard and 6233-6245 W. Wilshire Blvd,  
Los Angeles, CA 90010

Council District: CD 5

Dear Jimmy C. Liao:

After viewing the Environmental Impact Report for the proposed Wilshire Crescent Heights development I am convinced that such a project would be detrimental to the area. The scale and scope of this project would burden businesses, their employees and patrons, residents and commuters without adding significant benefit to the neighborhood or the city. Not only would the construction phase of the project impact people for an extended period, but if the plan is to go ahead as proposed it could have permanent repercussions that will create more congestion, accidents, pollution, health problems, and loss of income for the people who currently live and work here.

14-1

Traffic along the Wilshire corridor is heavy most times of the day. There is significant gridlock at the intersections of Wilshire and Fairfax, Wilshire and Crescent Heights and Crescent Heights and 6th Street. During peak hours traffic on Crescent Heights backs up past Olympic. The conditions are currently exceeding the volume of traffic these roads are designed to service. According to the report there are no solutions to this problem. The roads cannot be widened further, nor are there any traffic signals and other measures that would alleviate the congestion.

14-2

The proposed development project at Wilshire and Crescent will exacerbate the current situation by introducing some 300 new residents and their vehicles to a very impacted area. In addition, their intention to have 4 stories of businesses will significantly increase the amount of traffic far beyond what the bank currently generates.

14-3

As a resident, I can tell you there is great difficulty making safe turns from Orange Street to Crescent Heights -- not only during peak hours, but most times of the day -- and not just turning left. Turning right can be equally hazardous. Most people will tell you that we hear a crash about once week along this short stretch of Crescent Heights between

14-4

Wilshire and 6th Street. Many of these may not be reported, but they do happen and it is a great concern to residents and pedestrians.

It is my understanding that under the current scheme business traffic and some residential traffic will enter and exit from Wilshire Blvd, while much of the residential traffic will pour out onto Crescent Heights. Such a plan would overburden Crescent Heights as well as create significantly more traffic on Orange Street, as residents of the Wilshire-Crescent project will be forced to turn right on Crescent and then cut down Orange Street to continue their journey in the correct direction. The developers intend to further burden Crescent Heights with an additional driveway for the proposed town homes.

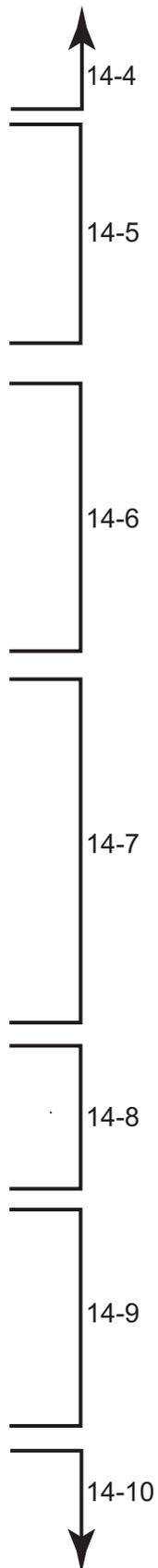
The east end of Orange Street is currently impacted by extremely heavy traffic on Fairfax and by poorly planned parking for two 99 Cents Only stores. Patrons clog the streets waiting to enter the lots, backing up local traffic. The proposed Metro station at Fairfax and Wilshire may further disrupt this end of the street. Many residents are forced to enter Orange Street from the west at Crescent Heights to get to their homes. The addition of nearly 2000 daily trips from the residents, business owners, employees and customers of the Wilshire-Crescent project will create chaos, pollution and increase in accident incidences.

The scope of this project is the biggest bone of contention among residents I have talked to. No one wants to be subjected to nearly two years of construction, noise, pollution, and vibration. We are being asked to bear the burden for something that will not benefit any of the residents or businesses in the area. There are already a great number of new housing developments within one square mile of here. Some are completed; many are empty. Significantly, there is a new mixed-use building at the end of Orange Street on the corner of Fairfax. This building was unable to sell their units, rent their units or lease their retail space in the year since its completion. There is a need for housing in Los Angeles, but certainly these plans place undue burden on an area that already services a significant amount of people, which provides ample housing.

The height of the project is a great concern to many residents. We do not wish to have our sunlight blocked, which will affect electric and heating bills and right to enjoy our gardens. One neighbor has expressed concern over the view from her condominium which will be obscured and reduce her enjoyment as well as her ability to resell it.

In addition to the environmental problems, this project impacts residents in other significant areas. There is potential for loss of income as tenants move out during construction, or due to the increase in traffic and noise and lack of local parking. Local resources such as police, fire, hospitals and schools will be stretched even further and they are already facing budget and service cuts. It is unclear what impact increased traffic to the area by residents, visitors and consumers will have on crime in this area, but it is a concern.

At a recent community meeting one of the representatives for the Wilshire-Crescent project had the audacity to say that they could legally build something much worse under



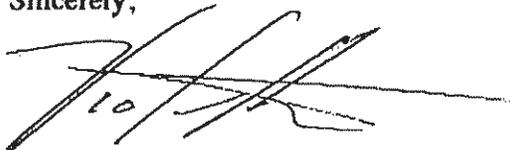
the City of Los Angeles's current building codes. It was said as if we should be thankful for the considerations they have made. Just because an area is zoned for a certain kind of business, or building does not always mean that it is a wise thing to do. Many of Los Angeles's ills have been caused by past poor city planning and here is an opportunity to ensure that trend does not continue.

The neighborhood north of Wilshire including Orange Street and 6th Street is home to a diverse demographic that is unique. We have residents of all age groups, ethnicities, and religious make-up. A significant number of senior citizens and very young children live within a few hundred feet of the proposed construction zone. Their health could be severely impacted not just in the short term by the demolition and long construction period, but permanently by the increase of pollution created by the additional traffic.

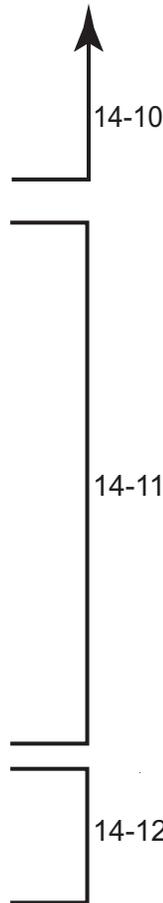
I have a three-year-old son and am very concerned about how the environment and pollution levels will affect his development and health. One of my tenants also has a three-year-old daughter with several health concerns and they have already told me that they would give notice should such a project commence. There are at least 10 children under the age of 10 within 200 feet of the construction site and many seniors as well. Not everyone will be able to afford to relocate, but the cost could be significant to their health and well-being.

Approving this project would set a precedent and allow other development companies to come in and subject the neighborhood to more high-rise buildings, overcrowding and gridlock. I urge you to not support this project as it is currently proposed.

Sincerely,



Victoria Arch  
 Property Owner  
 6221 Orange Street #4  
 Los Angeles, CA 90048



**From:** E Roach <eroach08@yahoo.com>  
**To:** <jimmy.liao@lacity.org>  
**CC:** <eroach08@yahoo.com>  
**Date:** 9/28/2009 4:49 PM  
**Subject:** REFERENCE NO: (ERI # ENV - 20080729-EIR)

This is regarding REFERENCE NO: (ERI # ENV - 20080729-EIR)

Dear Mr. Liao:

I am writing to voice my adamant opposition to the 21-story building and adjacent townhouses proposed for the NE corner of Wilshire and Crescent Heights and currently dubbed the "Wilshire/Crescent Development."

I live at Orange and Crescent Heights and we have seen a significant traffic increase on Crescent Heights in recent years and even more so after the advent of the Grove. There are already several accidents a month at just our corner, not to mention the ones that take place at 6th Street and Crescent Heights. For example, recently, after one accident took place at Orange and Crescent Heights, the driver of one car was walking across Crescent Height with his documentation and while on foot was himself hit by a car and had to be carted off by ambulance.

15-1

Furthermore, when the traffic light turns red at Wilshire and Crescent Heights, southbound traffic often backs up for two blocks or more, and those of us in our apartment building who need to turn left (north) find our exit blocked, because the driveway is south of Orange and North of Wilshire. It can take several minutes to make a left turn. I have lost track of the number of times that in order to get onto northbound Crescent Heights I have had to either a) turn right and go around the block or b) Inch into the left-hand southbound lane, then turn left into the parking lot of the bank across Crescent Height from our driveway (where the proposed project would be built), turn around and come back out again and turn right, finally managing to go north. That's the way it is now. And we are not the only ones in this situation -- there are dozens of driveways along Crescent Heights just between Wilshire and 3rd Street alone.

15-2

On top of this, we would see a significant increase in traffic due to this project. The Environmental Impact report provides a CONSERVATIVE increase of 1,665 daily trips across the intersections of Wilshire and Crescent Heights, Wilshire and Fairfax, and Fairfax and 6th. (And this does not include the increase in traffic that would result all along Crescent Heights and Fairfax in both directions between Wilshire and Melrose and beyond.)

15-3

Furthermore, the draft EIR states that at these intersections there are "no feasible physical improvements available to mitigate the project's impact at these location." It would create additional blockage at the east and west ends of Orange Street, and there are no improvements to be made at either end that would help alleviate this congestion. I attended an open house regarding this project last year, and we were told to expect hundreds of additional vehicles to park there. Quite honestly, given that fact, I feel that any effort to alleviate such a volume of traffic congestion would result in little success, if any at all.

15-4

Should this project go forward, we would be subjected to intense noise and vibration from heavy equipment and high-power tools, from 7 a.m. to 9 p.m., six days per week!! That is untenable. We are a residential neighborhood, and I do not see any aspect of this project whatsoever that could possibly be of benefit. In sum, the whole thing would be a detriment to the neighborhood, both during and after construction.

15-5

We respectfully ask that the Department of City Planning support us in opposing this proposed development.

Sincerely,  
Elizabeth M. Roach  
6300 Orange Street, LA, 90048

**From:** <mrsfeldo@aol.com>  
**To:** <jimmy.liao@lacity.org>  
**Date:** 9/28/2009 5:12 PM  
**Subject:** Wilshire Crescent Heights EIR; Env-2008-0729-EIR  
**Attachments:** Wilshire-CH EIR.doc

Dear Mr. Liao:

Please find attached a letter which addresses the draft EIR for the above project.? Please acknowledge receipt of the letter.

I will follow up with a paper copy.

Thanks,

Teresa Feldman

(323) 937-7787

16-1

September 28, 2008

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

Sent Via Email: [Jimmy.Liao@lacity.org](mailto:Jimmy.Liao@lacity.org)

Re: Draft EIR for Wilshire Crescent Heights Project; ENV-2008-0729-EIR; State Clearinghouse No. 2008051017

Dear Mr. Liao:

I am writing to discuss the draft EIR for the above-mentioned project. I wish to address the environmental impacts that cannot be mitigated on this project per the draft report, as well as items that the report states have less than significant impacts, or impacts that can be mitigated.

It is clear from the report that winter shade/shadows, construction noise and vibration levels, and traffic/transportation impacts cannot be mitigated if this project goes forward as proposed. These three items, on their face, should be enough to require an alteration of the project. However, there are other impacts that are more significant than the report shows, and there are elements unique to this neighborhood that are not fully addressed in the report. These issues must be addressed through alteration of the project, changes in the staging and construction, extensive traffic-calming measures, and consideration of unique neighborhood characteristics with regard to street layouts, and existing street vacations. In addition, the report contains assumptions regarding public services that have been rendered obsolete due to the slashing of services throughout the City and State.

Section IV.B – Aesthetics –

Orange Street, which is directly behind this project, is zoned [Q]R-3-1-O; projects are limited in height to 45 feet, to provide an appropriate transition to 6<sup>th</sup> Street, which is zoned R-2-1, and has height limits of 33 feet. While the Applicant has endeavored to orient the project to the southwest corner of the site, the proposed 21-story height does not provide for an appropriate transition to the much lower residences to the north.

16-2

16-3

The report states that the project will not impact scenic views. However, there are at least two sites in the vicinity that will have their views impacted. There is a condominium building on the north side of Orange Street that is 4 stories tall and has a rooftop deck and pool. This building's views will be affected by this project. In addition, a commercial building at 6317 Wilshire Boulevard, currently a medical office building, is scheduled for Adaptive Reuse into a hotel with rooftop garden and pool. The views to the northeast will be wiped out with the completion of the 21-story tower.

16-4

The report states that winter shade/shadow impacts cannot be mitigated under the proposed project, but even that is an understatement of the impact. The Applicant refers to several other tall buildings along Wilshire as proof that this project is appropriate for the site. However, the majority of taller projects along this stretch of Wilshire are on the south side of the street, where the shade/shadows affect only the street itself and other commercial buildings. This project is on the north side of Wilshire, near medium and low-density housing. It will cast shadows over several adjacent buildings, and the rooftop deck at 6317 Wilshire will be almost permanently shaded throughout the year, not just during the winter. A project that is shorter and less dense would be the only way to mitigate the shade/shadow impact.

16-5

#### Section IV.H – Land Use

A commercial corridor such as Wilshire Boulevard is the appropriate place for a project of the proposed height and density such as the one proposed. However, given the proximity to the much lower density neighborhood to the north, and the [Q] conditions which limit Orange Street dwellings to 45 feet in height, the Planning Department must treat this site as a transitional site, and require alterations to the project to bring it more in line with the neighborhood to the north. Alternative 4, the Reduced Height Alternative, is not an appropriate alternative, as its massing would have a different, but still negative, impact on the neighborhood. A reduction in both density and height, along with traffic calming measures, would seem to be appropriate for this project.

16-6

#### Section IV.I - Noise

The report states that the impacts of the noise from construction equipment and trucks cannot be mitigated. Table IV.I-6 lists noise levels at 50 feet. These are unacceptable levels, yet the Applicant proposes construction that is within twenty-five feet of dwellings, and also proposes a staging area that is six feet away from a residence. No project should be allowed to go forward without ensuring that the staging area be moved more than 50 feet away from any residences. In addition, the Applicant proposes to do demolition and construction between the hours of 7 a.m. and 9 p.m. Monday through Friday, and 8 a.m. to 6 p.m. on Saturday. Given the proximity to a residential area, the hours should be greatly reduced, and perhaps extra sound barriers should be erected near the affected homes, or temporary relocation of residents should take place.

16-7

Section IV.K – Public Services/ Section IV.M - Utilities

I am addressing these two sections of the draft EIR as one. Section IV.K concerns the ability of Fire, Police, Schools, Parks, and Libraries to meet the needs of an expanded population, and Section IV.M, addresses the issue of Utilities and Service Systems. The City’s annual report on infrastructure is a legally required public document that has not been done for several years and much of the data supplied for the report is several years old. Therefore, there is really no way to ascertain whether or not the existing infrastructure is adequate to absorb the increased needs of this and the related projects in the area. Two lawsuits have been filed regarding this issue.

16-8

Even with the delay in issuance of the infrastructure report, existing, older data, as well as public information regarding current budget cuts, show that infrastructure has failed to keep pace with development in the area. The City has failed to recruit and train enough police officers to support existing populations. There are scheduled closures of fire stations, which threaten the public safety.

While LAUSD data shows that Hancock Park Elementary School is under capacity and can accommodate an additional 126 students, the reality is that its 2009-2010 population, 736 students are currently enrolled, which is the school’s traditional capacity. Under an emergency provision that raises class size, the school has a temporary capacity of 800 students, but the true capacity hovers around 740. In addition, while the total capacity is currently 800, the actual capacity is much lower due to limited facilities for younger children. The school cannot absorb additional students without major alterations in the school facilities. On the list of related projects, there are three projects that fall within the elementary school boundaries, one being built with an estimated increase of 27 students, and two proposed, with 65 additional students. This project estimates 32 elementary school students. The total number of students added to the attendance area is 124, well over capacity.

16-9

Regarding Parks and Recreation: They City has consistently shown that park space in the Wilshire Plan Area lags well behind the ideal of 4 acres per 1,000 people, and even the City’s average of .76 acres per 1,000 residents. The Wilshire Plan Area has only .23 acres of recreational space per 1,000 residents, and that figure has not changed for many years. While the project may provide open space and recreational space for residents, it falls short of the estimated 1.62 acres it is estimated that this site will demand. Our local park space has been encroached upon by the construction of museum space both at Hancock Park and Pan Pacific Park, and the collection of Quimby Fees has not led to the acquisition of new land for open space. This project could address the public open space shortage by providing extra open space at their site, perhaps a pocket park in lieu of the town homes.

16-10

As for Utilities, City residents are experiencing drastic increases in water and electricity rates, both to encourage conservation and to raise funds for much needed upgrades and

16-11

repairs. It is irresponsible for the City to add dwelling units when the infrastructure clearly needs time to catch up with demand.

#### Section IV.L – Traffic/Transportation

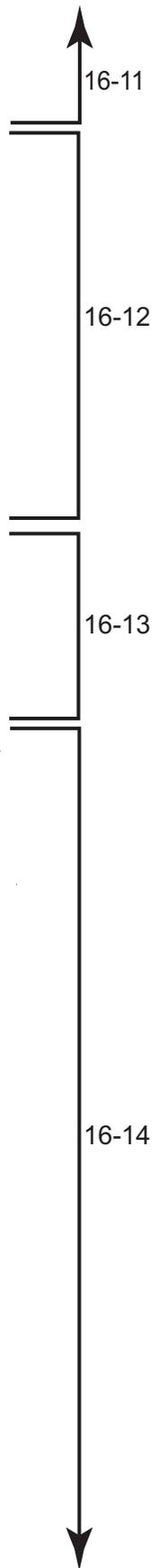
The report states that traffic impacts cannot be mitigated at three specific intersections surrounding the project. This is correct. However, that is not the complete story. It is obvious that the increase in traffic due to the project, without additional measures to add capacity, will have a detrimental and devastating impact to surrounding collector and local streets. Also, the traffic study does not take into account the proposed BRT lane on Wilshire, which could have the undesired consequence of funneling automobile traffic off of Wilshire and onto 6<sup>th</sup>. Finally, There are unique neighborhood characteristics that make it impossible to add car trips without detrimental impact on the surrounding neighborhood, unless significant traffic calming measures are implemented.

In the past, the City has allowed for street vacations in the neighborhood to benefit large developments. Park La Brea has been gated, effectively limiting north south traffic to Fairfax and Hauser; construction of the Grove and closure of the CBS site has eliminated several through streets, and LACMA recently closed Odgen Drive to through traffic from Wilshire to 6<sup>th</sup> street. City policy has limited drivers' choices.

The residential area between Fairfax and Crescent Heights, from Third to Wilshire, is in a unique position and faces unique challenges to neighborhood character. These residential streets are tucked between two secondary highways, and are always impacted by cut-through traffic. 6<sup>th</sup> Street between Fairfax and Crescent Heights is in an especially vulnerable position, as it is the first block west of Fairfax, where 6<sup>th</sup> changes from a secondary highway to a collector street. The City has attempted to discourage traffic from using 6<sup>th</sup> Street west of Fairfax for commuting, by changing striping, the timing of lights, and the installation of a landscaped median, but it still has a great deal of traffic. Crescent Heights, through the residential area, is a modified secondary highway, but should be viewed as a collector street in terms of traffic. The limited number of through streets in the area and the constant gridlock on northbound Fairfax between Wilshire and 3<sup>rd</sup>, lead to a concentration of cars on 6<sup>th</sup> and Crescent Heights. In addition, Orange Street between Fairfax and Crescent Heights sees a great deal of traffic from the 99 Cent Only Store, as well as from cut through traffic.

The traffic study shows a fairly even distribution of cars on the streets surrounding the project, but, as a practical matter, most of the traffic will end up turning north on Crescent Heights and east on either Orange or 6<sup>th</sup> Streets. Any cars using the Wilshire exit have to turn right, and they will go right at Crescent Heights and right on 6<sup>th</sup> if they want to head downtown. Those wanting to go south will turn right on Crescent Heights, turn right on Orange, and go southbound on Fairfax. Those who use the Crescent Heights exit will do the same thing.

As for residents entering the project, again 6<sup>th</sup> Street and Orange Street will bear the most of the traffic. It is not practical for residents to sit on southbound Crescent Heights and



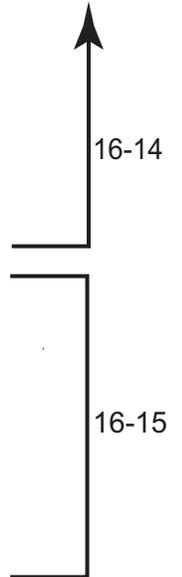
wait for traffic to let them turn left into the project; therefore, they will proceed eastbound on either 6<sup>th</sup> or Orange, go south on Fairfax, east on Wilshire, and then enter the building. Without turn restrictions, traffic calming measures, making streets one way, or street closures, Orange and 6<sup>th</sup> will see a much more significant impact than the traffic study shows. A project of lesser height and density would have fewer car trips, and would lessen the impact on these streets.

Given the significant and unavoidable impacts on the neighborhood as outlined in the draft EIR, and the additional factors that cause a significant impact on the neighborhood, the Applicant must be required to put forward an alternative project that will address the issues. An appropriate project would be one that retains the feel of a new, modern building, and that recognizes its location on Wilshire Boulevard while acknowledging that it is on a transitional site. It is commendable that the Applicant has oriented the project toward the Wilshire end of the site, but additional changes and mitigation measures are needed to maintain neighborhood character.

Sincerely,

Teresa Kiely Feldman  
6231 West 6<sup>th</sup> Street  
Los Angeles, CA 90048

(323) 937-7787



**From:** <amyg93@aol.com>  
**To:** <jimmy.liao@lacity.org>  
**Date:** 9/29/2009 10:06 AM  
**Subject:** Wilshire and Crescent Heights,

Dear Sir:

What is going on???? Our infrastructure cannot hold all this development.

Is there no end to this?? As it is, the residents that live here cannot get thru and now this.

Please, please do something to prevent this useless project.

Amy Galaudet

Tom Challenger

6120 W. 5th St.

Los Angeles, Calif 90048

17-1

**From:** <mjw@wakimlaw.com>  
**To:** "Jimmy Liao" <Jimmy.Liao@lacity.org>  
**CC:** <mjw@wakimlaw.com>  
**Date:** 9/29/2009 1:40 PM  
**Subject:** Re: Wilshire Crescent Heights - Resident Comment(ENV-2008-0729-EIR)

Thank you for your response, Jimmy. I look forward to meeting you if we have that opportunity.

It is important to discuss the impact a multi-residential project would have on an area that is already saturated with properties available for leasing. Nonetheless, I also have the following concern about traffic, which probably fits more squarely within the DEIR.

18-1

The proposed project would change 6th Street into an East/West throughfare for the project's additional residents, their guests, service vehicles, etc. That would occur because the proposed building, on a corner property, would use both Wilshire and Crescent Heights for direct access, and also 6th, Orange, and Fairfax for indirect access.

18-2

Traffic to and from the building naturally would flow one block north to 6th, especially to head East, rather than sit at an extra light for Wilshire.

This kind of change would substantially, and negatively, impact a neighborhood that still feels like a "neighborhood" in Los Angeles. 6th Street only has one lane in either direction, with parking and no bike lane. It is also lined with sycamores and front yards.

18-3

In my opinion, the proposed concentration of residents is way too high and poses an unnecessary challenge to the area. Traffic at the intersections of Fairfax/Third and Fairfax/Beverly is unmanageable at times, largely due to the Palazzo project adding to the stress contributed by Park LaBrea and the rest of the neighborhood. I think similar concerns exist here at the intersections of Wilshire/Cres. Hghts., Wilshire/Fairfax, and 6th/Fairfax.

18-4

Please tell me what are the next steps prior to submitting the final EIR? Also, how may the public continue to participate during the entire review process? I would like to learn more and make a positive contribution.

18-5

Yours truly,

Mark Wakim

20 September 2009

Mr. Jimmy Liao – EIR Unit  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

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CITY OF LOS ANGELES

SEP 29 2009

ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Liao,

My name is Christine Scotti and I am writing on behalf of a group of residents, myself included, at 6151 Orange Street. We are located within the immediate area of the proposed Wilshire Crescent Project and as residents of this community we would like to voice our opposition to this project.

19-1

We are deeply concerned with issues that have been raised in the draft EIR provided by the LA Department of City Planning as well as other issues not brought up. The most significant of these issues being the following:

1. Traffic and Transportation

We are already heavily burdened with traffic from Fairfax Avenue on the east and Crescent Heights on the west. Additionally, there are two 99¢ stores in the immediate area (Wilshire & Fairfax and Fairfax & 6<sup>th</sup> St), placing another traffic burden on Orange Street. Residents of Orange Street that are traveling in both the east and west directions are subjected to significant delays in gaining access to and from our street because of the inadequate parking lot design at the Wilshire/Fairfax store. This lot does not have a pass through, requiring people to back in and out of one side of the lot thereby trapping anyone who is trying to travel up or down Orange Street. At the same time, people are trying to access the Fairfax/6<sup>th</sup> St store through the alley behind the store parallel to Fairfax Ave, and this causes additional delays, accidents, and back-ups along the east end of our street.

19-2

Per the draft EIR, there will be a significant increase in traffic at multiple intersections in the immediate area. The three most significant areas, Wilshire/Crescent Heights, Wilshire/Fairfax, and Fairfax/6<sup>th</sup> Street currently surround Orange Street. The draft EIR notes a conservative estimate of an increase in the number of daily trips to be approximately 1,655 across these three intersections, which will result in a significant increase in the amount of traffic and transportation along Orange Street. Our street is constantly used as a "cut-through" for people trying to avoid the traffic congestion at these three intersections. We deal with an influx of cars cutting up and down our street on a daily basis - most with no regard for the speed limit and at all hours of the day and this will only intensify if this proposed development is approved.

19-3

Lastly, the draft EIR states that at these intersections there are "no feasible physical

19-4

improvements available to mitigate the project's impact at these locations." This proposed development would create additional blockage at the east end of Orange Street as well as significant blockage at the west end of Orange Street and there are no improvements to be made at either end of Orange Street that would help alleviate this congestion for the residents.

19-4

## 2. Noise and Vibration Levels

In addition to the permanent increase in noise and vibrations levels as a result of the significant traffic/transportation increase, we are concerned with the increase in noise and vibration levels during the 18-month construction period. From 7AM-9PM, six days a week, residents would be subjected to intense vibration and noise increases from heavy equipment, generators, high-powered tools as a result of the demolition, clearing, and construction of the proposed development.

19-5

It is also our understanding that city of Los Angeles METRO plans a subway stop at the Wilshire/Fairfax intersection within the next several years which again is going to create huge environmental, parking/traffic issues, and noise and vibration issues within very close proximity of the planned development.

19-6

Additionally, during the construction process there are invariably areas of the adjoining streets that are cordoned as parking spaces for heavy equipment, which increases the noise and vibration levels to the residential area while this equipment is moved in and out of the project site.

19-7

## 3. Aesthetics, Views and Obstructions

Contrary to the draft EIR report, the residents of 6151 Orange Street do not feel that the proposed project would add any significant visual character or aesthetic quality to our neighborhood. Based on the provided rendering, the building shows no unique architectural or design characteristics that set it apart from any of the immediately surrounding buildings. We do not feel, nor necessarily want, another tall building contributing to "a more dynamic landscape and skyline." We also do not feel that the proposed development would complement any of the other uses within the area. From where we reside, it will look like another concrete and glass tower with a fresh coat of paint.

19-8

For the residents on the south side of the building and for those residents who are utilizing the pool facilities on the top of the building, their southwest view would be completely obstructed as a result of this proposed structure.

Most importantly, the quality of a city view is taken into consideration in property valuation. Contrary to the EIR, the building would obstruct the view of south facing residences thereby further reducing property values in an already declining market.

19-9

At present we have a significant and unobstructed view toward the southwest, which provides us with a clear, open view of the sky, trees and on clearer days, the South Bay area and the Pacific Ocean. Again, contrary to the draft EIR, we VALUE

this view and do not wish to have it disappear for the sake of this proposed development.

19-9

#### 4. Winter Shade/Shadows

According to the draft EIR, there will be significant impact on our neighborhood with regards to winter shade and shadows. The winter shade/shadows would directly affect adjacent properties resulting in a loss of natural light and warmth for the residents in the immediate area and within these properties.

19-10

#### 5. LEED Construction Practices

As residents of 6151 Orange Street, we were very disheartened at the lack of accountability this proposed development will have in the role of global climate change. While it may be true that this specific project is too small to have any significant impact on global climate change, it is this type of rhetoric that will continue to let companies skate by the issue of global warming. Yes, one project alone may not have an impact, but the thousands of current projects under construction in the Los Angeles Metropolitan Area do have a significant negative impact on global climate change. To not hold companies accountable for the practices used in the construction of large-scale developments such as these we are turning a blind eye to the negative impacts on the environment that these projects have.

19-11

While the development company states that the residential portion of their development will be "constructed to maximize building efficiency with *LEED* characteristics..." there are substantially more *LEED* practices that could be and should be implemented for a project of this magnitude. At a minimum, we should demand that the proposed development implement the following *LEED* programs:

- *LEED Core & Shell* - practices which covers base building elements such as structure, envelope and the HVAC system
- *LEED New Construction* - which includes the incorporation of recycled materials, using certified wood and recycling construction debris
- *LEED for Commercial Interiors* - which covers sustainable sites, water efficiency, energy and atmosphere, materials and resources, indoor environmental quality, and innovative applications

19-12

#### 6. Public Service Resources

In addition to the current proposed development, there are several other developments within the immediate area (less than 1 mile from the site) that would rely on public service resources; fire, police, parks & recreation, and library. On Wilshire Blvd alone, there are currently four new developments or redevelopments which are under construction including:

19-13

- a. Wilshire & La Brea - 14 story mixed-use development, 645 residential units

b. 5528-5500 Wilshire Blvd – 11 story mixed-use redevelopment, 175 residential units

c. 5550 Wilshire Blvd – 6 story mixed use development, 163 residential condominiums

d. 5600 Wilshire Blvd – 6 story mixed use development, 284 residential units. Ground floor commercial currently only occupied by one tenant.

e. 637 S. Fairfax Blvd – 7 story mixed use development, ~30 residential condos. Currently this property is in foreclosure after a failed sales and lease effort. Currently, there are only ~4 units leased and the ground floor commercial currently has no tenants.

This totals approximately 1300 residential units with a one-mile vicinity of the proposed development.

Contrary to the draft EIR, we feel this puts a heavy burden on our public resources, most of which are facing serious budget cuts due to the financial crisis that the city of Los Angeles is currently experiencing. As recent as one week ago, it was revealed that city employees, including accountants, building planners, librarians and maintenance crews were facing layoffs and furloughs.

The city has already laid off 300 police cadets and is considering a proposal to freeze LAPD hiring. The Fire Department has been instructed to cut salaries and has already begun taking fire trucks and ambulances out of service.

As residents of this community, we feel that this and many other development companies are operating under the “If you build it, they will come” mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

We ask that the Los Angeles Department of City Planning support us in opposing this proposed development.

Sincerely,



Christine Kollig Scotti  
6151 Orange Street, #316  
Los Angeles, CA 90048  
323.842.4032  
cscotti@me.com

19-13

19-14

**Sally Boehm**

**From:** deniselampron@aol.com  
**Sent:** Tuesday, September 01, 2009 5:12 PM  
**To:** BETTY.WONG@LACITY.ORG  
**Subject:** Wilshire Crescent Heights Project | EIR Case No. ENV-2008-0729-EIR

RECEIVED  
CITY OF LOS ANGELES

SEP 29 2009

ENVIRONMENTAL  
UNIT

Ms. Wong,

As our Neighborhood Empowerment Analyst for the Mid City West Community Council, I am writing to you regarding the above matter.

As a resident within the Mid City West Community Council (6151 Orange Street), my neighbors and I are deeply concerned about the pending project at Wilshire and Crescent Heights and would like to contact our neighborhood council representative. Are you this individual or can you direct me to this person?

20-1

We are already heavily burdened with traffic from Fairfax Avenue on the east and Crescent Heights on the west. Additionally, there are two 99¢ stores in the immediate area placing another traffic burden on Orange Street.

20-2

Last year there was a large condo construction project at the corner of 6th and Fairfax, resulting in few if any sales. It is basically a vacant building, which raises other concerns of vagrancy.

20-3

I understand that METRO plans a subway stop at Wilshire and Fairfax in the next several years<sup>20</sup>which again is going to create huge environmental, parking and traffic issues within very close proximity of the planned development.

20-4

My neighbors and I would like to discuss all of the above issues with our representative as soon as possible. From the paperwork presented by the City of Los Angeles, we have until September 28, 2009 to submit our requests/concerns.

20-5

Thank you,  
Denise Lampron  
6151 Orange Street, Unit 319  
Los Angeles, CA 90048-4855

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

RECEIVED  
CITY OF LOS ANGELES

SEP 29 2009

RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A1-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A1-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A1-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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SEP 29 2009

ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A2-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A2-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A2-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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CITY OF LOS ANGELES

SEP 29 2009

RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A3-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A3-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A3-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A4-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A4-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A4-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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CITY OF LOS ANGELES

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ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A5-1

We are deeply concerned with the following issues:

- Traffic and Transportation
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- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A5-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A5-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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CITY OF LOS ANGELES

SEP 29 2009

ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A6-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A6-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A6-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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CITY OF LOS ANGELES

SEP 29 2009

ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A7-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
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- Winter Shade/Shadows
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- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

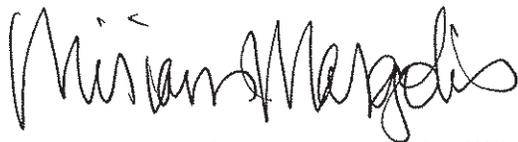
21 A7-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A7-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

RECEIVED  
CITY OF LOS ANGELES

SEP 29 2009

ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A8-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A8-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A8-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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CITY OF LOS ANGELES

SEP 29 2009

ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A9-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A9-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A9-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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CITY OF LOS ANGELES

SEP 29 2009

RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A10-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A10-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A10-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

RECEIVED  
CITY OF LOS ANGELES

SEP 29 2009

ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A11-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A11-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A11-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
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Los Angeles, CA 90036

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CITY OF LOS ANGELES

SEP 29 2009

ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A12-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A12-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A12-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

*Melida Cabrera*

Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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CITY OF LOS ANGELES

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RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A13-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A13-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A13-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

*George Ralph Shaw*

Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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CITY OF LOS ANGELES

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RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A14-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A14-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A14-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely, *Marisa Richards*

Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A15-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

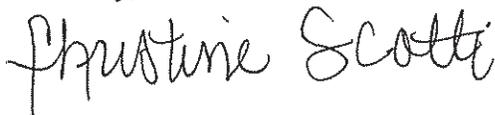
21 A15-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A15-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A16-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A16-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A16-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

MARZENA GIEUROJC



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A17-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A17-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A17-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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CITY OF LOS ANGELES

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RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A18-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A18-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A18-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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CITY OF LOS ANGELES

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RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A19-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A19-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A19-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A20-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

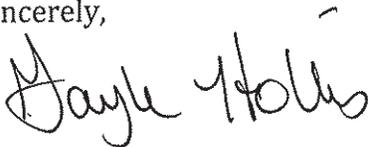
21 A20-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A20-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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SEP 29 2009

RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A21-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

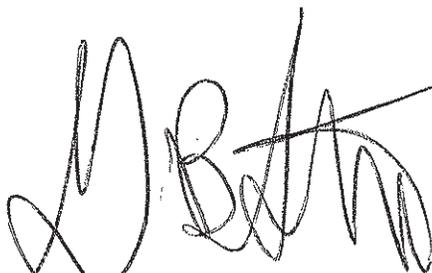
21 A21-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A21-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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CITY OF LOS ANGELES

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ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A22-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A22-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A22-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

RECEIVED  
CITY OF LOS ANGELES

SEP 29 2009

RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A23-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

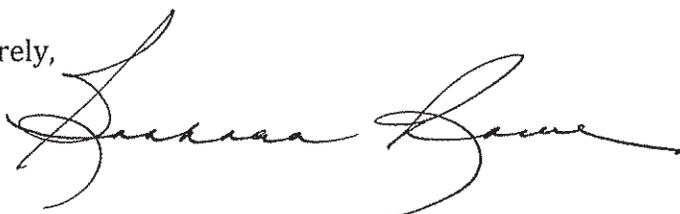
21 A23-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A23-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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CITY OF LOS ANGELES

SEP 29 2009

ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A24-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A24-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A24-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

*Christina M. Peel*  
6151 Brange Street, LA, 90048

Concerned Resident Opposing the Wilshire Crescent Project

RECEIVED  
CITY OF LOS ANGELES

SEP 29 2009

ENVIRONMENTAL  
UNITY

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A25-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A25-2

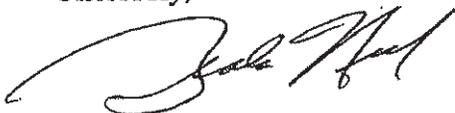
We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A25-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

6151 ORANGE ST

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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CITY OF LOS ANGELES

SEP 29 2009

RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A26-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A26-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A26-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
LIMIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A27-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A27-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A27-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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CITY OF LOS ANGELES

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ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A28-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A28-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A28-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely, *Glada Sima Maydjour*  
# 109

Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A29-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A29-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A29-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A30-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A30-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A30-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely, 

Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A31-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A31-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A31-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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CITY OF LOS ANGELES

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ENVIRONMENTAL  
UNIT

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A32-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A32-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A32-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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CITY OF LOS ANGELES

SEP 29 2009

RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A33-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A33-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A33-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project

20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

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CITY OF LOS ANGELES

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RE: EIR #ENV-2008-0729-EIR

ENVIRONMENTAL  
UNIT

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

21 A34-1

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

21 A34-2

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

21 A34-3

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,



Concerned Resident Opposing the Wilshire Crescent Project