

# Appendices

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Appendix FEIR-1

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Draft EIR Comment Letters





Sergio Ibarra <sergio.ibarra@lacity.org>

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## EIR Extension

2 messages

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**Sergio Ibarra** <sergio.ibarra@lacity.org>

**Mon, Dec 19, 2011 at 1:40 PM**

To: Alan Lin <alan\_lin@dot.ca.gov>

Hi Alan,

Just an FYI, the EIR comment period for ENV-2008-2141-EIR will be extended an additional 30 days, until Wednesday, January 18, 2012.

--

Sergio Ibarra  
Major Projects  
200 N. Spring St. Suite 750  
Los Angeles, CA 90012  
213-978-1333  
[Sergio.Ibarra@lacity.org](mailto:Sergio.Ibarra@lacity.org)

---

**Alan Lin** <alan\_lin@dot.ca.gov>

**Wed, Jan 4, 2012 at 2:41 PM**

To: Sergio Ibarra <sergio.ibarra@lacity.org>

Attached is Caltrans' comment letter. Hard copy to follow.

(See attached file: 111037AL-DEIR-Final.pdf)

Alan Lin, P.E.  
Transportation Engineer-Civil  
Regional Planning  
IGR/CEQA Branch  
(213) 897-8391 Office  
(213) 897-1337 Fax

Sergio Ibarra  
<sergio.ibarra@lacity.org>

To

Alan Lin <[alan\\_lin@dot.ca.gov](mailto:alan_lin@dot.ca.gov)>

12/19/2011 01:40

cc

PM

Subject

EIR Extension

[Quoted text hidden]



**111037AL-DEIR-Final.pdf**

1164K

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**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7, REGIONAL PLANNING

IGR/CEQA BRANCH

100 MAIN STREET, MS # 16

LOS ANGELES, CA 90012-3606

PHONE: (213) 897-9140

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*Flex your power!  
Be energy efficient!*

January 4, 2012

IGR/CEQA No. 111037AL-DEIR  
Referenced to  
IGR/CEQA No. 080651AL, NOP  
Boyle Heights Mixed Use Community  
Vic. LA-05/LA-10/LA-101/LA-60  
SCH # 20080651

Mr. Sergio Ibarra  
City of Los Angeles  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Dear Mr. Ibarra:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project located within the existing site referred to as the Wyvernwood Garden Apartments. The project is bounded by 8<sup>th</sup> Street to the north, Soto Street to the west, Olympic Boulevard to the south, and Grande Vista Avenue to the east.

The proposed project would replace the existing residential development, consisting of 1,187 units of rental housing, with a new mixed-use residential/commercial community that would include rental units and increased homeownership opportunities, complemented by neighborhood-serving retail and office space, civic uses, green/open space, and amenities. Specifically, the project would include up to 4,400 residential units comprised of no less than 1,200 rental units and up to 3,200 condominium units, 325,000 square feet of neighborhood-serving retail, office, and civic uses, approximately 24 acres of public, semi-private, and private usable open space and approximately 18.21 acres of planted streetscape and yard areas.

The project would develop in 5 phases with Phase 1 beginning in 2017, Phase 2 in 2021, Phase 3 in 2025, Phase 4 in 2028, and Phase 5 will be completed by 2030. The subject project is within 1,000 feet of the State facilities. Under the maximum office/retail scenario, the proposed project is estimated to generate approximately 19,382/19,640 net new daily trips, 1,507/1,458 net trips in the a.m. peak hour and 1,927/1,934 net trips in the p.m. peak hour. Moreover, a total of 37 related projects have been identified within a two mile radius of the project site. Many of the trips will utilize State facilities and possibly cause existing congestion to further degrade if no improvements are implemented. The Draft Environmental Impact Report (DEIR) prepared in October 2011 did not address Caltrans' traffic concerns on State facilities.

Caltrans' letter dated July 2, 2008, states that "The Department as commenting agency under CEQA has jurisdiction superceding that of Metro in identifying the freeway analysis needed for this project. Caltrans is responsible for obtaining measures that will off-set project vehicle trip generation that worsens Caltrans facilities and hence, it does not adhere to the Congestion

Management Plan guide of 150 or more vehicle trips added before freeway analysis is needed. LA County's Congestion Management Program in acknowledging the Department's role stipulates that Caltrans must be consulted to identify specific locations to be analyzed on the State Highway System." In addition, when Caltrans is a consulting agency as defined by Public Resources Code section 21092.4, the lead agency must consult with Caltrans regarding the effect of the project on the State highways. A meaningful analysis of the effect of a proposed project on the State's highways can only be done if the necessary information is provided; therefore a traffic impact study would have to be prepared. The DEIR did not provide traffic analysis referenced to Caltrans' letter dated July 2, 2008.

The intent of the Congestion Management Act is to assist federal, state, and local agencies in developing and implementing comprehensive planning strategies to handle traffic congestion. (Gov. Code, §65088.) It does not relieve Caltrans of its duties under Streets and Highways Code section 90 and 92. In other words, the Congestion Management Act is a planning tool it is not used to dictate to Caltrans operational and safety standards for highways within its jurisdiction. Therefore, a supplemental traffic study is necessary to comply with CEQA requirements in addressing the following traffic issues in addition to the Traffic Impact Study for the Boyle Heights Mixed-Use Project, dated July 2011, prepared by Fehr & Peers:

1. The section of freeway on I-10, US-101, I-710, SR-60 and I-5 within the project vicinity is currently operating at LOS F, therefore, additional traffic added resulting from the proposed project will likely to impact freeway operations. Traffic analysis of the mainline should be prepared accordingly. We are aware of the SCAG Regional Transportation Plan and Regional Transportation Improvement Program in the area. However, the funding and schedule of those improvements are not committed at this time. Alternate mitigation measures should be proposed to alleviate the congestion on State facilities in the near term.

Mitigating cumulative traffic impacts on State highways may present some challenges. Given that the Los Angeles County's CMP debit and credit system has been suspended, Caltrans recommends that the City consider an alternate local funding plan towards regional transportation improvements. Local funding efforts may include a city, region, or community wide traffic impact fees such as the West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA-TIMP).

2. In the Appendix F of the Traffic Impact Study (TIS), Table F-3 Existing (2008) Off-Site Un-signalized Intersections LOS & Signal Warrant Analysis indicates that the intersection of I-5 SB off-ramp and 4th Street is operating at LOS F for both AM and PM peak periods in the existing and future condition. Traffic mitigation other than signal controller upgrades may be needed.
3. The CMA (Critical Movement Analysis) is used to evaluate traffic operations at the study intersections, but does not address the impact to the off ramp diverge area and queuing. An existing/future ramp analysis should be conducted that includes queue lengths to determine whether traffic will back up onto the freeway through lanes at those intersections operating at LOS D or worse. These include the following off ramps intersections:

- Intersection #1 WB I-10 @ Soto St. off-ramp
  - Intersection #3 EB I-10 @ Soto St. off-ramp
  - Intersection #10 NB I-5 @ 4<sup>th</sup> St. off-ramp
  - Intersection #24 EB Rte 60 @ Lorena St/Whittier Blvd. off-ramp
  - Intersection #31 WB I-10 @ Santa Fe Ave. off-ramp
  - Intersection #33 SB I-5 @ Soto St. off-ramp
  - Intersection # 43 EB I-10 @ Santa Fe Ave. off-ramp
  - Intersection #75 NB I-710 @ Atlantic & Bandini Blvd. off-ramp
  - WB SR-60 @ Indiana Street off-ramp
  - EB SR-60 @ Whittier Blvd. off-ramp
  - I-5 NB @ Grande Vista Avenue off-ramp
  - I-5 NB @ Ditman off-ramp
4. The report should include the analysis/queuing analysis of the following un-signalized intersections identified in Appendix F:
- A-SB Rte 101 @ 4<sup>th</sup> St. off-ramp
  - B-SB I-5 @ 4<sup>th</sup> St.
  - E- SB Rte 101 @ 7<sup>th</sup> St.
  - F-EB I-10 @ Boyle Ave.
5. From the City of Los Angeles inter-departmental correspondence, dated October 1, 2010, Attachment 1 summarizes the traffic impact analysis at the various intersections showing existing traffic (2010) V/C ratios. In the report on Table 10 Existing (Year 2008) Intersection Levels of Service, page 31 of the TIS, existing traffic (2008) V/C ratios appear to be identical, even though it is a different year. Explain the discrepancy.
6. The TIS needs an explanation of the criteria in defining the freeway segment boundaries for study outlined on page 66. Traffic volumes generated by the Project Only (Tables 22 and 23 CMP Freeway analysis-AM/PM peak Hour, pages 67-70) indicate that traffic has not dissipated at each boundary end while the freeway is operating in an unstable or forced flow condition (LOS E or F) during the AM and/or PM peak hour. It appears that Project traffic has an impact on additional freeway segments not studied. Also, Caltrans' Guide for the Preparation of Traffic Impact Studies states that if the state facility is operating at less than a target LOS between C and D, the existing measures of effectiveness should be maintained. The report also needs to provide the assignment of freeway on/off ramp traffic volume due to the Project Only.
7. When the traffic impacts are identified in the supplemental traffic report, the project is responsible for its fair share towards the cost of any proposed improvements for all identified impacted freeway segments and ramps.
8. In section 11, Construction Impact Analysis, page 143 of TIS, during the construction period, haul activity should be confined to daylight non peak hours, not from 7 am to 5 pm Monday through Friday as proposed.

9. On page 52 of the TIS, how are the estimates for internal capture reflected in Tables 16 Trip Generation Estimates (Maximum Office Scenario) and Table 17 Trip Generation Estimates (Maximum Retail Scenario)? On page 66 of TIS, what time period were existing freeway traffic volumes taken from PEMS to develop the Existing (2008) condition? Explain why the PROJECT ONLY traffic volumes shown in Tables 22 & 23 CMP Freeway Analysis-AM/PM Peak Hour in the TIS differ from the PROJECT ONLY traffic volumes shown in Tables 3 & 4 Existing Plus Project CMP Freeway Analysis-AM/PM Peak Hour of Appendix I, Sunnyvale Supplemental Analysis.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water.

Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from the Department. It is recommended that large size truck trips be limited to off-peak commute periods.

In the spirit of mutual cooperation, again, we would like to invite the lead agency, City of Los Angeles and the consultants, to the Caltrans office to discuss traffic project/cumulative impact, mitigation, and fair share contributions towards planned freeway improvements. Please contact this office at your earliest convenience to schedule a meeting in the near future.

If you have any questions, please feel free to contact me at (213) 897-9140 or Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 111037AL.

Sincerely,



DIANNA WATSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse  
Jon Foreman, City of Los Angeles

**NATIVE AMERICAN HERITAGE COMMISSION**

915 CAPITOL MALL, ROOM 364  
SACRAMENTO, CA 95814  
(916) 653-6251  
Fax (916) 657-5390  
Web Site [www.nahc.ca.gov](http://www.nahc.ca.gov)  
ds\_nahc@pacbell.net



October 26, 2011

RECEIVED  
CITY OF LOS ANGELES

NOV 03 2011

Mr. Sergio Ibarra, Project Planner  
**City of Los Angeles City Planning Department**  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Re: SCH#2008061123 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the "Boyle Heights Mixed-Use Community Project, ENV-2008-2141-EIR;" located in the Boyle Heights community of the City of Los Angeles; Los Angeles County, California

Dear Mr. Ibarra:

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3<sup>rd</sup> 604). The court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources, impacted by proposed projects including archaeological, places of religious significance to Native Americans and burial sites. The NAHC wishes to comment on the proposed project.

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance.' In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC Sacred Lands File (SLF) search resulted as follows: **Native American cultural resources were not identified** within the project area identified. However, the absence of archaeological resources does not preclude their existence. . California Public Resources Code §§5097.94 (a) and 5097.96 authorize the NAHC to establish a Sacred Land Inventory to record Native American sacred sites and burial sites. These records are exempt from the provisions of the California Public Records Act pursuant to California Government Code §6254 (r). The purpose of this code is to protect such sites from vandalism, theft and destruction.

The NAHC "Sacred Sites," as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Special reference is made to the *Tribal Consultation* requirements of the California 2006 Senate Bill 1059: enabling legislation to the federal Energy Policy Act of 2005 (P.L. 109-58), mandates consultation with Native American tribes (both federally recognized and non federally recognized) where electrically transmission lines are proposed. This is codified in the California Public Resources Code, Chapter 4.3 and §25330 to Division 15.

Furthermore, pursuant to CA Public Resources Code § 5097.95, the NAHC requests that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq.*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of the NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

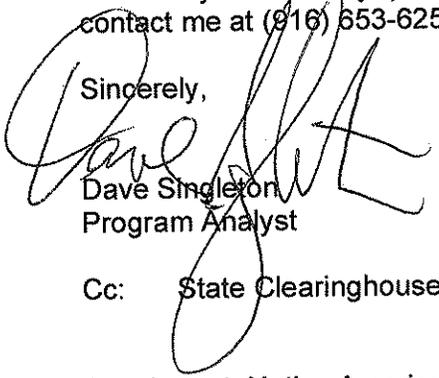
Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be

followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,



Dave Singleton  
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

## California Native American Contacts

Los Angeles County

October 26, 2011

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

Gabrielino Tongva Nation  
Sam Dunlap, Chairperson  
P.O. Box 86908  
Los Angeles , CA 90086  
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Gabrielino Tongva

(909) 262-9351 - cell

Ti'At Society/Inter-Tribal Council of Pimu  
Cindi M. Alvitre, Chairwoman-Manisar  
3098 Mace Avenue, Aapt. D Gabrielino  
Costa Mesa, , CA 92626  
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(714) 504-2468 Cell

Gabrielino Tongva Indians of California Tribal Council  
Robert F. Dorame, Tribal Chair/Cultural Resources  
P.O. Box 490  
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562-761-6417 - voice  
562-761-6417- fax

Gabrielino Tongva

Tongva Ancestral Territorial Tribal Nation  
John Tommy Rosas, Tribal Admin.  
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Gabrieleno/Tongva San Gabriel Band of Mission  
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626-676-1184- cell  
(310) 587-0170 - FAX  
760-904-6533-home

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

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

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2008061123; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Boyle Heights Mixed-Use Community Project; located in the Boyle Heights neighborhood in the City of Los Angeles; Los Angeles County, California.

**California Native American Contacts**  
Los Angeles County  
October 26, 2011

Gabrieleno Band of Mission Indians  
Andrew Salas, Chairperson  
P.O. Box 393                      Gabirelino Tongva  
Covina                      , CA 91723  
(626) 926-4131  
gabrielenoindians@yahoo.  
com

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

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

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2008061123; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Boyle Heights Mixed-Use Community Project; located in the Boyle Heights neighborhood in the City of Los Angeles; Los Angeles County, California.



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# DEIR Comments Boyle Heights Mixed-Use Community Project

1 message

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**Daniel Garcia** <dgarcia@aqmd.gov>

Wed, Dec 21, 2011 at 4:58 PM

To: "Sergio.Ibarra@lacity.org" <Sergio.Ibarra@lacity.org>

Cc: Ian MacMillan <imacmillan@aqmd.gov>

The South Coast Air Quality Management District's comments are provided in the attached letter. Please be advised that you will also receive this letter by U.S. Mail.

Regards,

*Dan Garcia*

Air Quality Specialist

Planning, Rule Development, and Area Sources

21865 Copley Drive

Diamond Bar, CA 91765-4178

P: (909) 396-3304

F: (909) 396-3324



**DEIRBoyleHeightsMixedUseCommunityProject.pdf**

110K

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South Coast  
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • www.aqmd.gov

E-Mailed: December 21, 2011  
Sergio.Ibarra@lacity.org

December 21, 2011

Mr. Sergio Ibarra  
City of Los Angeles, Major Projects  
200 North Spring Street, City Hall, Room 750  
Los Angeles, CA 90012

**Review of the Draft Environmental Impact Report (Draft EIR) for the  
Boyle Heights Mixed Use Community Project**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.

Based on a review of the air quality analysis in the Draft EIR the AQMD staff is concerned about the project's significant localized and regional air quality impacts. Therefore, the AQMD staff recommends that the lead agency provide additional mitigation measures to minimize the project's significant air quality impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan".

Ian MacMillan  
Program Supervisor, CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

Attachment

IM:DG

LAC111025-06  
Control Number

### Construction Equipment Mitigation Measures

1. The lead agency determined that the proposed project will exceed the CEQA localized construction significance thresholds for PM<sub>10</sub> and NO<sub>2</sub> and the regional construction significance thresholds for VOC and NO<sub>x</sub> emissions; therefore, AQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.
  - Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NO<sub>x</sub> emissions requirements,
  - Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow,
  - Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
  - Reroute construction trucks away from congested streets or sensitive receptor areas,
  - Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM<sub>10</sub> generation,
  - Use required coatings and solvents with a VOC content lower than required under Rule 1113,
  - Construct/build with materials that do not require painting,
  - Use pre-painted construction materials, and
  - Contractors shall use high-pressure-low-volume (HPLV) paint applicators with a minimum transfer efficiency of at least 50% or other application techniques with equivalent or higher transfer efficiency.

### Operational Air Quality Impacts from Mobile Sources

2. The lead agency's operational air quality analysis demonstrates significant operational air quality impacts from criteria pollutant emissions (i.e., NO<sub>x</sub>, CO, VOC, PM<sub>10</sub> and PM<sub>2.5</sub>) in an area that already exceeds state and federal ambient air quality standards. A substantial portion of these impacts are from mobile source emissions related to vehicle trips associated with the proposed project. Based on the traffic impact analysis summarized in chapter four of the Draft EIR the lead agency determined that the proposed project will result in significant traffic impacts from additional trips generated by the proposed project. Specifically, these impacts will occur at some of the most highly congested intersections surrounding the project site. For example, the lead agency determined that the project will significantly impact the Soto Street and Olympic Boulevard Intersection (identified as Intersection 46). As a result, the AQMD staff is concerned that in addition to regional air quality impacts these significantly impacted traffic intersections could contribute to cumulative local air quality impacts that have not been addressed in the Draft EIR.

The arterial streets that surround the project site are highly used by truck traffic and passenger vehicles traveling from major freeways (i.e., Interstate -10, Interstate -5,

101-Freeway and 60-Freeway) to industrial areas south of the project site based on Table 7 of the Traffic Study (Appendix L) of the Draft EIR. Therefore, the AQMD staff is concerned that additional congestion could result in the dispersion of traffic (i.e., passenger vehicles and diesel trucks) to local neighborhood roads that provide access to worker and industrial destinations. This type of traffic activity could result in additional local air quality impacts to residents. Also, the lead agency has expressed uncertainty in the effectiveness of the neighborhood intrusion mitigation if the program cannot achieve consensus among community members and stakeholders (Page IV-K-108).

Further, the project does not appear to maximize opportunities to reduce regional air quality impacts given that the additional traffic combined with impediments to active transportation (such as reduced sidewalk widths, a lack of bicycle amenities, etc.) could discourage pedestrian activity needed to maximize the use of mass transportation by residents. The lead agency only requires a single non-quantifiable mitigation measure that encourages delivery trips during off-peak traffic periods (i.e., Mitigation Measure B.1-10) to reduce mobile sources emissions. Additional mitigation measures should be included to discourage truck travel in residential neighborhoods, such as enforcement mechanisms to restrict truck parking and truck routes. In addition, the AQMD staff recommends that at a minimum the lead agency reduce the project's significant operational air quality impacts by reviewing and incorporating additional transportation mitigation measures, such as those from the greenhouse gas quantification report published by the California Air Pollution Control Officer's Association in the Final EIR<sup>1</sup>.

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<sup>1</sup> California Air Pollution Control Officer's Association. August 2010. Quantifying Greenhouse Gas Mitigation Measures. Accessed at: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Letter No. 4



Sergio Ibarra <sergio.ibarra@lacity.org>

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## SCAG Comments on the DEIR for the Boyle Heights Mixed-Use Community Project - SCAG no. I20110190

1 message

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Pamela K. Lee <LEEP@scag.ca.gov>

Tue, Dec 20, 2011 at 10:10 AM

To: "sergio.ibarra@lacity.org" <sergio.ibarra@lacity.org>

Dear Mr. Ibarra:

Please find attached SCAG's comments regarding the DEIR for the Boyle Heights Mixed-Use Community Project – SCAG no. I20110190.

Please contact me with any questions or difficulty with the attached file.

Thank you,

Pamela K. Lee

Assistant Regional Planner

Environmental & Assessment Services

Southern California Association of Governments

818 W 7<sup>th</sup> Street, 12<sup>th</sup> Floor

Los Angeles, CA 90017

T: (213) 236-1895

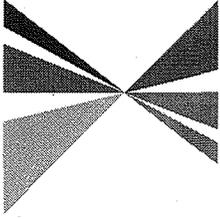
F: (213) 236-1963

[leep@scag.ca.gov](mailto:leep@scag.ca.gov)



I20110190 DEIR Boyle Heights Mixed-Use Community Project.pdf

423K



**ASSOCIATION OF GOVERNMENTS**

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Community, Economic and Human Development  
Bill Jahn, Big Bear Lake  
  
Energy & Environment  
Margaret Clark, Rosemead  
  
Transportation  
Paul Glaab, Laguna Niguel

December 13, 2011

Mr. Sergio Ibarra  
City of Los Angeles, Major Projects  
200 N. Spring Street, City Hall, Rm 750  
Los Angeles, CA 90012  
Sergio.Ibarra@lacity.org

**RE: SCAG Comments on the Draft Environmental Impact Report for the Boyle Heights Mixed-Use Community Project [I20110190]**

Dear Mr. Ibarra:

Thank you for submitting the **Draft Environmental Impact Report for the Boyle Heights Mixed-Use Community Project [I20110190]** to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372 (replacing A-95 Review). Additionally, pursuant to Public Resources Code Section 21083(d) SCAG reviews Environmental Impacts Reports of projects of regional significance for consistency with regional plans per the California Environmental Quality Act (CEQA) Guidelines, Sections 15125(d) and 15206(a)(1). SCAG is also the designated Regional Transportation Planning Agency and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Federal Transportation Improvement Program (FTIP) under California Government Code Section 65080 and 65082. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

SCAG staff has reviewed this project and determined that the proposed project is regionally significant per California Environmental Quality Act Guidelines, Sections 15125 and/or 15206. The proposed project includes mixed-use residential/commercial development intended to provide a walkable community with modern amenities and high-quality design that promotes sustainability within the Boyle Heights neighborhood located in the City of Los Angeles.

We have evaluated this project based on the policies of SCAG's Regional Transportation Plan (RTP) and Compass Growth Vision Principles that may be applicable to your project. The RTP and Compass Growth Visioning Principles can be found on the SCAG web site at: <http://scag.ca.gov/igr>. The attached detailed comments are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. We also encourage the use of the SCAG List of Mitigation Measures extracted from the RTP to aid with demonstrating consistency with regional plans and policies. Please send a copy of the Final Environmental Impact Report (FEIR) ONLY to SCAG's main office in Los Angeles for our review. If you have any questions regarding the attached comments, please contact Pamela Lee at (213) 236-1895. Thank you.

Sincerely,



JACOB LIEB, Manager  
Environmental and Assessment Services

**COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE  
 BOYLE HEIGHTS MIXED-USE COMMUNITY PROJECT [I20110190]**

**PROJECT LOCATION**

The project site is located in the southwestern portion of the Boyle Heights Community of the City of Los Angeles located approximately 14.5 miles east of the Pacific Ocean, 2 miles southeast of downtown Los Angeles, and approximately 0.4 mile east of the Los Angeles River. The 68.8 acre site is generally bordered by East 8<sup>th</sup> Street to the north, Grand Vista Avenue to the east, and Olympic Boulevard to the south, with the western boundary located parallel to and just east of South Soto Street. Nearby jurisdictions include the unincorporated East Los Angeles area of the County of Los Angeles to the east, the City of Vernon to the south, and the Cities of Maywood and Commerce to the southeast.

**PROJECT DESCRIPTION**

The proposed project involves the redevelopment of approximately 68.8 acre site with a mixed-use community providing increased housing and homeownership opportunities, neighborhood-serving retail and office uses, civic space, greens and open space amenities. As indicated therein, the project would include up to 4,400 residential units, comprised of no less than 1,200 rental units and up to 3,200 condominium units, and 325,000 square feet of neighborhood-serving retail, office, and civic uses. Upon completion of the project, there would be no net loss of rental housing units within the project site and a considerable increase in ownership housing as compared to current conditions. The project would also provide active and passive open space areas throughout the project site, including approximately 10.5 acres of privately maintained, publicly available, common useable open space. In addition, semi-private and private courtyards, plazas, and open spaces would comprise an additional 13.5 acres of open space amenities for a total of approximately 24 acres of useable open space, which would also include 2.4 acres of roof top garden spaces and recreational facilities, and 2.5 acres of private open space. The project would also include 18.2 acres of planted streetscape and yard areas. Upon completion of the project, the total amount of open space at the ground level, including publicly accessible open space, unfenced yards, streetscape, interstitial spaces, paseos and courtyards would be 37.25 acres, compared to 36.43 acres of comparable space that currently exists on the project site. Overall the project is intended to provide a walkable community with modern amenities and a high-quality design that promotes sustainability.

**CONSISTENCY WITH REGIONAL TRANSPORTATION PLAN**

**Regional Growth Forecasts**

The Draft Environmental Impact Report (DEIR) should reflect the most recently adopted SCAG forecasts, which are the 2008 RTP (May 2008) Population, Household and Employment forecasts. The forecasts for your region, subregion, and city are as follows:

**Adopted SCAG Regionwide Forecasts<sup>1</sup>**

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	19,418,344	20,465,830	21,468,948	22,395,121	23,255,377	24,057,286
Households	6,086,986	6,474,074	6,840,328	7,156,645	7,449,484	7,710,722
Employment	8,349,453	8,811,406	9,183,029	9,546,773	9,913,376	10,287,125

**Adopted City of Los Angeles Subregion Forecasts<sup>1</sup>**

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	4,140,516	4,214,082	4,292,139	4,367,538	4,440,017	4,509,435
Households	1,386,658	1,445,177	1,506,564	1,554,478	1,600,754	1,638,823
Employment	1,860,672	1,905,337	1,933,860	1,967,393	2,003,196	2,037,472

**Adopted City of Los Angeles Forecasts<sup>1</sup>**

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	4,057,484	4,128,125	4,204,329	4,277,732	4,348,282	4,415,773
Households	1,366,985	1,424,701	1,485,519	1,532,998	1,578,850	1,616,578
Employment	1,820,092	1,864,061	1,892,139	1,925,148	1,960,393	1,994,134

1. The 2008 RTP growth forecast at the regional, subregional, and city level was adopted by the Regional Council in May 2008.

**SCAG Staff Comments:**

Pages IV.1-12, IV.1-45 and IV.1-75 indicate that the DEIR population, household and employment analyses were based on 2008 RTP Regional Growth Forecasts.

The **2008 Regional Transportation Plan (RTP)** also has goals and policies that are pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

***Regional Transportation Plan Goals:***

- RTP G1** *Maximize mobility and accessibility for all people and goods in the region.*
- RTP G2** *Ensure travel safety and reliability for all people and goods in the region.*
- RTP G3** *Preserve and ensure a sustainable regional transportation system.*
- RTP G4** *Maximize the productivity of our transportation system.*
- RTP G5** *Protect the environment, improve air quality and promote energy efficiency.*
- RTP G6** *Encourage land use and growth patterns that complement our transportation investments.*
- RTP G7** *Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.*

**SCAG Staff Comments:**

Where applicable, SCAG staff finds that the proposed project partially meets consistency with Regional Transportation Plan Goals. The proposed project is not applicable to RTP G7.

Per RTP G1, SCAG staff finds the proposed project meets consistency. The proposed project is located near and improves upon existing transportation infrastructure and includes a system of bicycle and pedestrian paths to encourage alternate modes of transportation (Page IV.K-86).

SCAG staff finds the proposed project consistent with RTP G2. Per page IV.G-65, the street grid proposed would improve accessibility throughout the site and improve connectivity with the surrounding neighborhood and regional roadway network, thus increasing safety for all vehicles, pedestrians and bicyclists.

Per RTP G3, SCAG staff finds the proposed project meets consistency. The proposed project includes a comprehensive TDM program, which will reduce vehicular trips and vehicle miles traveled thereby

promoting a sustainable regional transportation system (Page IV.K-97).

SCAG staff finds the proposed project partially meets consistency with RTP G4. Per page IV.K-106, implementation of the proposed project will have significant impacts on peak hour traffic flows. Six intersections of twenty-two will not be fully mitigated to a level below significance during peak traffic conditions.

Per RTP G5, the proposed project is partially consistent. Site design objectives are based on the principles of smart growth and environmental sustainability, by including new development design to meet Silver level LEED rating. Other sustainability features within the proposed project include water conservation features such as high-efficiency toilets and drought-tolerant plants included in landscaping (Page II-38). However, during construction of the proposed project, there is potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the project site reducing the air quality.

In regards to RTP G6, SCAG staff finds the proposed project to meet consistency. The proposed project is located in an area with existing transportation infrastructure and contributes to land use patterns that facilitate the reduction of vehicular trips and vehicle miles traveled thereby utilizing land use and growth patterns to support transportation investments and infrastructure.

### **COMPASS GROWTH VISIONING**

The fundamental goal of the **Compass Growth Visioning** effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region's mobility, livability and prosperity. The following "Regional Growth Principles" are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

#### ***Principle 1: Improve mobility for all residents.***

- GV P1.1** *Encourage transportation investments and land use decisions that are mutually supportive.*
- GV P1.2** *Locate new housing near existing jobs and new jobs near existing housing.*
- GV P1.3** *Encourage transit-oriented development.*
- GV P1.4** *Promote a variety of travel choices*

#### **SCAG Staff Comments:**

SCAG staff finds that the proposed project partially meets consistency with Principle 1.

SCAG staff finds the proposed project generally meets consistency with GV P1.1. The proposed project would develop a mixed-use residential and commercial community near existing transportation improving the connectivity of the current development to the existing transportation system (Page IV.G-67).

Per GV P1.2, the proposed project meets consistency. Per page IV.G-33, the proposed project enhances residential development in connection with existing transportation infrastructure thereby locating new housing near existing jobs in downtown Los Angeles employment.

In regards to GV P1.3, SCAG staff finds the proposed project is partially consistent. The proposed project will provide a similar mix of uses in a mid-to high-rise setting that will complement the high-density, mixed-use and transit-oriented nature of the Related Project #10 at the intersection of

Olympic Boulevard and Soto Street, but does not develop transit-oriented development directly (Pages IV.G-83 – IV.G-84).

Per GV P1.4, the proposed project is consistent. Per page IV.K-49, the proposed project includes a system of bicycle routes and pedestrian paths throughout the site to encourage alternative modes of transportation and also encourages other modes of travel like public transit.

**Principle 2: Foster livability in all communities.**

- GV P2.1 *Promote infill development and redevelopment to revitalize existing communities.*
- GV P2.2 *Promote developments, which provide a mix of uses.*
- GV P2.3 *Promote "people scaled," walkable communities.*
- GV P2.4 *Support the preservation of stable, single-family neighborhoods.*

**SCAG Staff Comments:**

SCAG staff finds that the proposed project meets consistency with Principle 2.

Per GV P2.1, SCAG staff finds the proposed project meets consistency. The proposed project intends to increase residential development, both rental and opportunities for homeownership through infill development at increased densities (Page IV.G-83).

SCAG staff finds the proposed project to meet consistency with GV P2.2. The proposed project includes a mix of uses including residential (rental and condominium), neighborhood-serving retail, office, civic uses, a civic plaza and open space (Page II-1).

Per GV P2.3, SCAG staff finds the proposed project to be consistent. Landscaped pathways planned in the proposed project will be introduced throughout the project site to connect the various project elements and uses and foster a pedestrian-friendly environment (Page II-33).

In regards to GV P2.4, the proposed project will preserve single family neighborhoods. North of the project site include single-family residences which are being preserved and the proposed project will result in the removal of any single-family uses (Page IV.G-70).

**Principle 3: Enable prosperity for all people.**

- GV P3.1 *Provide, in each community, a variety of housing types to meet the housing needs of all income levels.*
- GV P3.2 *Support educational opportunities that promote balanced growth.*
- GV P3.3 *Ensure environmental justice regardless of race, ethnicity or income class.*
- GV P3.4 *Support local and state fiscal policies that encourage balanced growth*
- GV P3.5 *Encourage civic engagement.*

**SCAG Staff Comments:**

SCAG staff finds that the proposed project meets consistency with Principle 3 where applicable.

Per GV P3.1, SCAG staff finds the proposed project meets consistency. The proposed project provides up to 4,400 new residential units of various sizes, rental/ownership opportunities, and style/density configurations (Page IV.G-70).

SCAG staff cannot determine consistency with GV P3.2, GV P3.3, GV P3.4 and GV P3.5 based on the information provided in in the DEIR.

**Principle 4: Promote sustainability for future generations.**

- GV P4.1 *Preserve rural, agricultural, recreational, and environmentally sensitive areas*
- GV P4.2 *Focus development in urban centers and existing cities.*
- GV P4.3 *Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.*
- GV P4.4 *Utilize "green" development techniques*

**SCAG Staff Comments:**

Where applicable, SCAG staff finds that the project is partially consistent with Principle 4. The proposed project is not applicable to GV P4.1 as the proposed project is not located in a rural, agricultural, recreational or environmentally sensitive area.

Per GV P4.2, the proposed project meets consistency. The project is located in a highly urbanized area within the Boyle Heights neighborhood in the City of Los Angeles (Page II-4).

In regards to GV P4.3 and GV P4.4, SCAG staff finds the proposed project meets consistency. The proposed project is based on principles of smart growth and environmental sustainability through mixed-uses and reduction of vehicle trips. Also the project will be designed to incorporate LEED features capable of achieving a Silver certification rating including energy efficient buildings, pedestrian and bicycle friendly design, and water conservation features (Page IV.G-73).

**CONCLUSION**

Where applicable, the proposed project generally meets consistency with SCAG Regional Transportation Plan Goals and also meets consistency with Compass Growth Visioning Principles.

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA. We recommend that you review the SCAG List of Mitigation Measures for additional guidance, and encourage you to follow them, where applicable to your project. The SCAG List of Mitigation Measures may be found here:  
[http://www.scag.ca.gov/igr/documents/SCAG\\_IGRMMRP\\_2008.pdf](http://www.scag.ca.gov/igr/documents/SCAG_IGRMMRP_2008.pdf)

When a project is of statewide, regional, or area wide significance, transportation information generated by a required monitoring or reporting program shall be submitted to SCAG as such information becomes reasonably available, in accordance with CEQA, Public Resource Code Section 21081.7, and CEQA Guidelines Section 15097 (g).

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

<b>Letter No. 5</b>
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File: SC.CE.

DATE: December 8, 2011

TO: Sergio Ibarra, Major Projects  
Department of City Planning

RECEIVED  
CITY OF LOS ANGELES

DEC 15 2011

FROM: Ali Poosti, Acting Division Manager   
Wastewater Engineering Services Division  
Bureau of Sanitation

SUBJECT: Boyle Heights Mixed Use Community Project – Draft EIR

This is in response to your October 20, 2011 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.

**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 improvements 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>			
Residential: Studio	80 GPD/DU	22 DU	(1,760)
Residential: 1-BR	120 GPD/DU	449 DU	(53,880)
Residential: 2-BR	160 GPD/DU	640 DU	(102,400)
Residential: 3-BR	200 GPD/DU	76 DU	(15,200)
<b><i>Proposed</i></b>			
Residential	160 GPD/DU	4,400 SQ.FT	704,000
Office	150 GPD/1000 SQ.FT	150,000 SQ.FT	22,500
Retail	80 GPD/1000 SQ.FT	150,000 SQ.FT	12,000
Civic Uses	200 GPD/1000 SQ.FT	25,000 SQ.FT	5,000
<b>Total</b>			<b>570,226</b>

**SEWER AVAILABILITY**

The sewer infrastructure in the vicinity of the proposed project includes an existing 15-inch line on 8th St R/W and existing 21-inch line on 8th St. The sewage from the existing 15-inch line feeds into an 18-inch and 30-inch line on Camulos St before discharging into a

27-inch line on Soto St. The sewage from the existing 21-inch line feeds into the Dacotah Pumping Plant and then into a 21-inch force main. The flow continues into a 24-inch line on 8th St before discharging into the 60-inch North Outfall Sewer (NOS) line. According to our existing pumping data, the Dacotah Pumping Plant appears to have sufficient capacity to handle the proposed flow. Figure 1 shows the details of the sewer system within the vicinity of the project.

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
15	8th St R/W	*	3.18 MGD
21	8th St	28	3.92 MGD
18	8th St R/W	18	1.41 MGD
30	Camulos St	35	4.92 MGD
27	Soto St	67	2.94 MGD
21	8th St	*	10.46 MGD
24	8th St	24	4.07 MGD
60	Santa Monica Fwy	21	31.26 MGD

\* No gauging available

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the project.

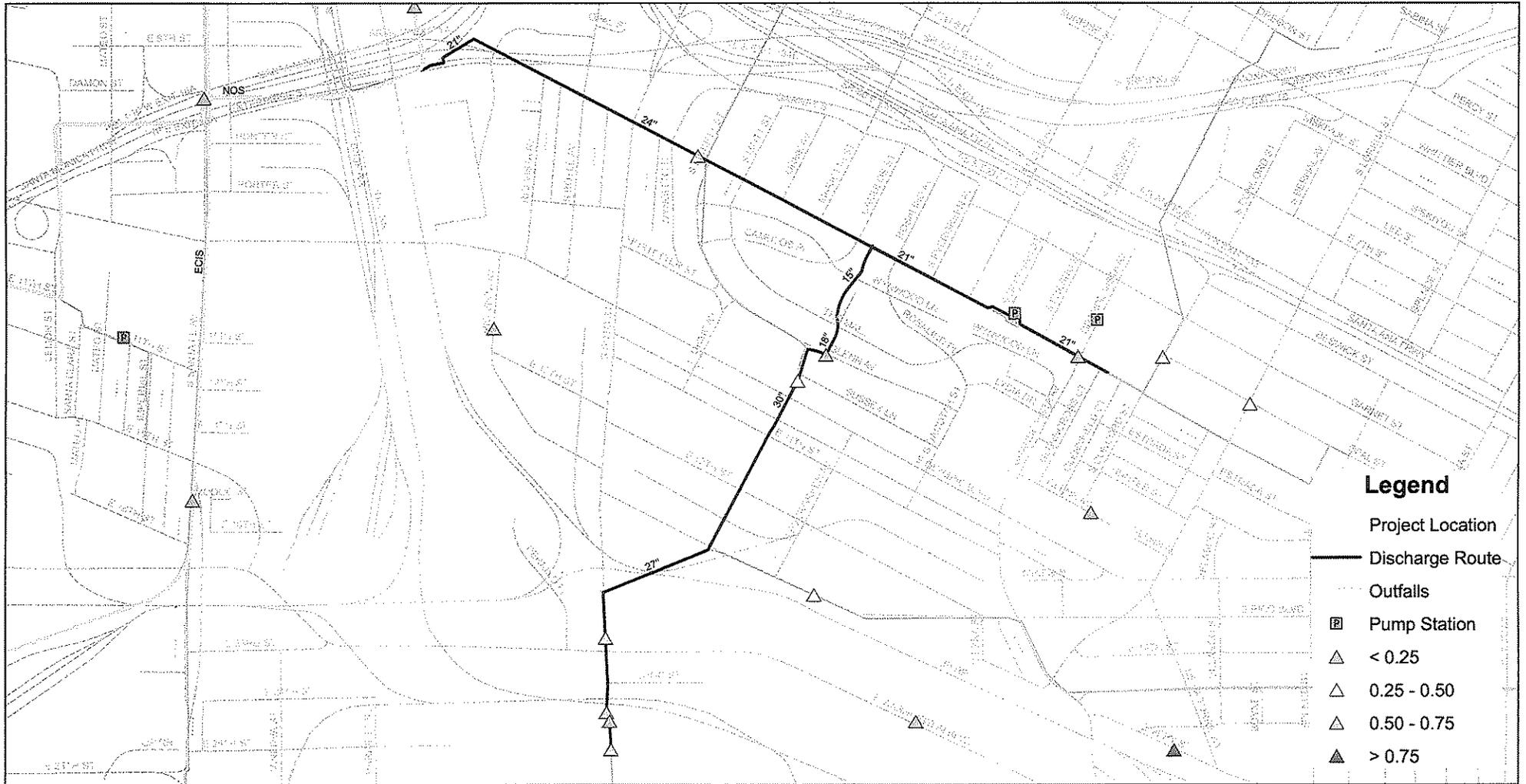
If you have any questions, please call Kwasi Berko of my staff at (323) 342-1562.

### **SOLID RESOURCE REQUIREMENTS**

The City has a standard requirement that applies 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 Daniel Hackney of the Special Project Division at (213)485-3684.

Attachments:  
 Figure 1 – Sewer Map

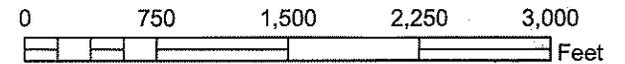
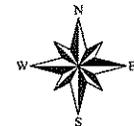
cc: Kosta Kaporis, BOS  
 Daniel Hackney, BOS  
 Rowena Lau, BOS



Wastewater Engineering Services Division  
 Bureau of Sanitation  
 City of Los Angeles



**FIGURE 1**  
**Boyle Heights Mixed Use Community Project**  
**Sewer Map**



Thomas Brother Data reproduced with permission granted by THOMAS BROS MAP



JOSE HUIZAR  
COUNCILMEMBER, 14TH DISTRICT

January 18, 2012

Mr. Michael LoGrande, Director  
Mr. Sergio Ibarra  
City of Los Angeles, Major Projects  
Department of City Planning  
200 North Spring Street, City Hall, Room 750  
Los Angeles, CA 90012

Re: Wyvernwood / Boyle Heights Mixed-Use Community Project DEIR Council  
Comments (ENV-2008-2141-EIR); State Clearinghouse Number 2008061123  
2901 E. Olympic Blvd, Los Angeles, CA 90023

Dear Mr. LoGrande and Mr. Ibarra:

On October 20, 2011, Thurman Interim California, LLC through its affiliate Fifteen Group Land and Development ("Developers") submitted a Draft Environmental Impact Report (the "DEIR") for the Boyle Heights Mixed-Use Community Project (the "Project") which will provide for the development of approximately 68.8 net acres on and around the Wyvernwood Garden Apartments ("Wyvernwood") site.

The Developers' proposed plan represents an ambitious project with up to 4,400 residential units where 1,187 presently exist – almost a four-fold increase in density and out of scale with the surrounding uses. The proposed density, request for general plan and zoning amendment changes, and requested increase in height district to allow towers up to 260 foot tall are not consistent with the current on-site (RD 1.5-1) and nearby surrounding off-site (RD 1.5-1, R2-1, and PF-1XL and OS-1XL) zoning and community scale.

Wyvernwood was designed in 1939 with the intention of promoting a strong social network among its residents and that intention has been abundantly realized in the decades since its completion. Many families, in some cases multiple generations of the same family, enjoy the vibrant and rich community within this California historically-designated district. Wyvernwood residents also have immediate access to approximately 36.5 acres of open space– a unique and rare experience among Angelenos since open space is seldom designed into modern Los Angeles multi-family developments. To that end, the City has a responsibility to ensure that the existing fabric of this community is not torn apart, nor to place additional onerous burdens on it.

Should the Project proceed, it is important to ensure that specific areas are adequately analyzed, mitigated, and addressed to the fullest extent possible. In my review of the Project, I have identified several issues of concern and which should be addressed within the scope of the DEIR. These issues are submitted within the comments below:

### **1. Density**

4,400 residential units are being sited where 1,187 units presently exist. This represents an increase of almost four times the number of existing units and is out of scale with the surrounding community. Moreover, this translates to a substantial increase in residents, car trips, and strain on the infrastructure of the community. As proposed in the DEIR, the mitigation measures are not adequate to deal with the impacts of these additional units in an already highly dense neighborhood of Boyle Heights.

### **2. Height**

Residential towers of up to 260 feet, 24 stories, where two to three story buildings presently stand, are out of scale with the surrounding largely single-family home residential community. Aesthetics, vistas, and visual impacts on the neighborhood as a whole are irreparable and there are no adequate mitigations to address these impacts.

### **3. Construction Impacts**

Several of the alternatives propose heavy construction and demolition of structures. The dust, noise, and vibration will impact residents while they live within the Project site. The community will experience additional construction impacts as existing businesses are relocated, small businesses access is disrupted, and traffic circulation is stressed by construction activities. A mitigation plan must be in place if residents are to endure the impacts of this heavy construction.

Truck trips generated during the peak a.m. traffic hours are not addressed within the proposed mitigation measures. Morning truck trips will create as much additional congestion for Boyle Heights residents trying to drop their kids off for school or get to work on time as they will for residents trying to get home. To address these concerns, construction hours should be limited to 9:00 a.m. until 3:00 p.m. daily, and truck trips and construction impacts should be avoided and, at the least, minimized during both the a.m. and p.m. peak commuting hours to accommodate the community during the 15 year build out period of the Project.

In addition, the Developers should work with LAUSD School Officials to minimize any construction and / or operational impacts to nearby schools during peak periods.

#### **4. Pedestrian Circulation**

The Developer needs to pay special attention to issues related to circulation and pedestrian passageways. Items like enhanced crosswalks, pedestrian level street lighting, wider sidewalks, bulb-outs and other traffic calming measures should be implemented. Boyle Heights' residents are largely transit-dependent and any new development should include mitigations and amenities that support and protect pedestrian circulation.

#### **5. Traffic Circulation**

The Department of Transportation's Traffic Impact Study for the Project determined that 22 intersections (15 within the City of Los Angeles) would be significantly impacted by project-related traffic. At the greatest proposed density, the Project is expected to generate over 19,640 net new daily trips once fully built out. Considering the effect this increase will have on local traffic, the proposed mitigation measures with respect to traffic circulation are inadequate.

For example, the DEIR proposes mitigation measures regarding overall and neighborhood transit system improvements, traffic signal upgrades and new signals, a transit demand management plan, transit pass subsidies, expansion of the car sharing program, and the Neighborhood Traffic Mitigation Plan. However, the area is already saturated with traffic which the local streets cannot sustain. Each day, not only will residents of the Project go to and from work/school, but there are thousands of vehicles that use Olympic Boulevard and Soto Street as major thoroughfares for neighboring communities to reach downtown Los Angeles. In fact, the Olympic/Soto intersection is considered one of the heaviest daily traveled in the City of Los Angeles.

In addition, each day there are diesel trucks coming and going from the adjacent industrial area within Los Angeles and the neighboring City of Vernon. A diesel truck takes up significantly more space than a regular vehicle and a singular daily trip as counted in the typical methodology does not accurately account for the full extent of congestion. Traffic impacts for the Project should not only be measured quantitatively, but qualitatively.

#### **6. Design Features**

Design features contributing to sustainability, such as permeable paving for example, require regular maintenance and upkeep to retain maximum utility and their ability to operate as originally envisioned. To ensure that these features continue to contribute to the site's sustainability and minimize any impact on the environment, a regular maintenance program must be a required operational program feature. In addition, the mere installation of features, such as installing plumbing for grey water use, is not

enough – a mechanism must be in place to make certain that the sustainable features the project is endowed with are fully utilized.

## **7. Signage**

The proposed signage program may not be in compliance with the City's proposed sign ordinance. The program may have heightened impacts on the local community with respect to lighting, unnecessary visual obstruction, and other impacts that are not addressed in the DEIR.

## **8. Public Amenities**

The Developers should assist in the creation of a Nexus Study to assess the impacts of the specific plan development on public infrastructure, facilities, and services. A more robust analysis is needed to ensure that civic necessities and amenities such as schools, fire stations, and other civic resources necessary for public safety and the community's welfare are appropriately provided.

## **9. Commercial Development**

None of the security measures entailed in the DEIR specifically addresses issues that may arise from the commercial and retail portions of the development. Should retail or commercial uses be developed, it is important that each have the specific types of uses like restaurants, grocery stores, and, in particular, any use that offers alcohol for sale and/or consumption to the general public be required to have a detailed and appropriate security plan in place. Boyle Heights has an over-concentration of liquor licenses. This analysis may change the types of impacts and subsequent proposed mitigations should any be required.

## **10. Retention Plan**

The City of Los Angeles has long acknowledged its lack of affordable housing and its need to retain its existing stock. At present, no affordability covenant exists, although all units are subject to the Rent Stabilization Ordinance (RSO). The Developer proposes to provide 1,200 new rental apartments, with up to 660 of these units under covenant restricting rents to rates affordable to very low- and low-income families for a period of 30 years.

The replacement of existing affordable units is required under current city codes, and we encourage the Developer to extend the covenant to all 1200 affordable units while ensuring that all present tenants who wish to remain may rent an apartment within the project at a rate no higher than the rent stabilized amount they would pay based upon their current lease.

Michael LoGrande  
Sergio Ibarra  
Boyle Heights Mixed Use Community Project DEIR

As the Retention Plan proposes that residents remain within the Project site while heavy construction and demolition occur, a mitigation plan must be in place if residents are to endure the impacts of these activities.

### **11. Financial Feasibility**

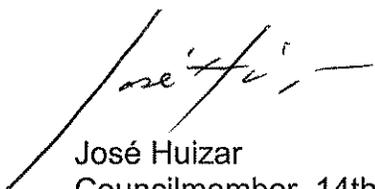
I am concerned that the economics of the project are not realistic given existing depressed market conditions. The financials list units at rates comparable to existing Downtown units, which have a high vacancy rate in this market. Accordingly, I am concerned that financially the project is infeasible and will never be built.

I am also concerned that the cost of rehabilitation referenced within the DEIR has been greatly inflated – rehabilitation costs for the Lincoln Place Apartments, another garden apartment project in Venice built in the 1940s, are about half of those listed in this DEIR. Village Green and Lincoln Place are just two examples of other garden apartment communities that have successfully addressed ways to rehabilitate their historic buildings and still provide a reasonable return on investment.

Additionally, the Developers should ensure that a demand for the level of office and retail space included within this project exists – vacant storefronts can negatively impact the greater community.

I look forward to working with community stakeholders, City Planning, and the Developers throughout this process. Please direct your staff to contact Tricia Robbins, my Planning Deputy, at (213) 473-7014 or via e-mail at [Tricia.Robbins@lacity.org](mailto:Tricia.Robbins@lacity.org) if there are any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "José Huizar", with a horizontal line extending to the right.

José Huizar  
Councilmember, 14th District

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

WILLIAM ROSCHEN  
PRESIDENT  
REGINA M. FREER  
VICE-PRESIDENT  
SEAN O. BURTON  
DIEGO CARDOSO  
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BARBARA ROMERO  
MICHAEL K. WOO  
JAMES WILLIAMS  
COMMISSION EXECUTIVE ASSISTANT II  
(213) 978-1300

CITY OF LOS ANGELES  
CALIFORNIA



ANTONIO R. VILLARAIGOSA  
MAYOR

EXECUTIVE OFFICES

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DEPUTY DIRECTOR  
(213) 978-1274  
FAX: (213) 978-1275  
INFORMATION  
[www.planning.lacity.org](http://www.planning.lacity.org)

December 19, 2011

Honorable Jose Huizar  
Councilmember, 14<sup>th</sup> District  
200 N. Spring Street, Room 465  
Los Angeles, CA 90012

**Wyvernwood / Boyle Heights Mixed-Use Community Project Draft Environmental Impact Report (EIR Case No. ENV 2008-2141 EIR) Comment Period Extension**

Dear Honorable Councilman Huizar:

On Thursday, October 20, 2011, our Department released the draft Environmental Impact Report (DEIR) for the Boyle Heights Mixed-Use Community Project with a 60-day comment period ending on December 19, 2011. We are receptive to your concerns regarding sufficient time for the public to review this extensive document for such a comprehensive project. Therefore, at your request, we will be extending the comment period for an additional 30 days until Wednesday, January 18, 2012.

Sincerely,

MICHAEL J. LOGRANDE  
Director of City Planning

ML:JF:si



Sergio Ibarra <sergio.ibarra@lacity.org>

# Boyle Heights Mixed-Use Community Project- City of Los Angeles- DEIR

1 message

Duong, Toan <TDUONG@dpw.lacounty.gov>

Tue, Dec 6, 2011 at 3:48 PM

To: sergio.ibarra@lacity.org

Cc: "Ibrahim, Amir" <AIBRAHIM@dpw.lacounty.gov>, "Yanez, Jarrett" <JYANEZ@dpw.lacounty.gov>, "Pletyak, Jeff" <JPLETY@dpw.lacounty.gov>

Mr. Ibarra,

## BOYLE HEIGHTS MIXED-USE COMMUNITY PROJECT

### DRAFT ENVIRONMENTAL IMPACT REPORT (OCTOBER 2011)

#### CITY OF LOS ANGELES

The Los Angeles County Department of Public Works (DPW) has reviewed the Draft Environmental Impact Report (DEIR) for the proposed Boyle Heights Mixed-Use Community project located in the City of Los Angeles. We offer the following comments:

#### 1. TRAFFIC

We generally agree with the findings in the DEIR that the proposed project will have a significant impact at the County intersections listed below.

##### Indiana Street at Olympic Boulevard

Although we concur with the DEIR's findings that the project will have a significant impact, we disagree with the DEIR that the County is not requiring mitigation for this intersection. Under the County's guidelines, the project is solely responsible for mitigating significant impacts at County intersections resulting from trips generated by the project alone.

Although the DEIR does not provide specific capacity-enhancement improvements to mitigate its impact, we generally support the proposed Travel Demand Management (TDM) program and transit system improvements to reduce the number of trips generated by the project.

##### Downey Road at Bandini Boulevard

We concur with the proposed mitigation measure to add a second eastbound left-turn lane and modify the signal phasing to operate the eastbound and westbound left-turns as lead/lag phasing to avoid truck left-turn conflicts. Detailed striping and signal plans for these improvements shall be submitted to DPW-Traffic and Lighting Division for review and approval.

If you have any questions regarding the traffic comments, please contact Mr. Virgilio (Gil) Lazatin of our Traffic Studies Section at (626) 300-4721.

#### 2. SOILS/GEOLOGY

An update to the soils reports dated June 10, 2008 may be required. The seismic design parameters may need to be updated for the latest building code.

If you have any questions regarding the soils/geology, please contact Mr. Jeremy Wan at (626) 458-4725.

Please contact me if you have any other question or comments. Thank you.

Toan Duong

Land Development Division

Los Angeles County Department of Public Works

(626) 458-4945

[tduong@dpw.lacounty.gov](mailto:tduong@dpw.lacounty.gov)

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**Letter No. 9**

Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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## Boyle Heights Mixed-Use Community Project EIR

1 message

**Hartwell, Scott <HARTWELLS@metro.net>****Mon, Dec 19, 2011 at 2:05 PM**

To: "sergio.ibarra@lacity.org" &lt;sergio.ibarra@lacity.org&gt;

Cc: "Yee, Durwood (Woody)" &lt;YEEW@metro.net&gt;, "Serdienis, Pete" &lt;SerdienisP@metro.net&gt;, "Page, Scott" &lt;PAGES@metro.net&gt;, "Alameida, Stacy" &lt;AlameidaS@metro.net&gt;

Mr. Ibarra,

Attached is MTA's response to the Boyle Heights Mixed-Use Community Project Draft EIR. A hard copy will arrive via U.S. Mail as well.

Thanks,

**Scott Hartwell**

Transportation Planner

One Gateway Plaza mailstop 99-23-2

Los Angeles, CA 90012

(213)922-2836

**Boyle Heights Mixed-Use Community Project EIR Response.pdf**

108K



# Metro

December 19, 2011

Mr. Sergio Ibarra  
City of Los Angeles, Major Projects  
200 N. Spring St., City Hall, Room 750  
Los Angeles, CA 90012

Dear Mr. Ibarra

The Los Angeles County Metropolitan Transportation Authority (LACMTA) is in receipt of the Draft Environmental Impact Report (DEIR) for the Boyle Heights Mixed-Use Community Project. This letter conveys recommendations from MTA concerning issues in relation to the proposed project:

Existing Metro bus passenger activity in the vicinity of the proposed project is significant, particularly along the 8<sup>th</sup> Street corridor. Therefore, Metro bus stops should be maintained along each side of the project even if temporary relocation is required in the interest of project construction, (bus) equipment and passenger safety. The developer and/or contractor should contact MTA's Special Events desk at 213-922-4632 to coordinate.

MTA looks forward to reviewing the Final EIR. If you have any questions regarding this response, please call me at 213-922-2836 or by email at [hartwells@metro.net](mailto:hartwells@metro.net). Please send the Final EIR to the following address:

MTA CEQA Review Coordination  
One Gateway Plaza MS 99-23-2  
Los Angeles, CA 90012-2952  
Attn: Scott Hartwell

Sincerely,

Scott Hartwell  
CEQA Review Coordinator, Long Range Planning



Sergio Ibarra <sergio.ibarra@lacity.org>

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## Comments on Boyle Heights Mixed-Use Community Project

1 message

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**Mercado, Michael** <Michael.Mercado@ladwp.com>

Mon, Dec 19, 2011 at 1:49 PM

To: "sergio.ibarra@lacity.org" <sergio.ibarra@lacity.org>

Cc: "Yannotta, James" <James.Yannotta@water.ladwp.com>, "Dailor, Thomas" <Thomas.Dailor@ladwp.com>

Good afternoon, Mr. Ibarra:

Here are some of the Los Angeles Department of Water and Power's (LADWP) comments with regard to the Draft Environmental Impact Report (DEIR) for the Boyle Heights Mixed-Use Community Project (the Project). Hard copies of this response letter will be mailed out shortly, and will contain additional comments generated from a more thorough review of the document.

Sincerely,

Michael Mercado

Environmental Planning and Assessment

213-367-0395

[michael.mercado@ladwp.com](mailto:michael.mercado@ladwp.com)

Re: LADWP Comments on Boyle Heights Mixed-Use Community Project

Draft Environmental Impact Report, ENV-2008-2141-EIR

State Clearinghouse No. 2008061123

Thank you for including the Los Angeles Department of Water and Power (LADWP) in the

environmental review process for the Boyle Heights Mixed-Use Community Project (the Project). The Project consists of a multi-use residential/commercial development. The conceptual plan includes: 4,400 residential units comprised of no less than 1,200 rental units, up to 3,200 condominium units, and 325,000 square feet of neighborhood-serving retail, office, and civic uses; a civic plaza, an expansive central park, active parks, neighborhood greens, neighborhood playgrounds, and landscaped courtyards and pathways; a total of approximately 24 acres of usable open space, including approximately 10.5 acres of privately maintained, publicly available, common useable open space and parks and approximately 13.5 acres of semi-private and private recreational amenities, such as landscaped courtyards and recreation rooms; and 18.21 acres of planted streetscape and yard areas. After having reviewed the Draft Environmental Impact Report (EIR) we would like to submit the following comments, for your consideration and incorporation into the Final EIR.

#### Water Infrastructure, Local Water Infrastructure and Operation, Water Supply

LADWP is also developing plans for a project to deliver recycled water to the downtown area, including the Boyle Heights Mixed Use Development. This project is currently in the planning phase and should be considered as a potential recycled water source for the Project.

It should also be noted that LADWP is the water purveyor for the Project. Any potential water received from a water wholesaler will require an agreement between LADWP and the water wholesaler prior to the water being distributed to the Project.

#### Water Infrastructure Improvements and Project Design Feature L.1-5

Remove "to the extent feasible". The purple pipe shall be designed and constructed to accommodate all irrigation and cooling tower demands. The feasibility of connecting to recycled water irrigation and cooling tower demands will be determined by negotiations between LADWP and the individual customers.

LADWP requests two options for environmental timeframe:

- 1) If a completed and certified EIR is needed for the Project, LADWP requests 10 years to complete and certify this EIR for our recycled water infrastructure.
- 2) LADWP has issued a Notice to Proceed for an EIR that would cover the infrastructure to reach this project before the Phase 1 Grading permit is issued in lieu of a completed and certified EIR.

We appreciate having had the opportunity to review and comment on the Draft EIR, and look forward to reviewing the Final EIR when it is available. Please continue to include LADWP in your mailing list and address it, and any questions you may have, to Mr. Michael Mercado of my staff at 213-367-0395.

-----Confidentiality Notice-----

This electronic message transmission contains information from the Los Angeles Department of Water and Power, which may be confidential. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the content of this information is prohibited. If you have received this communication in error, please notify us immediately by e-mail and delete the original message and any attachment without reading or saving in any manner.

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# A.A.SURPLUS SALES CO., INC.

2940 East Olympic Blvd.  
Los Angeles, California 90023  
E-mail: surplusking@hotmail.com  
Phone: 323-526-3622  
Fax: 323-526-3617

RECEIVED  
CITY OF LOS ANGELES

NOV 15 2011

November 12, 2011

Mr Sergio Ibarra  
City of Los Angeles, Major Projects  
200 N Spring St, City Hall, Room 750  
Los Angeles, California 90012

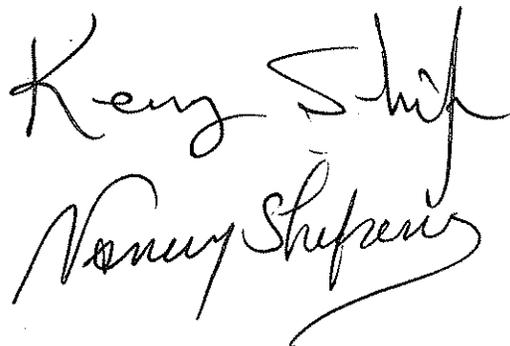
Re: Support for the Wyvernwood – Boyle Heights Mixed Use Community Project

Dear Mr Ibarra,

I am a neighbor (across the street from the current Wyvernwood Projects) of the proposed Mixed Use Community Project now opened up for discussion by the immediate community....I have been a supporter of Fifteen Group proposed development from it's inception, and have met with, and sustained MANY conversations about it's progress through the years with Mr Steve Fink...What an amazing economic engine this project will become once it is up and running!! For blocks all around the development, new retail will come in, replacing the tired older building with a entirely new look and feel...there should definitely be a ripple effect all along Olympic blvd both east and west of the development as the soon to move in residents will need goods and services apart from what will be located within the boundaries of the project...We here in the immediate vicinity of the project are waiting anxiously for the ground breaking for the development to usher in a new chapter of progress and modernity here in Boyle Heights. Mr Ibarra, you can also count on my support to aid you in any way we can to help this development succeed.

Sincerely,

Ken & Nancy Shifren Owners of AA Surplus Sales Co.

Handwritten signatures of Ken and Nancy Shifren in cursive script.



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# Letter of Support for Wyvernwood Redevelopment Project

1 message

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**Cesar Armendariz** <carmenda@usc.edu>

Fri, Dec 9, 2011 at 3:46 PM

To: Sergio.Ibarra@lacity.org

Cc: "Hector Hernandez Sr. (hector@paramountmatt.com)" <hector@paramountmatt.com>, Ralph Carmona <rcarmona@ebac-bpi.org>, Steve Fink <SFink@fifteengroup.com>

Mr. Sergio Ibarra,

Greetings. On behalf of the Boyle Heights Chamber of Commerce, please find a letter of support for the Wyvernwood redevelopment project.

Thank you,

Cesar Armendariz

President

Boyle Heights Chamber of Commerce



**BHCC - Wyvernwood Support Letter.pdf**

1200K

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December 9, 2011

Mr. Sergio Ibarra  
City of Los Angeles, Major Projects  
200 N. Spring Street, City Hall, Room 750  
Los Angeles, CA 90012

**Executive Board –  
2011-2012**

**President**

Cesar Armendariz  
*University of  
Southern California*

**Vice President**

Debbie Hoover  
*Ellis Paints*

**Treasurer**

Hector Hernandez  
*Paramount Mattress*

**Secretary**

Fidel Medina  
*KC Scott Mfg.*

**Parliamentarian**

Michael Zeledon  
*SCE Federal Credit Union*

**Advisor**

Ralph Carmona  
*Barrio Planners*

**Board of Directors –**

Fatima Djelmane  
*Proyecto Pastoral*

Oscar Lobatto  
*Advance Office*

Alicia Maldonado  
*Mockingbird  
Communications*

Victor Quiñones  
*Miguel A. Jorge, Inc.  
Tax Preparation &  
Bookkeeping Service*

Juan Romero  
*Primera Taza Coffee  
House*

Anthony Saldana  
*Excide Technologies*

Zulema Velazquez  
*State Farm Insurance*

Re: Endorsement - Boyle Heights Mixed Use Community Project

Dear Mr. Ibarra:

The Boyle Heights Chamber of Commerce is pleased to endorse the Wyvernwood redevelopment project, which will transform the Wyvernwood property with up to 4,400 new housing units, 10.5 acres of publicly available and privately maintained parks and open space, and a retail district with neighborhood-serving stores and restaurants, as well as office space. The economic impact of construction alone is estimated to be \$3.6 billion, with an additional economic impact of \$598 million each year once the project is complete.

Importantly, the project is anticipated to create more than 10,000 construction-related jobs, and an additional 2,800 permanent jobs following construction. These jobs are critically needed in our community, which has been severely affected by the lengthy economic slowdown. For this reason, we also applaud the creation of the Boyle Heights Jobs Collaborative, which will help ensure that many jobs go to local residents, with a special emphasis on Wyvernwood residents and at-risk workers. This will be a tremendous benefit for all of Boyle Heights.

The new retail and commercial district – featuring up to 300,000 square feet for new stores, restaurants and offices – will be especially welcome in our community, which will benefit from a greater variety of shopping and work destinations within walking distance for Wyvernwood residents. This district will also contribute to the estimated \$25 million in annual tax revenue to be generated by the project to support city services.

Overall, the project has been designed to be beautiful, environmentally responsible, and responsive to the needs of residents. Fifteen Group is also making meaningful commitments to current residents to ease their transition to the new development, and to welcome tenants with low and very low incomes by offering a significant number of affordable housing units.

The New Wyvernwood represents a profound improvement over the current development that will benefit all of Boyle Heights, and we strongly encourage city officials to approve it swiftly.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink that reads "Cesar Armendariz". The signature is fluid and cursive, with the first name being the most prominent.

Cesar Armendariz  
President  
Boyle Heights Chamber of Commerce



Sergio Ibarra <sergio.ibarra@lacity.org>

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## Draft EIR Comments - Boyle Heights Mixed-Use Community Project

1 message

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**Isela Gracian** <IGracian@elacc.org>

Wed, Jan 18, 2012 at 6:48 PM

To: "Sergio.Ibarra@lacity.org" <Sergio.Ibarra@lacity.org>

Cc: "Elizabeth Blaney (eblaney@uniondevecinos.org)" <eblaney@uniondevecinos.org>,

"maria@innercitystruggle.org" <maria@innercitystruggle.org>, "Jennifer Martinez (jennifer.martinez@lacity.org)" <jennifer.martinez@lacity.org>

Mr. Ibarra –

On Behalf of Comunidades Unidas de Boyle Heights (CUBH), I'm submitting our comments for Draft EIR for the Boyle Heights Mixed-Use Community Project. CUBH is a collation of local organizations made up of East LA Community Corporation, InnerCity Struggle, and Union de Vecinos representing the needs of working families and tenants in Boyle Heights.

We look forward to reviewing the revision to this draft EIR. If you have any questions or problems with the attachment please don't hesitate to contact me.

Sincerely,

**Isela C. Gracian**

Associate Director

East LA Community Corporation

530 South Boyle Avenue. Los Angeles, CA 90033

P: 323-604-1957

F: 323-261-1065

Cc: Elizabeth Blaney, Executive Director. Union de Vecinos.

Maria Brenes, Executive Director. InnerCity Struggle.

Jennifer Martiez, CD14



**CUBH Comments DEIR Boyole Heights Mixed USE 1.18.2012.pdf**

157K

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January 18, 2012

**Submitted by email**

Mr. Sergio Ibarra  
City of Los Angeles, Major Projects  
200 North Spring Street, City Hall, Room 750  
Los Angeles, CA 90012  
Email: [Sergio.Ibarra@lacity.org](mailto:Sergio.Ibarra@lacity.org)

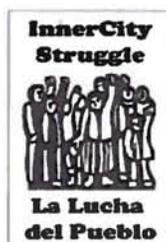
**RE: Draft EIR for the Boyle Heights Mixed-Use Community Project, ENV-2008-2141-EIR**

Dear Mr. Ibarra:

On behalf of Comunidades Unidas de Boyle Heights (CUBH) and the over 3000 Boyle Heights' constituents we represent, we thank you for the opportunity to comment on the Draft Environmental Impact Report ("DEIR") for the proposed Boyle Heights Mixed-Use Community Project ("Project"). CUBH is a coalition of local organizations made up of East LA Community Corporation, InnerCity Struggle and Union de Vecinos representing the needs of working families and tenants in Boyle Heights. The coalition came together in 2005 because of the belief that the current tenants, small businesses, and youth of Boyle Heights are the foundation for any development of our community and together can influence and shape how resources in fact improve the quality of life for everyone in Boyle Heights.

East LA Community Corporation was founded in 1995 with a mission to advocate for economic and social justice in Boyle Heights and Unincorporated East Los Angeles by building, affordable housing, grassroots leadership, self-sufficiency and access to economic development opportunities for low and moderate income families. East LA Community Corporation strengthens existing community infrastructure in underserved communities by developing and preserving neighborhood assets.

InnerCity Struggle has worked with youth, families and community residents for the past sixteen years to promote safe, healthy and non-violent communities in the Eastside. InnerCity Struggle organizes youth and families in Boyle Heights, unincorporated East Los Angeles, El Sereno and Lincoln Heights to work together for social and educational justice.



Union de Vecinos is a network of neighborhood and building communities where working families get together to SEE the conditions of their neighborhood, reflect on the root causes for these conditions and act to bring about real, concrete change. Since 1991, Union de Vecinos has been working on the tenant rights and preservation of public housing. Members of the organization work to improve Boyle Heights' housing conditions, use of public space and environmental justice.

We are writing to express our deep concern about aspects of the Project, if implemented as described would have significant impacts that are not adequately analyzed in the DEIR. Our comments will predominantly focus on the Environmental Impact Analysis – Land Use Section IV.G and the deficiencies in analysis as articulated below.

Wyvernwood Apartments is critical to the landscape of the Boyle Heights community and the City of Los Angeles overall. The Wyvernwood Apartments (“Wyvernwood”, “Wyvernwood Garden Apartments”) can and should be preserved and rehabilitated as part of the Boyle Heights Mixed-Use Community Project not completed demolished as proposed.

The proposed project would demolish and replace in whole the historic Wyvernwood Garden Apartments. The proposed project involves redevelopment of the approximately 68.8-acre site for housing and homeownership opportunities, neighborhood serving retail and office uses, civic space, greens, and open space amenities. The project would have up to 4,400 residential units with no less than 1,200 rental units and up to 3,200 condominium units and 325,000 square feet of neighborhood-serving retail, office and civic uses.

Opened in 1939 and spanning nearly seventy acres, Wyvernwood was the first large-scale garden apartment complex in Los Angeles and reportedly the largest of its kind in the country at the time. Wyvernwood remains largely intact today and is listed in the California Register of Historic Resources and has been determined eligible for the National Register of Historic Places.

## **SUMMARY**

The proposed development must occur in a way which is consistent with the California Environmental Quality Act (Public Resource Code, sections 2100, et seq. (CEQA)) and its implementing regulations (California Code of Regulations, title 14, sections 15000, et seq. CEQA Guidelines)). The Legislature intended through CEQA to “[e]nsure that the long-term protection of the environment, consistent with the provision of decent home and suitable living environment for every Californian, shall be the guiding criterion in public decisions” (Pub. Res. Code § 21101). There is two basic and connected functions of CEQA: ensuring environmental protection and encouraging governmental transparency (*Citizens of Goleta Valley v. Bd. Of Supervisors* (1990) 52 Cal 3d 553, 564).

CEQA requires full disclosure of a project’s significant environmental effects so that decision-makers and the public are informed of these consequences before the

project is approved, to ensure that government officials are held accountable for these consequences (*Laurel Heights Improvement Ass'n of San Francisco v. Regents of University of California* (1988) 47 Cal.3d 376, 392 (“*Laurel Heights*”). The environmental impact Report (EIR) process is the heart of CEQA and the primary mechanism to effectuate its statutory purposes. (*In Re Bay-Delta Programmatic EIR Coordinated Proceedings* (2008) 43 Cal. 4<sup>th</sup> 1143, 1162). An EIR is an “environmental ‘alarm bell’ whose purpose is to alert the public and its responsible officials to environmental changes before they have reached an ecological point of no return (*Laurel Heights, supra* 47 Cal. 3d at 392 (quoting *Santiago County Water Dist. v. County of Orange* (1981) 118 Cal.App. 3d 818, 822).

With an EIR the lead agency is entrusted with the responsibility of “provid[ing] public agencies and the public in general with detailed information about the effects which a proposed project is likely to have on the environment; [listing] ways in which significant effects of such project might be minimized; and [indicating] alternatives to such a project.” (Pub. Res. Code § 21061; see CEQA Guidelines § 15002, subd. (a)).

The EIR is intended “to demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action.” (14 C.C.R. § 15003 (d). Title 14, the CEQA implementing regulations). In this way, the EIR “protects not only the environment but also informed self-government.” (*Citizens of Goleta Valley, supra*, 52 Cal. 3d at 564). The EIR must not be obscure or incomplete (*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4<sup>th</sup> 412, 443). An EIR that is confusing or self-contradictory is inadequate (*San Joaquin Raptor Center v. County of Merced* (2007) 149 Cal. App. 4<sup>th</sup> 645, 656 fn.4).

There are significant and adverse impacts the proposed Project would have to the neighborhood which are not adequately represented in the DEIR. We urge the city to address inconsistencies and include a stronger alternative which involves greater preservation and rehabilitation of the Wyvernwood Garden Apartments. In addition, we urge the reconsideration of the findings of less than significant impact for the requirement of mitigation measures within section IV.G of the DEIR.

*a. The DEIR fails to accurately analyze consistency of project with General Plan Framework, Community Plan, and the SCAG RTP Compass Growth Vision*

The conclusion in the DEIR Land Use IV-G that the project is in substantial compliance is inaccurate because of critical inconsistent points used throughout the analysis. Several of the original planning principles for Wyvernwood -- pedestrian-friendly communities, communal open spaces, environmentally-sensitive siting and affordability -- have found renewed interest with smart growth and transit oriented development today, and are among the project objectives. As stated in the draft EIR, “overall, the project is intended to provide a walkable community with modern amenities and a high-quality design that promotes sustainability” (Project Description, II-17). Wyvernwood already meets these project goals with the development largely designed around modern-day sustainability principles for this reason we reiterate the request to include a stronger alternative for the preservation and rehabilitation of Wyvernwood.

*b. The Project is not compatible with the existing land-use in the area*

The project does not comply with the existing land use, compatibility of use, or compatibility of design as identified in the community plan. In the *Conclusion Regarding Land Use Consistency* on Page IV G-73 of the DEIR it states that only with the requested approvals would this project be consistent and only then would “the impacts related to the land use consistency be less than significant.” The DEIR fails to state and include in the analysis that the project has significant impacts to current land-use designation.

The DEIR also states the proposed project is compatible with surrounding development:

“The types of land uses proposed by the new project would not be out of character or otherwise incompatible with surrounding development, as the project area is currently developed with and/or zoned for the development of each types of land uses proposed by the project.” *Compatibility of Use* on page IV. G-74

The surrounding area has low to medium residential, with limited height commercial and industrial along Olympic with the only exception being the Sears Tower on the Southwest corner of Soto and Olympic. The proposed project would be compatible only with the proposed changes not with existing. The DEIR itself acknowledges the incompatibility of the use in the *Compatibility of Design* section on Page IV. G-75:

“The project would increase the density, height, and mass of on-site structures as compared to existing conditions. The project’s increased height and density would be greater than most surrounding uses, with the exception of the Sears Building located at the southwest corner of Soto Street and Olympic Boulevard.”

*c. The Project does not meet the Community Plan policy for High-Medium housing location*

The Land Use section lists a variety of goals, objectives, policies of the General Plan, Community Plan, and SCAG RTP and Compass Growth Vision which relate to having mixed-use development concentrated along rail. In all but one of the analysis did the DEIR find **Not Consistent** even though throughout the document the analysis makes the case of satisfying smart growth and transit oriented development principles by stating that the project is 1.25 miles from two MetroRail Gold Line stations. This distance is far greater than .25 mile radius set forth in the city policy for the location of High-Medium density housing (Policy 5, Page IV. G-53 in DEIR).

The Community Plan’s policy that High-Medium density housing be located within the .25 miles radius of proposed MetroRail station stops follows the General Plan Framework policy 3.7.1 which states the zoning for multi-family density will be identified in the community plan. The proposed project would have a maximum density of 64

dwellings per net acre (Analysis to Policy 3.7.1 Page IV.G-42, DEIR). Based on the Table 3-3 of the General Plan framework and the proposed maximum density the project falls into the High Medium housing characteristic and fails to be within an area where such housing is allowable by the community plan.

*d. The Project fails to analyze the negative impact on pollution*

A critical goal in the SCAG RTP and Compass Growth Vision is GV P4.3 which states “develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.” The analysis in this section continues to state the proposed projects being based on principles of smart growth. However it lacks sufficient information as to how the project would implement strategies to eliminate pollution. On the contrary, the proposed project would add to pollution, particularly the air pollution in the area based on information included in the DEIR Traffic, Access, and Parking. The project’s traffic study concluded that even with the implementation of the proposed mitigation there would be significant impacts at six study intersections at one or more peak hours.

*e. The open space is critical to existing design, calculations are inconsistent*

We concur with the Los Angeles Conservancy’s assessment on the open space for the Project:

Open space at Wyvernwood is a primary design feature and contributes to a high quality of life for residents, not equal to or less than the proposed project. The project states the quality and usability of the open spaces would be substantially improved. In fact, the opposite is the case. The project will reduce the amount, quality and usability of open space.

Throughout the Draft EIR inconsistent data is applied and discrepancies exist in regards to existing and proposed open space calculations. This lack of accuracy leads to an overall lack of confidence in the project’s analysis. For instance, Figure 11-4 of the Project Description states there is 39.98 acres of existing open space at Wyvernwood. Yet on page II-35 of the Project Description it states there is 36.43 acres of open space. Figure II-15 of the Project Description states there will be 37.25 acres of proposed open space. Yet on page II-34, the narrative adds up to 42.2 acres of proposed open space. In the Parks and Recreation section, the Draft EIR states, “In total, the project’s public and semi-private open space/recreational areas would be approximately 21.5 acres”( IV.J.4 Public Services – Parks and Recreation, IV.J-101). In the Aesthetics/Visual Quality/Views analysis, it states, “...semi-private and private courtyards, plazas, and open spaces would comprise an additional 13.5 acres of open space amenities for a total of approximately 24 acres of useable open space”( IV.A.1 Aesthetics/Visual Quality/Views, IV.A-19).

The Los Angeles Conservancy estimates that there are approximately 50 acres of existing open space at Wyvernwood and that the Project actually provides approximately 24 acres of open space. Given the inconsistent calculations throughout the Draft EIR, the amount of relatively unusable streetscape space, the total proposed building footprint acreage, and the 40

percent increase in imperviousness due to the project, any representations that open space will be more than or “substantially improved” are false (Project Description, II-34). The Final EIR should fully reevaluate its analysis and provide accurate data.

*f. The proposed project fails to meet its objective of “no net loss” of units*

One of the Project’s objectives is a no net loss of housing. Wyvernwood currently has 1,187 dwelling units all protected by the City of Los Angeles’ Rent Stabilization Ordinance (RSO). The RSO ensures affordability protections for tenants among other regulations which describe tenant and landlord responsibilities. With proposed full demolition of Wyvernwood, the City of Los Angeles and the residents loss 1,187 RSO units. Although the Project states an increase in net units it does not include information about the loss of RSO housing.

*g. No substantial findings for mitigation measures is inaccurate*

The DEIR states no substantial findings to require mitigation measures in the Land Use for the proposed project. This conclusion was reached even though the project is not consistent with the City’s policy on the location of High-Medium density housing only within .25 miles of Metro station stop and without providing adequate information on the existing land use designations. The land-use section needs to be revisited to reflect an accurate analysis with the existing land-use designations. In addition a correction to the analysis of the distance to rail because this project does not meet the intention of smart growth and transit oriented development principles. The inconsistent calculations on open space are also troubling because significant need of green open public space in the Boyle Heights neighborhood.

## **CONCLUSION**

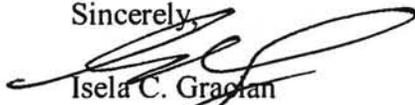
We believe that to ensure the Project meets the CEQA to it full extent a community engagement process needs to be created and implemented, not merely a “community input” process. The community engagement process needs to be more inclusive, community-driven, democratic and open decision-making in the overall development process. This can be achieved by having hearings where participants are informed about development process, land-use implications, and then given the opportunity to concretely define the design of the project.

The community input has been limited to a presentation of the project and a general “like” or “dislike” of the presentation. The community meetings on the proposed specific plan to date have been even more limited in the input process. A member of the Metro Resident Advisory put it well when Metro staff presented the issue of colors for the iron rod fencing along the Gold Line: “If you give me a choice between black and gray then I’ll choose between those. But if you ask me what is the best color for the neighborhood, that will go with the surroundings and beautify the area I’ll probably tell you brown or green.” Community engagement poses the latter question and using that as the starting point results in better planning and overall projects.

We believe the Project can provide a great opportunity to improve the quality of housing for the existing residents and surrounding neighborhood if enhanced from its existing state through a preservation and rehabilitation approach. We strongly believe that other feasible alternatives exist to make this happen while meeting many of the project objectives. However, as currently planned we remain concerned about the adverse impacts to the existing tenants and the overall neighborhood.

Once again on behalf of CUBH, Thank you for your consideration of these comments. We look forward to reviewing the revisions to this draft environmental impact report. If you have any questions, please contact me at 323-269-4214 x 232 or via e-mail at [igracian@elacc.org](mailto:igracian@elacc.org).

Sincerely,



Isela C. Gracian  
Associate Director  
East LA Community Corporation



Comité de la Esperanza

January 18, 2012

Mr. Sergio Ibarra  
City of Los Angeles, Major Projects  
200 North Spring Street, City Hall, Room 750  
Los Angeles, CA 90012  
Email: [Sergio.Ibarra@lacity.org](mailto:Sergio.Ibarra@lacity.org)

**RE: Draft EIR for the Boyle Heights Mixed-Use Community Project,  
ENV-2008-2141-EIR**

Dear Mr. Ibarra:

*El Comite de la Esperanza* (hereinafter *El Comite*). *El Comite de la Esperanza* is the oldest and largest tenant association at the Wyvernwood Development. Formed in 1984 *El Comite* has a history of service to the residents of Wyvernwood. It also has a history of activism in the community on issues of development.

*El Comite* thanks you for the opportunity to comment on the Draft Environmental Impact Report (Draft EIR) for the Boyle Heights Mixed-Use Community Project (hereinafter The Project).

Enclosed, please find the submissions of more than 1,600 residents and community representatives that oppose this project. More than 815 units from Wyvernwood Garden Apartments are opposed to this project. *El Comite* is represented by the offices of Elena Popp and our comments will be submitted via-email by Ms. Popp.

Thank you for the opportunity to allow our voices to be heard.

Sincerely,

Leonardo Lopez  
Co-founder and President of El Comite de la Esperanza



Sergio Ibarra <sergio.ibarra@lacity.org>

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## HHC comments to Draft EIR for the Boyle Heights Mixed-Use Community Project, ENV-2008-2141-EIR

1 message

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Linda Kite <lkite@healthyhomescollaborative.org>

Wed, Jan 18, 2012 at 5:10 PM

To: Sergio.Ibarra@lacity.org

Cc: Ana Cubas <ana.cubas@lacity.org>

Dear Mr. Ibarra,

Enclosed please find the comments to the Draft EIR ENV-2008-2141-EIR

Thank you,

Linda Kite

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Executive Director

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HHC letter 2 DEIR.pdf

451K

# Healthy Homes Collaborative

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BOARD MEMBER

January 18, 2012

**Submitted by email**

Mr. Sergio Ibarra  
City of Los Angeles, Major Projects  
200 North Spring Street, City Hall, Room 750  
Los Angeles, CA 90012  
Email: [Sergio.Ibarra@lacity.org](mailto:Sergio.Ibarra@lacity.org)

**RE: Draft EIR for the Boyle Heights Mixed-Use Community Project,  
ENV-2008-2141-EIR**

Dear Mr. Ibarra:

The Healthy Homes Collaborative (formerly the Lead Collaborative) has worked with *El Comite de la Esperanza* (hereinafter *El Comite*) since 1992. The Healthy Homes Collaborative is an association of community based organizations committed to eliminating environmental health threats in homes and communities. (hereinafter HHC) Linda Kite the executive director of the HHC worked closely with *El Comite* for over six years to bring about the largest Proposition 65 settlement against the previous owner Samuel Mevorach to ensure that lead hazards on the property were remediated in the 1990s.

*El Comite de la Esperanza* is the oldest and largest tenant association at the Wyvernwood Development. Formed in 1984 *El Comite* has a history of service to the residents of Wyvernwood. It also has a history of activism in the community on issues of development.

Thank you for the opportunity to comment on the Draft Environmental Impact Report (Draft EIR) the Boyle Heights Mixed-Use Community Project (hereinafter The Project). These comments are submitted in solidarity with *El Comite*.

The Healthy Homes Collaborative joins *El Comite de la Esperanza*, the Los Angeles Conservancy, East LA Community Corporation, and numerous other local community groups and residents in registering its opposition to the proposed project. The Draft EIR suffers from multiple deficiencies as articulated below. Wyvernwood can and should be preserved and rehabilitated as of the [Boyle Heights Mixed-Use Community Project](#). The proposed destruction of this historic community is ill-conceived at best.

## El Comite de la Esperanza

*El Comite de la Esperanza* is a 501(c)(3) nonprofit organization that was formed to provide social services and cultural and youth programming to the residents of the Wyvernwood community. At the height of its activities, *El Comite* had: 1) a food distribution program; 2) an emergency loan program; 3) services to families in need; 4) cultural programming related to key holidays; 5) folkloric dancing; 6) soccer tournaments (*El Mundialito*) and other youth programs. In recent years due in part to the extensive energy *El Comite* has had to put into addressing issues of displacement of its members by the Fifteen Group, *El Comite's* programming has been reduced to events during the Winter Holidays including a toy drive and *Posadas*. The soccer tournaments were terminated on threat of eviction of the key organizers by the Fifteen Group. *El Comite de la Esperanza* has participated in campaigns related to planning and development in the local area including fighting the Vernon incinerator, attending meetings regarding the re-development plans for the Sears Tower, and participating in the formation of *Union y Fuerza de la Comunidad* and its early activities in the formation of the Eastside *Adelante* Project Area Committee.

*El Comite* has also been the primary advocate for the rights of the tenants in the Wyvernwood Community in the face of harassment, draconian rule enforcement, and the Fifteen Group's efforts to displace tenants in order to circumvent the Los Angeles Rent Stabilization Ordinance.

### **The Wyvernwood Community**

The Wyvernwood Community was developed as a residential park and garden apartment complex physically arranged so as to foster a sense of community. This experiment in developing a community within a larger urban setting was a complete success as evidenced by the love and appreciation that the vast majority of the residents have for the place they call home. The arrangements of the buildings, clustered so that groups of buildings share green space which can be accessed from both front and back doors encourages neighbors to get to know each other. Children can safely play in the park-like spaces in front of or behind their homes and parents can watch their children from inside their apartments. The buildings are well constructed and remain in good condition in spite of poor maintenance practices.

The Wyvernwood Community is home to nearly 1200 households and a significantly larger number of families. An estimated 8000 people call Wyvernwood home. Most of these families are Latinos and many of them are hardworking but nonetheless low-income people. The development is subject to the Los Angeles Rent Stabilization Ordinance, an affordable housing preservation Ordinance. The Wyvernwood apartments is a significant historic resource and contributes significant amounts of green open space to the Boyle Heights Community.

Wyvernwood is a planned garden community specifically and successfully designed to foster a sense of community within an otherwise isolating urban setting. As the Department points out, the community is eligible for listing in the National Register of Historic Places under Criterion A and, therefore, is a significant historic resource.

The park-like complex of low-scale row houses and apartment buildings surrounded by expansive open space has successfully given birth to an amazing community where neighbors have primary relationships with each other. A place where neighbors are *compadres and comadres*<sup>1</sup> to each other. A community where children run and play and neighbors watch out for each other's children. A community where elderly people have a support network to age in place. Prior to the Fifteen Group's draconian practice of prohibiting gatherings, on any given Sunday after church one could wonder the common areas and find families BBQing in front of their open doors, neighbors *conviviendo* with each other. The demolition of the Wyvernwood Community results in the destruction of a significant historic resource i.e. the structures themselves. It also destroys an amazing cultural resource, i.e. a successful experiment in community building within an urban context.

### **General Comments Regarding the Project**

The Boyle Heights Mixed-Use Community Project is ill-conceived. It attempts to unwisely convert a residential land to „mixed use’ while more than quadrupling the existing density. The Project

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<sup>1</sup> Godparents to each other's children.

is described as a „walkable community’ with a design that „promotes sustainability’ while doing exactly the opposite. Notably, the best design that will promote sustainability is the absence of this project, and its absence is the best design to protect the aesthetics, noise, air and water quality, and historic resources from the disastrous effects of this Project.

Tell-tale signs of a project that is unwise in its vision include: the necessity of amending the General Plan, in this case from Low Medium II Residential to Medium Residential and Regional Center. Even more telling of the disastrous impact the Project will have on the community is the further need to revise the Medium Residential land use designation *itself* in order for the Project to comply.

### **Aesthetics/Visual Quality/Views (Draft EIR Section IV)**

In its EIR Scoping Document the City of Los Angeles identified that the Project would have a) a substantial adverse effect on a scenic vista; c) substantially degrade the existing visual character or quality of the site and its surroundings; and d) create a new source of substantial light or glare which could adversely affect day or nighttime views in the area. The EIR, after describing the construction of buildings ranging in two stories to twenty four stories in height,<sup>2</sup> concludes that there will be no significant impact to the community. The data presented contradicts the conclusion.

The final EIR must consider that the Wyvernwood Community is a beautifully designed and landscaped development with mature trees, some of which we believe to be California Oaks. The invasion of high rise buildings would result in a significant loss both to the residents and the surrounding community and will substantially degrade the visual character of the site. In making its analysis the Department must be prepared to conclude that there is no way to mitigate the impacts of a proposed development as large as this.

### **Air Quality (Draft EIR Section B)**

Under California’s historic Global Warming Solutions Act, AB 32, California has made a commitment to abate the mounting rise in global climate warming, including the goal of reducing emissions of CO<sub>2</sub> to 35% below 1990 levels. The City of Los Angeles has committed to this target goal as well, through the Green LA Action Plan. The City of Los Angeles has also approved the Green Building Ordinance to require that new buildings comply with the LEED standard. These among a host of federal, state, regional and local laws regulate new development. In this case, the Project fails to demonstrate how it achieves these target goals.

Simply because the Project states that it is based on principles of “smart growth” and “environmental sustainability” does not mitigate the fact that the razing of a large residential community to create *new* development is not sustainable (Draft EIR, Page IV.B-104). The Project attempts to calculate the emissions as significant *only if* it is equivalent or larger than 16% of the business-as-usual design, methodology or technology, based on the California Air Resources Board AB 32 Supplemental Functional Equivalent Document to the Climate Change Scoping Plan. Although the Draft EIR determines that the Project will break from the business-as-usual emissions by a 30-31% reduction, the

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<sup>2</sup> Executive summary I-10

*Mr. Sergio Ibarra*

*City of Los Angeles, Major Projects*

*Healthy Homes Collaborative's Comments to Draft EIR for the Boyle Heights Mixed-Use Community Project, ENV-2008-2141-EIR*

*January 18, 2012*

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Project still increases emissions from the existing levels by 25%. Thus, there is a net *increase* of 25% in greenhouse gas emissions that the Project would create that is unavoidable. Better alternatives could be proposed, and the Draft EIR fails to do so. The 25% increase in GHG is significant as well because greenhouse gases have a long-term consequence, unlike criteria pollutants which are estimated by daily emissions.

The Draft EIR determines construction impacts by only calculating GHG emissions, and not criteria pollutants, for on-site demolition and construction activities, off-site hauling, water usage for control of fugitive dust, and construction worker commuting (Page IV.B-108). This failure to consider criteria pollutants is a gap in the Draft EIR, which it justifies speciously by arguing for consistency with the guidance from the SCAQMD. There is no reason to avoid calculating criteria pollutants for impacts caused by the Project, other than to avoid demonstrating that in fact these impacts are significant.

The Draft EIR fails to consider the role its Project plays under the rubric set out by the Sustainable Communities Strategy, SB 375. Instead, the Draft EIR prefers to conclude that because the GHG emissions are a 30-31% reduction from business-as-usual, it has no significant impact on the environment, and this is patently not the case. Alternative measures could have been implemented to reduce the 25%*net* increase in GHG emissions that the Project will cause. As for mitigation measures, the Draft EIR summarily concludes: “with implementation of the project design features described above, impacts related to climate change would be less than significant, and no mitigation measures are recommended or required.” (Page IV.B-115) It is challenging to any scientific understanding of global climate change how the 25% increase in net GHG emissions requires no need for mitigation, and that merely the Project’s design features (use of ‘green roofs’ and lighting control systems, for example), are sufficient to obviate the need for mitigation. Again, with greenhouse gas emissions, the consequence is long-term. While it is true that CARB is in the process of establishing threshold levels, the Draft EIR attempts to exploit this fact, by arguing its reduction from the business-as-usual model makes its emissions not significant.

The South Coast Air Basin in which Los Angeles sits is one of the most polluted basins in the country. It remains out of “attainment,” or the regulatory standard set for minimum public health, for the following criteria pollutants: ozone, particulate matter, and fine particulate matter. All of these pollutants contribute to disastrous health problems, including asthma, toxification, and respiratory disease. Particulate matter because of its small size contributes to heart and lung disease and alters the body’s immune system and defenses. Although the Basin is in “attainment” for the other criteria pollutants: carbon monoxide, nitrogen dioxide, lead, sulfur dioxides and sulfate, the levels are by no means safe from a public health perspective. The levels established by the U.S. Environmental Protection Agency are the bare minimum. Due to the high volume of automobiles, vehicular travel, and the fuel combustion of these activities, Los Angeles is home to dense air pollution, and its inhabitants suffer from chronic disease as a result. Children, those with chronic disease, and the elderly are particularly vulnerable. Medical conditions related to chronic pollution are exacerbated by the particularly noxious air pollution of the Basin.

On to this preexisting landscape of dense air pollution comes now the Boyle Heights Mixed Use Community Project, which will add millions of pounds of emissions in criteria pollutants into the Basin during its construction and demolitions processes. The Draft EIR states that construction related emissions of daily and annual PM10 would exceed the SCAQMD significance thresholds and mitigation would be required. There are of course a number of other emissions that exceed regulatory thresholds,

requiring mitigation. The crux of the issue remains that this Project is unnecessary, given that a large, garden-style apartment complex, the Wyvernwood Garden Apartments, which is home to many residents, already exists on site. The demolition of this cultural and historic resource creating millions of pounds of additional emissions is unnecessary, and faulty in its vision and understanding of the City of Los Angeles' obligations under local, regional, state-wide and federal commitments and regulatory obligations to *improve* the air quality of Los Angeles, not to make it worse. Permitting the Project to go forward in fact *worsens* air quality of Los Angeles, and to the detriment of every resident of the Basin. The mitigation measures largely circulate emissions and attempt to use recycling measures as an off-set to what are blatant and clear emissions beyond the thresholds established for criteria pollutants.

Conclusion: The Project is poorly designed, and alternative measures to reduce air pollution and also retain the unique character and existing buildings of Wyvernwood have not been considered. In the current state of air pollution, combined with the forces of global climate change, the cumulative threats posed by the criteria pollutant and GHG emissions of this Project make it untenable and unwise. The Draft EIR fails to demonstrate how these twin perils have been adequately addressed.

### **Impact on Cultural Resources (Draft EIR Section IV.C)**

The proposed project would demolish and replace this historic resource. Opened in 1939 and spanning nearly seventy acres, Wyvernwood was the first large-scale garden apartment complex in Los Angeles and reportedly the largest of its kind in the country at the time. Wyvernwood remains largely intact today and is listed in the California Register of Historic Resources and has been determined eligible for the National Register of Historic Places.

The Draft EIR acknowledges the loss of Wyvernwood as a significant and unavoidable adverse impact to a cultural resource. Proposed mitigation measures -- including HABS and photo documentation-- are insufficient to reduce the impact to a less-than-significant level. Under CEQA, it is widely recognized that “[a] large historical structure [in this case, an entire historic district] once demolished, normally cannot be adequately replaced by reports and commemorative markers.”<sup>3</sup>

Wyvernwood Garden Apartments is a Nationally-Significant Historic Resource, designed originally to meet many of the project's objectives. Built between 1938 and 1941, Wyvernwood was designed by architects David J. Witmer, and Loyall F. Watson, in collaboration with landscape architect Hammond Sadler. Wyvernwood was intended to provide middle-income and worker housing located close to jobs in downtown and nearby industrial centers. The complex was privately financed by the Hostetter Estate and insured by the newly formed Federal Housing Administration (FHA). Wyvernwood served as a testing ground for the FHA's new program and a model for other garden apartments to follow, in Los Angeles and throughout the country, illustrating the modern yet affordable housing standards required of FHA-insured projects.

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<sup>3</sup> *League for Protection of Oakland's Historic Resources v. City of Oakland* (1997) 52 Cal.App.4<sup>th</sup> 896, 909.

Following progressive garden city planning principles, Wyvernwood originally consisted of 143 two-story buildings carefully arranged on six super blocks.<sup>4</sup> The super block allowed individual units to have open vistas in multiple directions. The design created intimate green spaces and courtyards, taking advantage of sunlight for passive heating, natural air for cross ventilation, and the existing topography for open space and drainage.<sup>5</sup> To foster a sense of community, all 1,102 (now 1,187) one-, two- and three-bedroom units were spread out among attached row houses and apartment blocks facing common greens, with detached garages and service areas relegated to the periphery and the rear of the blocks.

Wyvernwood was hailed as “America’s largest privately-owned community of rental homes,” widely published at the time in regional and national publications including *Architect and Engineer*, *Architectural Forum*, *Architectural Record*, and *California Arts and Architecture*. Locally, the *Los Angeles Times* featured Wyvernwood in its August 25, 1939 article, “Development Hailed Housing Achievement,” stating, “although every building is surrounded by large garden areas – well planted with beautiful trees – there is no obstruction of air and sunlight on the interiors... every dwelling has cross draft ventilation with at least two exposures and more than half have the benefit of three exposures.”

Wyvernwood is further significant as a primary example of the garden apartment movement within the United States. As already stated, at one point it was the largest example of its type. What Wyvernwood represents in physical form is a distinctly mid-20<sup>th</sup> century idea of housing, resulting from changing social ideals that called for a healthier approach to residential living. In 2007 the American Planning Association (APA) recognized the important role of garden apartments for their good design, function, sustainability, and community involvement, including an example from Pittsburgh (Chatham Village) on its listing of Great Places in America.

Wyvernwood has stood the test of time. Despite neglect and the need for reinvestment, Wyvernwood already meets a majority of the project’s guiding principles, including a “safe community; high-quality community design; meaningful, usable open space for recreational activities; and affordable housing for low and very low income families.”<sup>6</sup>

### **Hydrology and Water Quality (Draft EIR Section IV.F)**

While the DEIR refers to the City’s proposed Low Impact Development (LID) ordinance, it fails to comply with the actual ordinance, which was adopted by the City Council prior to the DEIR’s completion. (DEIR ref pg IV.F-20).

The Stormwater LID ordinance applies to all development and redevelopment in the City of LA that requires building permits within the City after the ordinance effective date, which was September 28, 2011. (LID Handbook 6/8/11, §1.5.1 p.5 reference to *LID Ordinance* (available at <http://www.lastormwater.org/siteorg/program/LID/lidintro.htm>, last checked 12/8/11) Seeing as the October 20, 2011, the date of the DEIR’s completion, falls after the ordinance’s effective date it is

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<sup>4</sup> An additional 9-10 buildings were added to Wyvernwood in the 1950s and 60s, bring the total number of apartment buildings onsite to 152 with 1,187 units (Wyvernwood Apartments – Historical Resources Technical Report)

<sup>6</sup> Project Description, II-11

Mr. Sergio Ibarra

City of Los Angeles, Major Projects

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subject to the law. The Boyle Heights Mixed-Use Community Project developers may argue that they did not have enough notice to incorporate the LID plans into the DEIR, but a quick look at the trajectory the LID ordinance will demonstrate awareness by developers and the planning community. The DEIR authors themselves right that the Board of Public Works had approved the ordinance on January 15, 2010. (DEIR pg IV.F-20) The draft Handbook was available to provide DEIR authors with guidance as of June 2011. And, the City Attorney approved the LID ordinance on August 15, 2011.

The Project is exactly the type of development that the Board of Public Works and the City Council had in mind when they adopted the ordinance. It does not fall under any of the enumerated exemptions (LID Ordinance §5 a-f) The new and redeveloped areas will alter the entire 68.8 acres of the project, which is more than fifty percent (50%) of the impervious surface of the existing site (Ibid. §2a). The site would create over 60 acres of impervious surface area, far more than the 2500 foot threshold, and within and environmentally sensitive area which drains to the L.A. River. (Ibid. §3)

As such, the Project developers were failed to create and certify a required LID Plan. (Ibid, §4) The LID Plan was supposed to be submitted along with the stormwater pollution control measures to the Department of Public Works, Bureau of Sanitation, Watershed Protection Division (WPD) for review and approval prior to submission of a DEIR to the Department of City Planning. (LID Handbook § 2.1.1, p.9)

Further, the BH Project provides a nod to the existence of LID measures, but wholly fails to adopt the purpose of the ordinance. The LID Ordinance aims to “manage and capture stormwater to the maximum extent possible”... “without any stormwater runoff leaving the site.” (LID Ordinance § 64.72 (C) 4.) In other words, the goal is to infiltrate, capture, treat and re-use most of the water that would run-off the site but for the LID features. While the BH Project developers provide design features and mitigation measures to this end, they ultimately fail to adhere to the ordinance’s purpose due to the net increase in impervious surface and stormwater runoff, as a result. As provided in the DEIR, runoff to the City storm drain would increase from 78.2 to 78.96 cfs and runoff to the County storm drain would increase from 65 cfs to 73.62 cfs. (DEIR pg IV.F-30)

Last, the Draft EIR either fails to comply or vaguely complies with the LID Ordinance metric for measuring stormwater. The LID Ordinance requires stormwater retention for at least the volume of water produced by a) the 85<sup>th</sup> percentile 24-hour runoff event...using a 48 to 72-hour draw down time as provided by the *urban Runoff Quality Management, WEF manual of Practice no. 23*, b)the volume of annual runoff based on unit basin storage water quality volume, to achieve 80 percent or more volume treatment by the method recommended in the *California Stormwater Best Management Practice Handbook* or c) the volume of runoff produced from a 0.75 inch storm event. Instead, the DEIR bases its metric for stormwater retention on the 50 year storm and event (DEIR pg IV.F-30 and Appendix G *Stantec Hydrology Study* p. 7) .

#### **Land Use (Draft EIR Section IV.G)**

The conclusion in the DEIR Land Use IV-G that the project is in substantial compliance is inaccurate because of critical inconsistent points used throughout the analysis.

The project does not comply with the existing land use, compatibility of use, or compatibility of design as identified in the community plan. In the *Conclusion Regarding Land Use Consistency* on Page IV G-73 of the DEIR it states that only with the requested approvals would this project be consistent and only then would “the impacts related to the land use consistency be less than significant.” The DEIR fails to state and include in the analysis that the project has significant impacts to current land-use designation.

The DEIR also states the proposed project is compatible with surrounding development:

“The types of land uses proposed by the new project would not be out of character or otherwise incompatible with surrounding development, as the project area is currently developed with and/or zoned for the development of each types of land uses proposed by the project.” *Compatibility of Use* on page IV. G-74

The surrounding area has low to medium residential, with limited height commercial and industrial along Olympic with the exception of the Sears Tower on the Southwest corner of Soto and Olympic. The proposed project would be compatible only with the proposed changes not with existing. The DEIR itself acknowledges the incompatibility of the use in the *Compatibility of Design* section on Page IV. G-75

“The project would increase the density, height, and mass of on-site structures as compared to existing conditions. The project’s increased height and density would be greater than most surrounding uses, with the exception of the Sears Building located at the southwest corner of Soto Street and Olympic Boulevard”

The Land Use section lists a variety of goals, objectives, policies of the General Plan, Community Plan, and SCAG RTP and Compass Growth Vision which relate to having mixed-use development concentrated along rail. In all but one of the analysis did the DEIR find **Not Consistent** even though throughout the document the analysis makes the case of satisfying smart growth and transit oriented development principles by stating that the project is 1.25 miles from two MetroRail Gold Line stations. This distance is far greater than .25 mile radius set forth in the city policy for the location of High-Medium density housing (Policy 5, Page IV. G-53 in DEIR).

The Community Plan’s policy that High-Medium density housing be located within the .25 miles radius of proposed MetroRail station stops follows the General Plan Framework policy 3.7.1 which states the zoning for multi-family density will be identified in the community plan. The proposed project would have a maximum density of 64 dwellings per net acre (Analysis to Policy 3.7.1 Page IV.G-42, DEIR). Based on the Table 3-3 of the General Plan framework and the proposed maximum density the project falls into the High Medium housing characteristic and fails to be within an area where such housing is allowable by the community plan.

A critical goal in the SCAG RTP and Compass Growth Vision is GV P4.3 which states “develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.” The analysis in this section continues to state the proposed projects being based on principles of smart growth. However it lacks sufficient information as to how the project would implement strategies to eliminate pollution. On the contrary, the proposed project would add to pollution, particularly the air pollution in the area based on information included in

the DEIR Traffic, Access, and Parking. The project's traffic study concluded that even with the implementation of the proposed mitigation there would be significant impacts at six study intersections at one or more peak hours.

Open space at Wyvernwood is a primary design feature and contributes to a high quality of life for residents, not equal to or less than the proposed project. The project states the quality and usability of the open spaces would be substantially improved. In fact, the opposite is the case. The project will reduce the amount, quality and usability of open space.

Wyvernwood's innovative approach toward urban planning and open space design is one of the features that makes the Wyvernwood community unique and significant as a historic district. The property's extensive landscaping, mature trees, and flowing green space are integral to the garden city philosophy. Designers called for the separation of pedestrian and vehicular circulation, with few through roads so as to create safe play areas and recreational spaces away from traffic. Provisions were made for cars -- then a burgeoning form of transportation -- through a carefully-planned approach of limiting their impact and alternative to a more traditional pattern of development.

Several of the original planning principles for Wyvernwood -- pedestrian-friendly communities, communal open spaces, environmentally-sensitive siting and affordability -- have found renewed interest in New Urbanism and the green building movements today, and are among the project objectives. As stated in the draft EIR, "overall, the project is intended to provide a walkable community with modern amenities and a high-quality design that promotes sustainability."<sup>7</sup> Wyvernwood already meets these project goals with the development largely designed around modern-day sustainability principles.

A primary example of this is the central Mall, designed around an existing natural ravine on site, serving as a 40-foot-wide swale to absorb and channel storm water. Today the swale functions much as it was originally intended and forms the spine of Wyvernwood's 80-foot wide central landscaped mall, the east/west axis by which the overall development was subsequently arranged. The DEIR states "...conditions provide poor water penetration into the soil, resulting in pooling and standing water [and] parts of the Mall are prone to flooding where it does not drain adequately."<sup>8</sup> Analysis within the DEIR acknowledges the majority of storm water areas at Wyvernwood drain directly to catch basins currently onsite, further stating, "No system deficiencies or incidents of flooding have been noted."<sup>9</sup> While deferred maintenance and evasive tree roots have limited the effectiveness of the central drainage channel over time,<sup>10</sup> cost-effective remedies can be easily employed to repair this feature to optimal performance and address these perceived deficiencies.

Throughout the Draft EIR inconsistent data is applied and discrepancies exist in regards to existing and proposed open space calculations. This lack of accuracy leads to an overall lack of confidence in the project's analysis. For instance, Figure 11-4 of the Project Description states there is 39.98 acres of existing open space at Wyvernwood. Yet on page II-35 of the Project Description it states there is 36.43 acres of open space. Figure II-15 of the Project Description states there will be 37.25 acres of proposed

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<sup>7</sup> Project Description, II-17

<sup>8</sup> IV. Environmental Impact Analysis, IV.J-90, 91

<sup>9</sup> Hydrology Study, page 8, Section IV

<sup>10</sup> IV. Environmental Impact Analysis, IV.J-91

open space. Yet on page II-34, the narrative adds up to 42.2 acres of proposed open space. In the Parks and Recreation section, the Draft EIR states, "In total, the project's public and semi-private open space/recreational areas would be approximately 21.5 acres."<sup>11</sup> In the Aesthetics/Visual Quality/Views analysis, it states, "...semi-private and private courtyards, plazas, and open spaces would comprise an additional 13.5 acres of open space amenities for a total of approximately 24 acres of useable open space."<sup>12</sup>

The Los Angeles Conservancy (hereinafter the Conservancy), a group who has allied with *El Comite de la Esperanza* in analyzing the proposed project estimates that there are approximately 50 acres of existing open space at Wyvernwood. *El Comite* concurs with the Conservancy's assessment that the proposed Project actually provides approximately 24 acres of open space. Given the inconsistent calculations throughout the Draft EIR, the amount of relatively unusable streetscape space, the total proposed building footprint acreage, and the 40 percent increase in imperviousness due to the project, any representations that open space will be more than or "substantially improved" are false.<sup>13</sup> The Final EIR should fully reevaluate its analysis and provide accurate data.

#### Mitigation Measures:

The DEIR states no substantial findings to require mitigation measures in the Land Use for the proposed project. This conclusion was reached even though the project is not consistent with the City's policy on the location of High-Medium density housing only within .25 miles of Metro station stop and without providing adequate information on the existing land use designations. The land-use section needs to be revisited to reflect an accurate analysis with the existing land-use designations. In addition a correction to the analysis of the distance to rail because this project does not meet the intention of smart growth and transit oriented development principles. The inconsistent calculations on open space are also troubling because significant need of green open public space in the Boyle Heights neighborhood.

### **Noise (Draft EIR Section IV. H)**

In its EIR Scoping Document the City of Los Angeles identified that the Project would have a) a substantial adverse effect on a scenic vista; c) substantially degrade the existing visual character or quality of the site and its surroundings; and d) create a new source of substantial light or glare which could adversely affect day or nighttime views in the area. The EIR, after describing the construction of two story to twenty-four story buildings,<sup>14</sup> concludes that there will not be any significant impact. The data presented contradicts the conclusion.

### **Employment, Housing and Population (Draft EIR Section I)**

Wyvernwood is home to nearly 1200 low income households that are protected in perpetuity by the Los Angeles Rent Stabilization Ordinance. The Fifteen Group proposes the construction of 660 units (or 15% of the project total) of deed restricted affordable housing and has made an unenforceable

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<sup>11</sup> IV.J.4 Public Services – Parks and Recreation, IV.J-101

<sup>12</sup> IV.A.1 Aesthetics/Visual Quality/Views, IV.A-19

<sup>13</sup> Project Description, II-34

<sup>14</sup> Executive Summary I-10

commitment to the residents that they will be allowed to remain as tenants at their current rent controlled rents.

### **Public Services (Draft EIR Section J)**

The DEIR fails to properly analyze the Proposed Project's impacts on public services. An EIR "must contain facts and analysis, not just the agency's bare conclusions or opinion." (*Citizens of Goleta Valley, supra*, 5 Cal. 3d at 568).

#### *Police*

The DEIR's description of the police services is incomplete and conclusory, at best. The DEIR demonstrates that the crime ratio in Wyvernwood is significantly lower (almost one-third) than citywide, but fails to analyze why and how the proposed project will change this circumstance (DEIR, p. IV. J-5). There is a strong possibility that the reason for Wyvernwood's relatively low crime ratio is because this community is composed of multi-generational families who know each other and have grown old together over the past 45 years. The family bonds of this community likely have a sociological impact that results in greater respect and protection for one another. Disregarding the character of this community, the DEIR assumes that the proposed project will have no impact on the crime ratio and goes on to merely project an increase in police officers associated with the increase in population. (DEIR p. JIV. J-18). The DEIR goes on to conclude that because "the cumulative growth in the area would occur as a result of infill and/or replacement projects, crime associated with the such development would merely *replace* the crime potential associated with existing use." (*id.*, emphasis added). Because the DEIR fails to analyze the unique character of this environment, it fails to properly analyze the potentially significant impact of quadrupling the number of residential units and tripling the commercial space. It is quite possible that the proposed project's impact would dilute the existing community bonds in Wyvernwood and subject the environment to a higher crime ratio more like the rest of the city.

#### *Schools*

Whereas the DEIR provides ample statistics about existing conditions and projected conditions in schools, it fails to analyze the project features that would reduce the demand for school services. The city of Los Angeles CEQA thresholds, a determination of significance on public schools must be made on a case-by-case basis, considering the following:

- The population increase resulting from the proposed project
- The demand for school services compared to the expected level of services available
- Whether and the degree to which accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar, or other actions which would create an impact on the schools, and;
- Whether the project includes features that would reduce the demand of school services

Responding to the third factor, the DEIR describes the student density and overflow accommodations at nearby schools. As an example, the DEIR notes that Roosevelt Senior High

recently operated over-capacity and that it returned to the traditional two-semester calendar organization pursuant to LAUSD's policy. (DEIR p. IV. J-58) Despite the statistics and example, the DEIR fails to analyze the purpose for the reorganization and revisions and the impact of either on the Wyvernwood community student population. Perhaps the purpose is to reverse low-performance levels of students resulting from over-capacity and teacher- student ratio. Perhaps the reorganization and revision will not do enough to accommodate the learning environment of the project's new student population. It is unclear; we are left to conjecture about the project's response to this circumstance because no analysis is provided.

Responding to the fourth factor, the DEIR demonstrates an increase in student population by less than one-third despite a tripling of residential units (DEIR p. IV. J-62 *see Table IV. J-9 Estimated LAUSD Student Generation for Existing and Proposed Residential Uses*). Intuitively, one would expect the student population to increase proportionately with the increase in residential units. However, the DEIR fails to analyze its counter-intuitive conclusion that the student population will decline as a result of the project development.

As noted in the DEIR, the Boyle Heights Community Plan aims to encourage sustainable growth patterns and promote the unique character of each neighborhood through the provision of goals, objective and politics. (Page. IV.J-65) The character of Wyvernwood is a multi-generational one with a significant child and adolescent population. Contrary to promoting the unique character of this community, the Proposed project would considerably reduce the presence of children and adolescence thus, significantly changing the unique character.

### **Traffic. Access and Parking (Draft EIR Section K)**

Currently there are 1800 total parking spaces on site. The project will require 10,903 to 11,003 spaces under LAMC Section 12.21(a)(4). [p. IV.K-28] This is a significant increase and suggests that the overall levels of traffic that the project will generate will have a substantial impact on the area.

At least 12 intersections are currently operating at LOS E or F (unacceptable levels of service). This project will only make those intersections worse and require more construction to be able to accommodate the traffic. There are CEQA guidelines addressing impacts with regard to transportation/traffic could be used to make arguments: See p. IV.K-44. In addition, Construction traffic: 200 loads per day, generating 400 trips per day, approximately 40 trips per hour. [p. IV.K-51]. Not only will this substantially affect traffic in an already overly congested area by the East LA Interchange and where there are already hundreds of trucks passing by, it will also contribute to greater pollution in the area. Many intersections impacted by the project will also be operating at LOS E or F in the future, a problem this project only contributes to and does not help alleviate. [p. IV.K-62-64].

Most intersections will require mitigation and signals to be installed. "Project is projected to generate approximately 19,460 daily vehicle trips, including 1,933 peak-hour vehicle trips." [p.IV.K-79]

"Maximum retail scenario would generate about 6,871 daily transit person trips, including approximately 512 a.m. peak-hour trips and 676 p.m. peak-hour trips." [p. IV.K-86]

The amount of vehicle and transit trips makes the EIA's conclusions that traffic impact would be insignificant suspect. The amount of generated trips is substantial and the project will have a significant impact on traffic and transit ridership. The EIA states that there would be no significant impact on transit, however the EIA at the same time calls for more buses to be added to the line that serves the area, which will require cooperation of Metro. [p. IV.K-99]

Important to note that the project promises \$200,000 for mitigation measures, but "failure to deliver a quorum for two consecutive meetings duly called and approved by the Committee shall constitute a declaration of non-interest in the process and the process shall cease, and all unused funds allocated to that neighborhood shall be returned to the Applicant or its successors." [p. IV.K-103-104]. Table N.K-19 depicts change from recommended mitigation measures, which appear to be insignificant, with most intersections remaining at a LOS E or F level, which is considered an unacceptable level of service. [p. IV.K-107]

### Utilities and Service Systems (Draft EIR Section L)

*Water Supply:* To meet its legal burden under CEQA, the water supply section of a DEIR must meet the standards set forth by the California Supreme Court in *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova*, 40 Cal.4<sup>th</sup> 412, 430-32 (2007):

- (1) Decision makers must be presented with sufficient facts to evaluate the pros and cons of supplying the amount of water that the project will need;
- (2) Future water supplies identified and analyzed must bear a likelihood of actually proving available; speculative sources and unrealistic allocations („paper water“) are insufficient bases for decision-making under CEQA. An EIR for the land use project must address the impacts of *likely* future water sources, and the EIR's discussion must include a reasoned analysis of the circumstances affecting the likelihood of the water's availability;
- (3) If it is "impossible to confidently determine that anticipated future water sources will be available, CEQA requires some discussion of possible replacement sources or alternatives to use of the anticipated water, and of the environmental consequences of those contingencies."

The DEIR Provides Decision Makers with Insufficient Facts to Evaluate Supplying Water to Project: The DEIR starts out putting the cart before the horse by assuming there will be adequate water to meet the Project's demand without sufficient facts to evaluate whether supply will be available. (DEIR, pp. IV.L-46 & 50) Under California law, a WSA is an informational document prepared by a water supplier, at the request of the local agency. (See Cal. Water Code §10910; see also *California Water Impact Network v. Newhall Ranch Water District* (2008) 161 Cal.App.4th 1464, 1487-88) [The lead agency has a separate (from the water provider's WSA) and independent responsibility to assess the sufficiency of water supplies for the proposed project.] After receiving the WSA, the local agency may include it in the EIR, but the local agency is required to make an independent decision, based on the entire record, whether projected water supplies will be sufficient to satisfy the demands of the project, in addition to existing and planned future uses. (Cal. Water Code §10911(c); see also *CWIN, supra*, 161 Cal.App.4th at 1487) [The power to „evaluate“ WSA necessarily invests the lead agency with the authority to consider, assess and examine the quality of the information in the WSA and endows the lead agency with the right to pass judgment upon the WSA. While the lead agency must

include the WSA in the EIR, the lead agency is not required to accept the WSA's conclusions. The lead agency may in evaluating the WSA accept or disagree with the water provider's analysis or may request additional information from the water provider. In any event, the lead agency is required by statute to make the ultimate determination, based on the entire record, whether water supplies are sufficient.])

The DEIR knowingly adopts Los Angeles Department of Water & Power's (LADWP) underestimates of water demand written into its Water Supply Assessment (WSA). The WSA's demand analysis bases existing and projected demand on prescribed water use rates, rather than billing records. This error fails to account for higher than average occupancy or infrastructural compromises such as leaks. Though the DEIR corrects this problem by estimating demand on billing data, the DEIR authors ultimately rely on the WSA's demand estimates which are 31% lower. (DEIR p. IV.L-25 *citing* Census data ( Sec. IV-. I. 3., Population). As a result, the DEIR skews facts about the Project's water supply needs from the outset.

Similarly, the WSA's conservation projections err in projecting demand based on prescribed water use rates further skewing facts about needed conservation. While the WSA relies on an impressive array of conservation measures, it is questionable that a project which nearly quadruples the number of dwelling units and more than doubles the square-footage of commercial and institutional space would demand little more than double the water supply. (App.M.1 p. WSA, p.8) Instead of using prescribed water rates to increased demand, authors should use a combination of current census data and historic billing rates to predict more accurate conservation potential.

The DEIR Inadequately Analyzes the Likelihood of Available Supplies and the Impacts of Uncertain Supplies on the Project, Rendering Supplies Speculative Throughout for Decision-makers: Instead of adequately analyzing the likelihood of available water supplies and the impacts of shortages on the project, the DEIR dumps, obscures, and contradicts information to avoid drawing decision makers to a conclusion that water supplies are speculative.

For instance, the DEIR dumps voluminous records about complex water supply negotiations into the text leaving it to decision makers to parse through details to surmise whether and how much water may be available. For instance, the DEIR liberally references and includes Metropolitan Water District's (MWD) entire 85-page attachment: Official Statement regarding MWD's California Water Revenue Bond (2008 Authorization). (App. M.1. App. G. p. 80). While the references and attachment provide detailed information about the scientific and legal pressures on the regional wholesalers water supply, the DEIR fails to analyze how this uncertainty will impact the Project's water supply.

First, the DEIR provides an incomplete analysis about potential shortages of imported water. The DEIR provides that "based on the hydrological models and accounting for the range of climate change scenarios and reductions associated with the Delta Smelt, average SWP deliveries from the Delta could be decreased between 66 to 69 percent of the maximum delivery amount of 4.133 MAF. The minimum annual delivery (during a single dry year) would range from 6 to 7 percent of the maximum amount allocated for delivery." (DEIR, p. IV L-47) Note how the DEIR obfuscates this analysis by first providing a decreased average amount of deliveries and then

providing an actual amount during a single dry year. Further, note that the DEIR never discusses deliveries during wet years or multiple dry years as is the norm in water supply projects.

Similarly, the DEIR fails to completely analyze how it reaches the conclusion that LADWP will draw on an average of 200,000-230,000 AF from the Los Angeles Aqueduct. (DEIR, p. IV. L-4) The DEIR provides that LADWP gets 561,000 AF from the LAA, but provides 286,000 AF to environmental mitigation and restoration programs. This leaves LADWP with 275,000 AF, which is more than twice as much as LADWP has taken from the LAA since 2007. It also leaves decision makers questioning: how does LADWP expect to draw twice as much water from the LAA?

Then, despite data on water shortage scenarios, the DEIR fails to analyze the impact of shortages on the Project's water supply. Based on the data above, a simple calculation would show that a 66-69% reduction of MWD's State Water Project (SWP) allocation (1,911,500 AF) would result in 649,900-592,565 AF divided among MWD's 26 member agencies. Because LADWP gets a preferential 21.6 percent of MWD's allocation, the reduction would result in 140,378-127,994 AF. This amount is less than LADWP has relied upon from MWD in every year recorded in Table IV.L-1, with the exception of 1998. Taking the analysis one step further, a simple calculation of 6-7% of MWD's maximum allocation would result in 114,690-133,805 AF, resulting in 24,773-28,902 AF for LADWP. In fact, LADWP has not received so little water from MWD before. Because LADWP relies so heavily on MWD imports (63.2 percent of its overall supply in 2009), an analysis of water shortages demonstrates that LADWP's water supplies may not be available to meet the Project's demand. (see Table IV. L-1, p.IV.L-2)

Next the DEIR provides contradictory information regarding reliable climate change data on major supply areas like the SWP. An EIR that contains statements that are "at best confusing and at worse self-contradictory" on key issues is inadequate." ( *San Joaquin Raptor Center, supra*, 149 Cal. App. at 656 fn. 4) First, the DEIR cites to the Department of Water Resource's, "2007 State Water Project Delivery Reliability Report," which provides that "depending on the climate change conditions, average yearly SWP Table A deliveries in 2027 would be reduced by 31 to 34 percent." (DEIR, p. IV.L-22 see summary of attached 2007 Report provided by LAFCO) This report was published on August 28, 2008, which was more than three years before release of this DEIR. Then the DEIR cites to an earlier 2007 Los Angeles Superior Court decision regarding a 2005 case (*California Oak Foundation*) wherein the court finds that the "City is in no better position [than DWR] to quantify the effects of global warming on the reliability of SWP water and that it is not required to do so under CEQA."(DEIR, p. IV.L-54, FN31) In short, the DEIR provides contradictory information so as to deny the current state-held understanding that global warming will impact water supplies and water agencies can begin to quantify its effects on the reliability of that supply.

The DEIR Fails to Adequately Discuss Replacement Sources or Alternatives to Use of Anticipated Water: Like the numerous WSA's issued by LADWP between May 2008 and May 2010, this WSA is based on outdated and inconsistent information about replacement or alternative water supplies. The WSA relies heavily on the Mayor's "Securing L.A.'s Water Supply Plan" to show that LADWP could meet all new demand for water due to projected population growth through a combination of water conservation and water recycling." ( DEIR p. IV. L-48) However, on May 17, 2010, shortly after the WSA was approved, the LADWP Board

approved revisions to the water supply reliability initiatives outlined in the Mayor's Plan. Staff recommended the Board defer water supply reliability projects such as increasing water conservation, increasing water recycling, enhancing stormwater capture, cleaning-up San Fernando Groundwater Basin, and developing additional groundwater storage. Because the deferred projects are the ones relied upon in the Mayor's Plan, the DEIR cannot continue to rely on these replacement sources to offset the Project's reliance on other speculative supplies. To the contrary, because LADWP issued numerous WSAs relying on these deferred projects, their WSA approvals will cause an even greater strain on imported supplies as projects are implemented. The DEIR should have corrected for this oversight and acknowledged that replacement supplies are speculative as well.

Though the DEIR plainly characterizes some replacement sources as speculative it fails to provide alternatives. Twice, the DEIR refers to Central Basin Municipal Water District's (CBMWD) thwarted water recycling plan as an alternative supply. First, the DEIR explains that "due the economic feasibility of the second phase of planned construction, CBMWD has *suspended* its design and construction efforts required to complete the [Southeast Water Reliability Project]..." ( DEIR p. IV. L-28, *emphasis included*) Next, in the "Project Impacts" section of the DEIR, the language provides that "Since the proposed project cannot on its own satisfy the customer demand threshold for economic feasibility, the proposed project is not assured of access to recycled water." ( DEIR p. IV. L-48) Because the DEIR fails to provide information about how CBMWD will overcome the obstacles to getting its project funded and constructed or alternative to this project, the Lead Agency has little reason to deduce that replacement sources are available.

*Wastewater Analysis:* The DEIR fails to adequately address the impacts of the additional construction while simultaneously still meeting the needs of the tenants and the site as a whole. The DEIR use of LADWP's billing records to find that 354,550 gpd of wastewater was generated states that this high gpd number is likely associated with inefficiencies such as antiquated toilets and leakages. (DEIR, IV.L-63) Yet the report is unclear as to if any of the plumbing would be addressed other than when the units are demolished. This would possibly leave plumbing problems to continue through 2030 – the site's end completion date. Faulty plumbing could potentially worsen problems such as flooding and in general continue to create inefficiencies that are unaddressed in the DEIR. It is also worth noting that the DEIR is devoid of any mention of the history of wastewater problems the site has experienced due to lack of adequate maintenance.

Furthermore, the DEIR does not adequately analyze the impacts of wastewater discharge on the antiquated facilities during construction. It is unclear whether new constructed buildings will discharge and/or effect existing lines. The DEIR never discusses the creation of lateral lines. Project Design Feature L.2-3 states that "[a]ll proposed on-site sewer mainlines shall be publicly owned and located either in the public street rights-of-way or easement. The diameter of the new mainline sewers shall vary from 12 to 27 inches." (DEIR, IV.L-71) While this provides some idea that new sewer lines will be constructed, it does not provide sufficient information to determine if any older lateral lines or other mainline sewers, other than the trunk sewers, will remain operational and if these lines will be inspected and repaired if necessary.

*Solid Waste Analysis:* The DEIR's most glaring omission is the incomplete analysis of future solid waste diversion in light of the project having no on-site recycling program post-construction. The project design features state the following "Provide recycling containers on-site for the collection and storage of recyclable materials during construction." The project will also "encourage" the use of recycled content and provide tenants with a "brochure". (DEIR IV.L-103). The DEIR fails to address how encouraging and only recycling construction materials will reach the city's goals of 75% waste diversion (DEIR IV.L-100) by 2013, two years prior to the project's actual construction. The Bureau of Sanitation has a city program designed for multiple-family units in which recycling services are provided. (see [http://lacitysan.org/solid\\_resources/recycling/services/apartment.htm](http://lacitysan.org/solid_resources/recycling/services/apartment.htm)). Yet the DEIR fails to mention that the project has evaluated whether this program is available for future use.

The project itself will generate at least 9,178 extra tons of waste every year (DEIR IV. L.-107). The DEIR fails to adequately analyze the impacts on the surrounding landfills. The DEIR provides at Table IV.L-12 the list of landfills open to the City of Los Angeles and the amount of estimated capacity as of 2009. While the capacity may exist, the sites themselves may close before full capacity is attained based on the respective landfills' conditional use permits. It is a question of time not of the amount of trash the facilities will hold. The DEIR does state the problems of solid waste disposal due to shortages of in-county sites (see DEIR, IV.L-88) but then fails to properly analyze the potential of waste-by-rail. While there may be sufficient capacity at the Mesquite Regional Landfill or other out-of-county sites, the DEIR fails to address that these may be too cost-prohibitive or logistically difficult in which case they cannot be assumed to be accessible. The DEIR also states that the project's net solid waste increase would only "represent an approximate 0.39 percent increase in the City's yearly solid waste disposal quantity based on the 2009 disposal rate..." (DEIR IV.L-107). This statement is misleading. Based on the City's own efforts to decrease its solid waste output and the project's continual generation of solid waste without diversion, the project will have an increasing share of percentage of solid waste – solid waste that will continue to be unaddressed.

Lastly the DEIR does not discuss the most recent city ordinance regarding the disposal of demolition and construction materials. Ordinance 18519 was passed by the City council on December 17, 2010 and became law January 1, 2011. It amended the Los Angeles Municipal code section 66.32 to mandate that all construction and demolition waste must be first delivered to certified construction and demolition waste processing facilities – as listed by the City. There is then no DEIR analysis of the amount of waste that the project will generate with respect to the capacity of these certified demolition waste processing facilities.

## Alternatives (Draft EIR Section V)

**The Draft EIR Contains Narrowly Defined Project Objectives that Favor New Construction over Preservation:** A key policy under the California Environmental Quality Act (CEQA) is the lead agency's duty to "take all action necessary to provide the people of this state with... historic environmental qualities...and preserve for future generations...examples of major periods of California history."<sup>15</sup> To this end, CEQA "requires public agencies to deny approval of a project with significant

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<sup>15</sup> Public Resources Code §21001 (b), (c).

adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”<sup>16</sup>

Courts often refer to the EIR as “the heart” of CEQA, providing decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzing alternatives that would reduce or avoid those impacts.<sup>17</sup> The CEQA Guidelines require a range of alternatives to be considered in the EIR that would feasibly attain most of basic project objectives but would avoid or “substantially lessen” the project’s significant adverse environmental effects. The lead agency cannot merely adopt a statement of overriding considerations and approve a project with significant impacts; it must first adopt feasible alternatives and mitigation measures.<sup>18</sup>

The list of project objectives guide the development through a range of reasonable alternatives, and determines the feasibility of an alternative, but certain objectives in the Draft EIR clearly favor demolition and forecloses consideration of less harmful alternatives.

One objective specifically aims to “remove existing on-site buildings and improvements,” that the applicant claims encroach upon public water and storm drain easements. Only the easement for a water main owned by the Metropolitan Water District (MWD) is detailed in the Draft EIR. The MWD water main and easement runs north-south through the western end of Wyvernwood aligned with Orme Avenue before it was vacated for the site. However, upon development of Wyvernwood, MWD granted an easement back to the developer of Wyvernwood in May 1939 along with a right to construct and maintain one multiple dwelling building, three garage buildings, and as many driveways and sidewalks as the owner liked within the easement area. MWD retains the right to request removal of the garages, driveways and sidewalks if it is necessary to excavate, but no request from MWD to remove the improvements is included in the Draft EIR.<sup>19</sup> As for the storm drains, no easement or encroachment is mentioned in the technical reports for hydrology and storm drains, and no illustrations have been supplied as to the location of the purported easement and encroachments.

As an objective that seems to favor demolition over rehabilitation of the site, and is cited as one of only two “ongoing problems” that the Partial Preservation Alternative does not correct, the project objective to remove an unspecified number of buildings that encroach on unidentified easements precludes the preservation of Wyvernwood.

**Partial Preservation Alternative C meets most of the project objectives:** Despite project objectives that skew in favor of demolition, the Partial Preservation Alternative C is still able to partially meet most of the project objectives. Refinements to this alternative can address these concerns and further achieve more of the project objectives.

Partial Preservation Alternative C can include some amount of retail or commercial space to meet the underlying purpose of the proposed project for “mixed-use community featuring a substantial amount of new housing stock integrated with retail, office, and service uses.” More housing and civic amenities

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<sup>16</sup> *Sierra Club v. Gilroy City Council* (1990) 222 Cal. App.3d 30, 41; also see PRC §§ 21002, 21002.1.

<sup>17</sup> *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4<sup>th</sup> 1112, 1123.

<sup>18</sup> PRC §§ 21081; *Friends of Sierra Madre v. City of Sierra Madre* (2001) 25 Cal.4<sup>th</sup> 165, 185.

<sup>19</sup> Draft EIR, Appendix M.2, Domestic Water System Study by Stantec Consulting Services, Inc., p. 3 of 8.

According to this report, the reverse easement deeded by MWD is silent on requirements for the residential building.

could be incorporated in residential towers greater than the 7-story buildings proposed in this alternative, particularly along Olympic Boulevard, or within compatible infill construction with subterranean parking that replaces the (8 acres) of surface parking lots currently onsite.

The Draft EIR contains representations that there is a need to improve site access for emergency vehicles. These allegations are not supported data. If there is a need to improve access, less drastic measures can be made to improve said access for. This is part of a project objective and another ongoing problem which the preservation alternative does not address. Examples of these measures include, adding street signage for Wyvernwood's interior circulation, coordination and periodic updates with the responding police and fire stations to map access routes and develop an emergency response plan, and if necessary, appropriate widening of select walkways can ensure Wyvernwood is properly protected and served.

Allegations are also made that the Wyvernwood Community is unsafe. Need crime statistics. Minor improvements like additional lighting on site and in building stairwells, new mirrors at "blind" corners, and regular maintenance of trees and landscaping may further address public service concerns about safety and security. All of these relatively simple measures could be accomplished despite. Again we note that there is no discernable increase in crime in the reporting district in which Wyvernwood is located within the Hollenbeck Community Police Station.

**The Final EIR Should Evaluate a Greater Range of Feasible Preservation Alternatives that Retain Wyvernwood's Eligibility as a Historic District:** The Draft EIR meets the bare minimum in its consideration of preservation alternatives. Only Partial Preservation Alternative C would meet many of the project objectives and still retain eligibility as a historic district. Rehabilitation Alternative B is considered a "no project" alternative, demonstrating a disingenuous approach that lacks real consideration of rehabilitation as a viable alternative. Given the scale of this project, there must be a sincere attempt to consider and evaluate a greater range of preservation alternatives within the Final EIR, and therefore reduce the significant impacts of this project. This should include alternative sites where this type of project might "substantially lessen" the impacts while also being more economically viable.

Other alternatives may be available but have not been analyzed within the Draft EIR. The recent work of an architectural studio class at Cal Poly Pomona demonstrates the range of alternatives that could be considered within the Final EIR. Seven teams of twenty-one students developed alternatives that meet many of the project objects while also retaining at least fifty percent of the existing Wyvernwood historic district. Students crafted various permutations that added new commercial uses along with infill development while retaining much of the central portion of Wyvernwood and its historic character.

*El Comite de la Esperanza* would support an alternative that increases density by 225 units with the increased density achieved by re-designing the areas where the garages are currently located to include parking, storage and newly constructed units. *El Comite de la Esperanza* would also support alternatives that place a reasonable amount of commercial, retail and civic space along Olympic Boulevard and in the portion of the property on 8<sup>th</sup> Street that was not part of the original development but was acquired by Fifteen Group and now sits vacant.

**Large-scale historic garden apartments across the nation and in Los Angeles have been successfully rehabilitated and preserved:** The DEIR repeatedly claims the rehabilitation of

Wyvernwood, in whole or partially, is financially infeasible. Analysis provided, however, does not substantiate this conclusion. *El Comite de la Esperanza* concurs with the The LA Conservancy that good faith effort has not been undertaken to seriously consider rehabilitation as a viable alternative.

Throughout the country, other large-scale garden apartment communities have been successfully preserved and rehabilitated, employing creative approaches of ownership, financing and incentives.

- In **Washington, DC, Mayfair Mansions Apartments** were rehabilitated in March 2009 through a phased project. Completed in 1946, Mayfair Mansions is a historic garden apartment community, listed on the DC and National Register of Historic Places. It is significant as one of the first designed for working- and middle-class African American residents. Originally insured through the FHA, the development includes 17 buildings and 569 housing units (409 affordable rental; 160 owner-occupied). \$48 million was invested in the rehabilitation. Owners complied with ADA requirements and the *Secretary of the Interior's Standards for Rehabilitation*, as the project used approximately \$9.6 million in federal historic tax credits, in addition to federal low-income housing tax credits. Phase one rehabilitation began in 2007 and was completed in 2009, focused on the construction of two buildings at a time. Phase two of the project, currently underway, is focused on the rehabilitation of 160 owner-occupied units, housing residents earning 60 percent or less of the area median income.
- In Los Angeles, **Lincoln Place in Venice** is currently undergoing rehabilitation, a 33-acre garden apartment complex built between 1949 and 1951. Lincoln Place is a significant example of low- and moderate-income rental housing built in Los Angeles following World War II to alleviate the severe housing shortages.<sup>20</sup> The project includes a two-phased rehabilitation of 45 buildings and 696 housing units. \$56 million is being invested in the rehabilitation. Owners are adhering to the *Secretary of the Interior's Standards for Rehabilitation*, as the project intends to use federal historic tax credits as well as Mills Act financial incentives to help offset the rehabilitation costs. The project also includes sensitive infill construction on land where 7 apartment buildings were previously demolished. The Lincoln Place Apartments offers lessons.

Throughout the country, examples like these and others demonstrate how historic garden apartment communities can be rehabilitated, upgraded on an incremental basis, and continue to provide high quality housing and be economically viable. Village Green in Baldwin Hills, although now structured as a condominium ownership, has been continuously maintained and updated with regular infrastructure improvements (site work, plumbing, electrical, roofing, HVAC, etc.) since it was opened in 1942. Village Green is similar to Wyvernwood, as it also consists of nearly 70 acres, though lower in density with approximately 700 units (in comparison to 1,187 units).

Throughout Virginia, which has the highest concentration of large-scale garden apartments in the nation, many have been successfully maintained and rehabilitated, employing creative approaches toward financing and homeownership (condo and co-op). Colonial Village, for instance, the first FHA-insured large-scale garden apartment housing project in the country, was built between 1935 and 1940. In the late 1970s, a phased development plan was approved for the 55-acre site and 245 buildings, calling for 75 percent of Colonial Village to be preserved while allowing some demolition and new construction to occur. Today Colonial Village continues to thrive and provide high-quality housing while also maintaining its eligibility as a historic district.

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<sup>20</sup> Historical Resources Technical Report, page 19, June 2011

**The estimated rehabilitation costs and financial analysis is unsubstantiated and flawed:** Under the Partial Preservation Alternative #3A, \$80 million is estimated for the construction cost to rehabilitate 83 existing buildings or 648 units, excluding site work and soft costs. No specific scope of work or detailed line item analysis is provided to explain the exorbitantly high \$124,146 per unit construction cost. When compared to Lincoln Place, which offers similar-sized units and type of construction, the estimates for Wyvernwood appear to be greatly exaggerated and skewed. For instance, per unit rehabilitation costs at Lincoln Place is estimated at \$53,000 for units rehabilitated according to the *Secretary of the Interior's Standards for Rehabilitation* (Standards), and \$70,763 for those that also include modernized kitchens and an added bath in 3-bedroom units.<sup>21</sup>

At Lincoln Place and elsewhere, rehabilitation generally involves upgrades which include improving building and site infrastructure to meet current-day demands, refurbishing interior spaces while keeping character-defining features like hardwood flooring intact, and modernizing kitchens or baths where appropriate, and to install energy- and water-saving features. Such improvements extend the service life of these well-thought-out 60 and 70 year-old buildings for many more decades, and have been previously achieved for much of Los Angeles' vast building stock from the 1910s and 1920s.

Without supporting information and documentation for the estimated rehabilitation costs, Wyvernwood's almost double per unit cost compared to Lincoln Place lacks justification. It also calls into question the accuracy of the overall rate of return and gross margins calculated in the Alternatives Financial Feasibility Report, as the development cost is based on the unsubstantiated rehabilitation costs. Furthermore, there is no analysis that demonstrates serious consideration of financial incentives such as the Federal Historic Rehabilitation Tax Credit, Low Income Housing Tax Credit or the Mills Act. Overall the arguments that rehabilitation cannot be phased, is financially viable, and would result in tenant displacement due to higher post-rehabilitation rents stem from the undefined rehabilitation costs and flawed financial analysis.

**Rehabilitation can be phased to limit tenant displacement and associated costs of relocation:** The Draft EIR acknowledges that Partial Preservation Alternative C is the environmentally superior alternative that would reduce the greatest number of project and would have the fewest significant and unavoidable impacts.<sup>22</sup> The applicant, however states this alternative would "create a new impact that would be significantly greater than the project in that it would displace the current tenant population." Resident retention and preservation is characterized as an either-or fallacy. The displacement and relocation issue is being represented as something larger and worse than it really is. The applicant cannot legitimately justify demolishing 256 buildings and obliterating history in order to address an unsubstantiated and largely manufactured issue associated with onsite tenant rehabilitation.

The applicant's consulting construction contractor<sup>23</sup> that provided the preliminary rehabilitation estimates also concluded that phasing the rehabilitation work would "increase two to three times" the estimated cost. While reasons such as the inability to negotiate volume discounts and cost escalation over time are given for the large increase, the timing, scope, and details of the potential phasing are not provided to determine whether cost savings could occur with different types of phasing schedules.

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<sup>21</sup> Historical Property Contract Program, City of Los Angeles, Lincoln Place Apartments, May 25, 2011

<sup>22</sup> V Alternatives, V-174

<sup>23</sup> Morley Builders

Further, this does not take in account the ability to accept bids for overall or phased rehabilitation work, often taken at a single point in time which can address cost containment and savings through volume discounts.

For instance, rehabilitation can occur on a unit-by-unit or building-by-building basis as vacancies occur, as has been the case at Village Green in Baldwin Hills, with the costs absorbed over several years. Alternatively, a grouping of 3-15 buildings can be rehabilitated at a time, which would allow a limited number of families to be relocated to available vacancies in existing or new units within Wyvernwood. Such scheduling could also be phased so that as each trade completes a grouping of buildings, they can move on to the next group, thereby benefiting from economies of scale and worker experience while still not requiring complete relocation of all tenants simultaneously.

Based on analysis provided and the alternatives considered, the applicant asserts that only Alternative #3D can be phased, which includes the retention and rehabilitation of 6 buildings at Wyvernwood, to be reused as a community center. Alternative #3C, which retains only 17 residential buildings and 126 units, the least amount of all the residential rehabilitation alternatives, the applicant apparently believes is too large in scale, stating, "it would not be possible to phase this scale of renovation, so all existing residents would be eligible for relocation benefits."<sup>24</sup>

The applicant states all existing units would need to be vacated at the commencement of rehabilitation work. Phasing the rehabilitation of large-scale housing developments, in Los Angeles and across the country, is not uncommon. This practice ensures an ongoing income stream while making necessary upgrades and improvements. It is unclear how Wyvernwood is unique from other developments in this respect, requiring, as the applicant states, that all aspects of rehabilitation occur within a single point in time. The assertion that Wyvernwood would require complete vacancy is a faulty assumption with no credible analysis to demonstrate this necessity. Estimating \$21,722,100<sup>25</sup> for relocation is unsubstantiated and we believe not entirely necessary, further calling into question the accuracy of the Alternatives Financial Feasibility Report.

### Other CEQA Considerations

**Rehabilitating Wyvernwood is acknowledged as the environmentally superior alternative and can be achieved while meeting the project's sustainability goals and objectives, including LEED for Existing Buildings certification:** The project seeks to attain LEED Silver certification; however, reuse of the existing historic buildings at Wyvernwood is an inherently green and sustainable practice. It is certainly not environmentally sustainable to demolish 256 existing buildings. According to the USGBC, LEED-certified existing buildings now surpass LEED-certified new construction, a trend that is expected to grow.<sup>26</sup> When a building is demolished and replaced, research demonstrates that it can take more than 30 years before any cumulative energy savings is achieved through even the most energy-efficient replacement building.<sup>27</sup>

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<sup>24</sup> Financial Feasibility of Project Alternatives Technical Report, 17, 18

<sup>25</sup> Financial Feasibility of Project Alternatives Technical Report, 26

<sup>26</sup> "Huge Growth for LEED retrofits," [www.greenbuildingpro.com](http://www.greenbuildingpro.com), December 8, 2011

<sup>27</sup> National Trust for Historic Preservation, Sustainability Program

The adverse environmental impact of building 4,400 housing units and up to 325,000 square feet of commercial/retail space is tremendous, requiring enormous expenditures of energy, materials, and non-renewable resources. Even with proposed recycling and the best case scenario, the project will generate 11 tons of solid waste per day over a period of 15 years (43,560 tons overall with project build out to 2030)<sup>28</sup> Further, in comparison to current annual operating solid waste generation at Wyvernwood, the project will result in a net 78 percent increase annually, or 9,179 tons of waste per year. Operational impacts of this project are significant, as stated in the analysis provided, and cumulatively would increase the need for waste disposal capacity at the County's unclassified landfills.

The proposed project will also have significant hydrology impacts, substantially increasing the amount of surface waters diverted to a downstream water body. Analysis within the Hydrology and Water Quality Technical Reports incorrectly calculates the percentage increase in imperviousness of the project<sup>29</sup> Instead of a 4.7 percent increase as stated, it is actually a 40 percent increase. The analysis did not include the existing imperviousness, IMP, of the Wyvernwood site, which is presently 54 percent. The proposed project will be 90 percent imperviousness.

The perceived deficiencies at Wyvernwood can be improved without full demolition and replacement. Wyvernwood could attain better performance through green operations and maintenance. In addition to an overall rehabilitation of each unit, upgrades can be made to modernize the electrical and plumbing systems and sustainability features such as low-flow water fixtures, tankless water heaters, and energy-efficient appliances and lighting can be installed. Some ground-floor apartment units can also be adapted to offer ADA-accessible units. The California Historic Building Code is available to provide code flexibility for historic buildings to achieve performance standards equivalent to current building codes while still retaining their historic integrity.

Improvements to the site can also offer an opportunity to upgrade telephone and sewer capacity. Options exist to reroute wastewater from the at-capacity Camulos trunk sewer line to the underutilized Eighth Street line. Existing sustainability features at the site should also be retained and upgraded. For instance, current technologies for bio-swales, coupled with appropriate maintenance, can improve rainwater infiltration and retention at the Mall, designed to act as a swale that uses the site's natural slope to capture, absorb, and drain water. Other improvements, including native plantings, updated irrigation systems, and proper maintenance, can repair the dead grass, dirt, standing water, and erosion that have occurred in some of the landscaped areas throughout years of ongoing neglect.

The Final EIR should fully scrutinize any claimed environmental benefits of the proposed project within a broad context. For instance, financial analysis does not appear to consider the cost savings of not demolishing 256 building or the substantial expenditure associated with regrading the entire site and associated soil export, as currently proposed. Once again, this calls into question the accuracy of the Alternatives Financial Feasibility Report.

## **Conclusion**

What ultimately results in the failure of The Project is its requirements under the California Environmental Quality Act, however, is not the proposed amendments to the General Plan, but rather the

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<sup>28</sup> Utilities and Service Systems – Solid waste, IV.L-105

<sup>29</sup> Hydrology and Water Quality Technical Reports, 9 of 13

*Mr. Sergio Ibarra*

*City of Los Angeles, Major Projects*

*Healthy Homes Collaborative's Comments to Draft EIR for the Boyle Heights Mixed-Use Community Project, ENV-2008-2141-EIR*

*January 18, 2012*

*Page 24 of 24*

failure to consider preservation alternatives that would mitigate and abate the disastrous impacts to historic resources, aesthetics, water and air quality, and the contribution of noise and solid and toxic waste to the area.

This ill-designed Project poses significant and unavoidable threats to the existing community and buildings in the land sited, that cannot be mitigated by the very merit and design of the Project. For the Project to come into implementation, it must prima facie destroy Wyvernwood Garden Apartments, a 1939 development listed as a historic district in the California Register of Historic Resources. Wyvernwood is a significant property for its historic location, as well as its role in providing affordable housing to low-income individuals and families, and for having provided a location for strong community development. Finally, the physical space of Wyvernwood itself provides significant and vast green space conducive to building inter-generational relationships and community, pedestrian-friendly walkways, and lush green space for children to play. These are unique assets, and the Project EIR fails to consider other preservation alternatives to ensure that these assets are preserved.

*El Comite de la Esperanza* is committed to identifying other potentially feasible alternatives that would meet the Project objectives without laying to waste the Wyvernwood Community.

Thank you for the opportunity to comment on the Draft EIR for the Boyle Heights Mixed-Use Community Project. Please add the Healthy Homes Collaborative and *El Comite de la Esperanza* to the notice list for this project as the environmental review process continues and feel free to contact me at [LKITE@HealthyHomesCollaborative.org](mailto:LKITE@HealthyHomesCollaborative.org) or 323/221-8320 x201 should you have any questions.

Sincerely,



LINDA KITE

Executive Director

In Solidarity with *El Comite de la Esperanza*

cc: Councilmember José Huizar, Council District 14  
Office of Historic Resources



November 21, 2011

RECEIVED  
CITY OF LOS ANGELES

DEC 02 2011

Mr. Sergio Ibarra  
City of Los Angeles, Major Projects  
200 N. Spring Street, City Hall, Room 750  
Los Angeles, CA 90012  
Sergio.ibarra@lacity.org

Re: Boyle Heights Mixed Use Community Project

Dear Mr. Ibarra:

Jovenes, Inc. was created to serve youth by providing opportunities to become integrated, active members of their communities. In recognition of the positive role that the Wyvernwood redevelopment project will play in supporting young people and communities throughout the area, we hereby offer the project our full endorsement.

The New Wyvernwood will create a better place for our young people to grow up. Improved park space will provide extensive opportunities for healthy outdoor recreation. Better lighting and visibility, along with a more extensive street network, will help make the site safer and more secure. In addition, the guarantee to set aside 15 percent of all units as designated affordable housing means that The New Wyvernwood will be home to families at a variety of income levels, including those of very limited means.

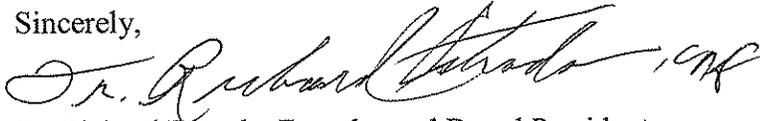
The project will also provide residents with important amenities that are currently lacking in Wyvernwood units, which are limited to one bathroom and do not provide adequate parking, sewer or electrical connections. A variety of sustainability features will ensure the project is environmentally responsible, as well.

Equally important, the Wyvernwood redevelopment project will bring critically needed jobs and investment to our community, creating more than 10,000 construction-related jobs and an additional 2,800 permanent jobs following construction. The project's dedicated local hiring program, the Boyle Heights Jobs Collaborative, will help ensure that many jobs go to local residents, with a special emphasis on Wyvernwood residents and at-risk workers. The economic impact of construction alone is estimated to be \$3.6 billion, with an additional economic impact of \$598 million each year once the project is complete.

Finally, we recognize that Fifteen Group has worked actively to collect community feedback on the plan to ensure it addresses the neighborhood's critical needs. We value and appreciate this commitment.

The Board of Jovenes, Inc. is confident this forward-looking investment will create tremendous benefits in our community – not only for Wyvernwood residents, but for all of Boyle Heights. We are proud to endorse the Wyvernwood redevelopment project, and ask that it be approved by the city as soon as possible.

Sincerely,

A handwritten signature in cursive script, reading "Fr. Richard Estrada". The signature is written in black ink and is positioned above the printed name.

Fr. Richard Estrada, Founder and Board President

Letter No. 17



Sergio Ibarra <sergio.ibarra@lacity.org>

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## Draft EIR for the Boyle Heights Mixed-Use Community Project, ENV-2008-2141-EIR

4 messages

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Adrian Fine <afine@laconservancy.org>  
To: "Sergio.Ibarra@lacity.org" <Sergio.Ibarra@lacity.org>  
Cc: Linda Dishman <ldishman@laconservancy.org>

Wed, Jan 18, 2012 at 4:39 PM

January 18, 2012

**Submitted by email**

Mr. Sergio Ibarra

City of Los Angeles, Major Projects

200 North Spring Street, City Hall, Room 750

Los Angeles, CA 90012

Email: [Sergio.Ibarra@lacity.org](mailto:Sergio.Ibarra@lacity.org)

**RE: Draft EIR for the Boyle Heights Mixed-Use Community Project, ENV-2008-2141-EIR**

Dear Mr. Ibarra:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (Draft EIR) for the Boyle Heights Mixed-Use Community Project, ENV-2008-2141-EIR.

**\*Please confirm receipt of this letter.**

Best, Adrian

**Adrian Scott Fine | Director of Advocacy | Los Angeles Conservancy**

T 213 430 4203 | F 213 623 3909 | [afine@laconservancy.org](mailto:afine@laconservancy.org)

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Get connected: Follow the Conservancy on [Twitter](#) and become a [Facebook](#) fan today!

[Join the Conservancy](#) and become an advocate for preservation in L.A. County.



**LAC Comments DEIR Boyle Heights Mixed Use 1.18.2012.pdf**  
120K

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**Sergio Ibarra <sergio.ibarra@lacity.org>**

**Wed, Jan 18, 2012 at 4:53 PM**

To: Adrian Fine <afine@laconservancy.org>

Mr. Fine,  
We have received your EIR Comment letter on time. Thank you,

Sergio

[Quoted text hidden]

--

Sergio Ibarra  
Major Projects  
200 N. Spring St. Suite 750  
Los Angeles, CA 90012  
213-978-1333  
[Sergio.Ibarra@lacity.org](mailto:Sergio.Ibarra@lacity.org)

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**Sergio Ibarra <sergio.ibarra@lacity.org>**

**Wed, Jan 18, 2012 at 5:06 PM**

To: "Eyestone-Jones, Stephanie" <s.eyestone@matrixeir.com>

Hi Stephanie,  
I'll send you the rest tomorrow!

Sergio

[Quoted text hidden]

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**Sergio Ibarra <sergio.ibarra@lacity.org>**

**Wed, Jan 18, 2012 at 5:06 PM**

To: "Eyestone-Jones, Stephanie" <s.eyestone@matrixeir.com>

[Quoted text hidden]

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January 18, 2012

**Submitted by email**

Mr. Sergio Ibarra  
City of Los Angeles, Major Projects  
200 North Spring Street, City Hall, Room 750  
Los Angeles, CA 90012  
Email: [Sergio.Ibarra@lacity.org](mailto:Sergio.Ibarra@lacity.org)

**RE: Draft EIR for the Boyle Heights Mixed-Use Community Project, ENV-2008-2141-EIR**

Dear Mr. Ibarra:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (Draft EIR) for the Boyle Heights Mixed-Use Community Project. The Los Angeles Conservancy is the largest local preservation organization in the United States, with over 6,800 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles through advocacy and education.

The proposed project would demolish and replace in whole the historic Wyvernwood Garden Apartments. Opened in 1939 and spanning nearly seventy acres, Wyvernwood was the first large-scale garden apartment complex in Los Angeles and reportedly the largest of its kind in the country at the time. Wyvernwood remains largely intact today and is listed in the California Register of Historic Resources and has been determined eligible for the National Register of Historic Places. The Los Angeles Conservancy strongly believes the Draft EIR suffers from deficiencies. Wyvernwood can and should be preserved and rehabilitated as part of the Boyle Heights Mixed-Use Community Project.

The Draft EIR acknowledges the loss of Wyvernwood as a significant and unavoidable adverse impact to a cultural resource. Proposed mitigation measures -- including HABS and photo documentation-- are insufficient to reduce the impact to a less-than-significant level. Under CEQA, it is widely recognized that “[a] large historical structure [in this case, an entire historic district] once demolished, normally cannot be adequately replaced by reports and commemorative markers.”<sup>1</sup>

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<sup>1</sup> *League for Protection of Oakland's Historic Resources v. City of Oakland* (1997) 52 Cal.App.4<sup>th</sup> 896, 909.

## **I. Wyvernwood Garden Apartments is a Nationally-Significant Historic Resource, designed originally to meet many of the new project’s objectives**

Built between 1938 and 1941, Wyvernwood was designed by architects David J. Witmer, and Loyall F. Watson, in collaboration with landscape architect Hammond Sadler. Wyvernwood was intended to provide middle-income and worker housing located close to jobs in downtown and nearby industrial centers. The complex was privately financed by the Hostetter Estate and insured by the newly formed Federal Housing Administration (FHA). Wyvernwood served as a testing ground for the FHA’s new program and a model for other garden apartments to follow, in Los Angeles and throughout the country by illustrating the modern yet affordable housing standards required of FHA-insured projects.

Following progressive garden city planning principles, Wyvernwood originally consisted of 143 two-story buildings carefully arranged on six super blocks (in total there are 256 buildings including garage structures, etc.).<sup>2</sup> The super block allowed individual units to have open vistas in multiple directions. The design creates both large and intimate green spaces and courtyards that take advantage of sunlight for passive heating, natural air for cross ventilation, and the existing topography for open space and drainage.<sup>3</sup> To foster a sense of community, all 1,102 (now 1,187) one-, two- and three-bedroom units were spread out among attached row houses and apartment blocks facing common greens, with detached garages and service areas relegated to the periphery and the rear of the units.

Wyvernwood was hailed as “America’s largest privately-owned community of rental homes,” widely published at the time in regional and national publications including *Architect and Engineer*, *Architectural Forum*, *Architectural Record*, and *California Arts and Architecture*. Locally, the *Los Angeles Times* featured Wyvernwood in its August 25, 1939 article, “Development Hailed Housing Achievement,” stating, “although every building is surrounded by large garden areas – well planted with beautiful trees – there is no obstruction of air and sunlight on the interiors... every dwelling has cross draft ventilation with at least two exposures and more than half have the benefit of three exposures.”

Wyvernwood is further significant as a primary example of the garden apartment movement within the United States. As already stated, at one point it was the largest example of its type. What Wyvernwood represents in physical form is a distinctly mid-20<sup>th</sup> century idea of housing, resulting from changing social ideals that called for a healthier approach to residential living. In 2007 the American Planning Association (APA) recognized the important role of garden apartments for their good design, function, sustainability, and community involvement, including an example from Pittsburgh (Chatham Village) on its listing of Great Places in America.

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<sup>2</sup> An additional 9-10 buildings were added to Wyvernwood in the 1950s and 60s, bring the total number of apartment buildings onsite to 152 with 1,187 units (Wyvernwood Apartments – Historical Resources Technical Report)

In many ways Wyvernwood has stood the test of time. Despite ongoing deterioration and the need for reinvestment, as acknowledged within the Draft EIR, Wyvernwood already meets a majority of the project's guiding principles, including a "safe community; high-quality community design; meaningful, usable open space for recreational activities; and affordable housing for low and very low income families."<sup>4</sup>

**a. Open space at Wyvernwood is a primary design feature and contributes to a high quality of life for residents.**

The proposed project states the quality and usability of the open spaces would be substantially improved. We strongly believe the opposite, that the project will in fact diminish the amount, quality and usability of open space. Wyvernwood's innovative approach toward urban planning and open space design is what makes it unique and significant as a historic district. The property's extensive landscaping, mature trees, and flowing green space are integral to the garden city philosophy. Designers called for the separation of pedestrian and vehicular circulation, with few through roads so as to create safe play areas and recreational spaces away from traffic. Provisions were made for cars - - then a burgeoning form of transportation -- through a carefully-planned approach of limiting their impact and alternative to a more traditional pattern of development.

Remarkably, several of the original planning principles for Wyvernwood -- pedestrian-friendly communities, communal open spaces, environmentally-sensitive siting and affordability -- have found renewed interest in New Urbanism and the green building movements today, and are among the project objectives. As stated in the Draft EIR, "overall, the project is intended to provide a walkable community with modern amenities and a high-quality design that promotes sustainability."<sup>5</sup> In many ways Wyvernwood already meets these project goals with the existing 1939 development largely designed around modern-day sustainability principles.

A primary example of this is the central Mall, designed around an existing natural ravine on site to serve as a 40-foot-wide swale to absorb and channel storm water. Today the swale functions much as it was originally intended and forms the spine of Wyvernwood's 80-foot wide central landscaped mall, the east/west axis by which the overall development was subsequently arranged. The DEIR states "...conditions provide poor water penetration into the soil, resulting in pooling and standing water [and] parts of the Mall are prone to flooding where it does not drain adequately."<sup>6</sup> However, analysis within the DEIR acknowledges the majority of storm water areas at Wyvernwood drain directly to catch basins currently onsite, further stating, "No system deficiencies or incidents of flooding have been noted."<sup>7</sup> While deferred maintenance and evasive tree roots may have limited the effectiveness of the central drainage channel over time,<sup>8</sup> cost-

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<sup>4</sup> Project Description, II-11

<sup>5</sup> Project Description, II-17

<sup>6</sup> IV. Environmental Impact Analysis, IV.J-90, 91

<sup>7</sup> Hydrology Study, page 8, Section IV

<sup>8</sup> IV. Environmental Impact Analysis, IV.J-91

effective remedies can be easily employed to repair this feature to optimal performance and address these perceived deficiencies.

**b. Proposed project does not provide equivalent or higher quality open space**

The Draft EIR repeatedly states the project will provide more open space than what currently exists and of higher quality. However, throughout the Draft EIR multiple discrepancies exist in regards to existing and proposed open space calculations. These inconsistencies lead to an overall lack of confidence in the project's analysis and accuracy. For instance, Figure 11-4 of the Project Description states there is currently 39.98 acres of existing open space at Wyvernwood; contradicting this data on page II-35 of the Project Description, it states there is currently 36.43 acres of open space. Figure II-15 of the Project Description states there will be 37.25 acres of proposed open space; yet on page II-34, the stated narrative calculates to 42.2 acres of proposed open space. In the Parks and Recreation section, the Draft EIR states, "In total, the project's public and semi-private open space/recreational areas would be approximately 21.5 acres."<sup>9</sup> In the Aesthetics/Visual Quality/Views analysis, it states, "...semi-private and private courtyards, plazas, and open spaces would comprise an additional 13.5 acres of open space amenities for a total of approximately 24 acres of useable open space."<sup>10</sup>

The Draft EIR divides up the overall open space into many different types and categories, which makes it difficult to assess in terms of comparison to existing open space conditions. Excluding buildings, parking lots and other hardscape surfaces, the Conservancy estimates there is approximately 50 acres of existing open space at Wyvernwood. Applying the same type of analysis and using what was provided within the Draft EIR, in comparison, the Conservancy believes the proposed project actually provides about 24 acres of open space.

Additional analysis within the Draft EIR, when properly evaluated, also does not support the claim that the project will provide greater open space than what currently exists. For instance, hydrology analysis indicates the proposed project will have significant impacts, substantially increasing the amount of surface waters diverted to a downstream water body. This is due to an increase in impervious surfaces, which again does not support statements that the proposed project would result in more open space. Analysis within the Hydrology and Water Quality Technical Reports incorrectly calculates the percentage increase in imperviousness of the project.<sup>11</sup> Instead of a 4.7 percent increase, as stated, it is actually a 40 percent increase. The analysis does not take into account the existing imperviousness (IMP) of the Wyvernwood site, which is presently 54 percent. The proposed project will increase to 90 percent imperviousness.

Given the inconsistent open space calculations throughout the Draft EIR and flawed analysis elsewhere, we do not believe it is accurate or fair to state that open space will be

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<sup>9</sup> IV.J.4 Public Services – Parks and Recreation, IV.J-101

<sup>10</sup> IV.A.1 Aesthetics/Visual Quality/Views, IV.A-19

<sup>11</sup> Hydrology and Water Quality Technical Reports, 9 of 13

increased or “substantially improved” than what currently exists on the project site.<sup>12</sup> The Final EIR should fully reevaluate its analysis and provide consistent and accurate data.

## **II. The Draft EIR Contains Narrowly Defined Project Objectives that Favor New Construction over Preservation**

A key policy under the California Environmental Quality Act (CEQA) is the lead agency’s duty to “take all action necessary to provide the people of this state with... historic environmental qualities...and preserve for future generations...examples of major periods of California history.”<sup>13</sup> To this end, CEQA “requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”<sup>14</sup>

Courts often refer to the EIR as “the heart” of CEQA, providing decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzing alternatives that would reduce or avoid those impacts.<sup>15</sup> The CEQA Guidelines require a range of alternatives to be considered in the EIR that would feasibly attain most of basic project objectives but would avoid or “substantially lessen” the project’s significant adverse environmental effects. The lead agency cannot merely adopt a statement of overriding considerations and approve a project with significant impacts; it must first adopt feasible alternatives and mitigation measures.<sup>16</sup>

The list of project objectives guide the development through a range of reasonable alternatives, and determines the feasibility of an alternative, but certain objectives in the Draft EIR clearly favor demolition and foreclose consideration of less harmful alternatives. In some instances, statements within the Draft EIR misstate project objectives, again indicating preference for new development. For instance, the applicant states its objective to feature “substantial amount of *new* housing stock.”<sup>17</sup> The objective within the Draft EIR actually as stated is to “increase the amount and quality of the housing stock.”<sup>18</sup>

One objective specifically aims to “remove existing on-site buildings and improvements,” that the applicant claims encroach upon public water and storm drain easements. As an objective that seems to favor demolition over rehabilitation of the site, and is cited as one of only two “ongoing problems” that the Partial Preservation Alternative C does not correct, the project objective to remove an unspecified number of buildings that encroach on unidentified easements is a contrivance to discourage the preservation of Wyvernwood.

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<sup>12</sup> Project Description, II-34

<sup>13</sup> Public Resources Code §21001 (b), (c).

<sup>14</sup> *Sierra Club v. Gilroy City Council* (1990) 222 Cal. App.3d 30, 41; *also see* PRC §§ 21002, 21002.1.

<sup>15</sup> *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4<sup>th</sup> 1112, 1123.

<sup>16</sup> PRC §§ 21081; *Friends of Sierra Madre v. City of Sierra Madre* (2001) 25 Cal.4<sup>th</sup> 165, 185.

<sup>17</sup> Page V-88

<sup>18</sup> Page 11-12

The California Supreme Court has explained that an EIR must avoid an artificially narrow statement of project objectives.<sup>19</sup> An objective is a goal, not the means to an end. This contrived objective should be revised to comply with CEQA by reflecting a legitimate project goal. For example, the objective could be restated as the protection or enhancement of public water and storm drain easements.

If restated, there should be supporting backup analysis as justification. Specifically only the easement for a water main owned by the Metropolitan Water District (MWD) is detailed in the Draft EIR. MWD retains the right to request removal of the garages, driveways and sidewalks if it is necessary to excavate, but no request from MWD regarding removal of the improvements or to correct encroachment on their easement is included in the Draft EIR.<sup>20</sup> As for the storm drains, no easement or encroachment is mentioned in the hydrology or storm drain technical reports and no illustrations have been supplied as to the location of the purported easement and encroachments.

Despite this stated project objective, there is no corresponding preservation alternative provided that addresses this perceived issue with the MWD easement, in terms of removing the buildings and structures which encroach upon the easement. Our understanding is this affects approximately 25 residential buildings and garage structures. Their removal could still maintain eligibility as an historic district while addressing this specific project objective. Further, this could demonstrate how Partial Preservation Alternative C comes even closer to meeting nearly all of the project objectives.

**a. Partial Preservation Alternative C partially meets most of the project objectives**

Despite project objectives that skew in favor of demolition, the Partial Preservation Alternative C is still able to partially meet most of the project objectives. Refinements to this alternative can address these concerns and further achieve more of the project objectives.

Partial Preservation Alternative C can include some amount of retail or commercial space to meet the underlying purpose of the proposed project for a “mixed-use community featuring a substantial amount of new housing stock integrated with retail, office, and service uses.” More housing and civic amenities could be incorporated in residential towers greater than the 7-story buildings proposed in this alternative, particularly along Olympic Boulevard, or within compatible infill construction with subterranean parking that replaces the approximately 8 acres of surface parking lots currently onsite.

Similarly, less drastic measures can be made to improve site access for emergency vehicles. Adding street signage for Wyvernwood’s interior circulation, coordination and periodic updates with the responding police and fire stations to map access routes and

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<sup>19</sup> *In re Bay Delta* (2008) 43 Cal.4<sup>th</sup> 1143.

<sup>20</sup> Draft EIR, Appendix M.2, Domestic Water System Study by Stantec Consulting Services, Inc., p. 3 of 8. According to this report, the reverse easement deeded by MWD is silent on requirements for the residential building.

develop an emergency response plan, and if necessary, appropriate widening of select walkways can ensure Wyvernwood is properly protected and served.

Despite a lack of discernable increase in crime statistics within the reporting district in which Wyvernwood is located (Hollenbeck Community Police Station), relatively simple measures could be accomplished to address the project objective for maximum safety. This could include minor improvements such as additional lighting on site and in building stairwells, new mirrors at “blind” corners, and regular maintenance of trees and landscaping.

### **III. The Final EIR Should Evaluate a Greater Range of Feasible Preservation Alternatives that Retain Wyvernwood’s Eligibility as a Historic District**

The Draft EIR is inadequate in its consideration of preservation alternatives. Only Partial Preservation Alternative C attempts to meet some of the project objectives and still retain eligibility as a historic district. Rehabilitation Alternative B, which does not include any new construction, is considered a “no project” alternative, demonstrating a disingenuous approach that lacks real consideration of rehabilitation as a viable alternative. Given the scale of this project, there should be a sincere attempt to consider and evaluate a greater range of preservation alternatives within the Final EIR to reduce the significant impacts of this project.

Other alternatives may be available but have not been analyzed within the Draft EIR. The recent work of an architectural studio class at Cal Poly Pomona demonstrates the range of alternatives that could be considered within the Final EIR. Seven teams of twenty-one students developed alternatives that meet many of the project objectives while also retaining at least fifty percent of the existing Wyvernwood historic district. While a fifty percent threshold is not optimal in terms of maintaining eligibility as an historic district, various teams preserved more than sixty percent by crafting various permutations that add new commercial uses along with infill development. Nearly all of the projects retain much of the central portion of Wyvernwood and its historic character.

### **IV. Large-scale historic garden apartments across the nation and in Los Angeles have been successfully rehabilitated and preserved**

The DEIR repeatedly claims the rehabilitation of Wyvernwood, in whole or partially, is financially infeasible. Analysis provided, however, does not substantiate this conclusion. The Conservancy is concerned that there has not been serious consideration of rehabilitation as a viable alternative. Throughout the country, other large-scale garden apartment communities have been successfully preserved and rehabilitated, employing creative approaches of ownership, financing and incentives.

- In **Washington, DC, Mayfair Mansions Apartments** were rehabilitated in March 2009 through a phased project. Completed in 1946, Mayfair Mansions is a historic garden apartment community, listed on the DC and National Register of Historic Places. It is significant as one of the first designed for working- and

- In Los Angeles, **Lincoln Place in Venice** is currently undergoing rehabilitation. Lincoln Place is a 33-acre garden apartment complex built between 1949 and 1951 and a significant example of moderate-income rental housing built in Los Angeles following World War II to alleviate the severe housing shortages.<sup>21</sup> Conditions here are likely much more severe in comparison to Wyvernwood however, as the complex has suffered for years of deferred maintenance and care. The project includes a two-phased rehabilitation of 45 buildings and 696 housing units. \$56 million is being invested in the total project costs. Owners are adhering to the *Secretary of the Interior's Standards for Rehabilitation*, as the project intends to use federal historic tax credits as well as Mills Act financial incentives to help offset the rehabilitation costs. The project also includes sensitive infill construction on land where 7 apartment buildings were previously demolished.
- Throughout the country, examples like these and others demonstrate how historic garden apartment communities can be rehabilitated, upgraded on an incremental basis, and continue to provide high quality housing and be economically viable. For instance, the largest garden apartment community in **Los Angeles, Park La Brea**, has successfully managed to maintain its historic buildings and character while also upgrading residences, attaining market rate rents, and doing so without completely vacating the overall complex.
- Another example is **Village Green in Baldwin Hills**, converted from rental units to condominium ownership in the 1970s, it has been continuously maintained and updated with regular infrastructure improvements (site work, plumbing, electrical, roofing, HVAC, etc.) since it was opened in 1942. Currently through a Mills Act agreement, leadership is undertaking a 10-year rehabilitation plan to improve infrastructure, all while residents remain in their homes. Village Green is similar to Wyvernwood, as it also consists of nearly 70 acres, though lower in density with 629 units (in comparison to 1,187 units).
- Throughout the **D.C.-metro area of Virginia**, which has the highest concentration of large-scale garden apartments in the nation, many have been successfully maintained and rehabilitated, employing creative approaches toward

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<sup>21</sup> Historical Resources Technical Report, page 19, June 2011

financing and homeownership (condo and co-op). **Colonial Village**, for instance, the first FHA-insured large-scale garden apartment housing project in the country, was built between 1935 and 1940. In the late 1970s, a phased development plan was approved for the 55-acre site and 245 buildings, calling for 75 percent of Colonial Village to be preserved while allowing some demolition and new construction to occur. Today Colonial Village continues to thrive and provide high-quality housing while also maintaining its eligibility as a historic district.

**a. The estimated rehabilitation costs and financial analysis is unsubstantiated and flawed**

Economic analysis within the Draft EIR is not considered paramount under CEQA. The applicant, however, relies heavily on this type of analysis to demonstrate why various alternatives are infeasible. CEQA defines feasibility as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.”<sup>22</sup> In order to prove economic infeasibility the applicant must provide specific “evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project.”<sup>23</sup>

Economic analysis appears skewed in several instances. For example, under the Partial Preservation Alternative C, \$80 million is estimated for the hard construction costs to rehabilitate 83 existing buildings or 648 units, excluding site work and soft costs. No specific scope of work or detailed line item analysis is provided to explain the exorbitantly high \$124,146 per unit construction cost. When compared to Lincoln Place, which offers similar-sized units and type of construction, the estimates for Wyvernwood appear to be much higher. For instance, per unit costs at Lincoln Place are estimated at \$53,000 for rehabilitation-only units, and \$70,763 for those that also include modernized kitchens and an added bath in 2-bedroom units.<sup>24</sup>

At Lincoln Place and elsewhere, rehabilitation generally involves upgrades which include improving building and site infrastructure to meet current-day demands, refurbishing interior spaces while keeping character-defining features like hardwood flooring intact, modernizing kitchens or baths where appropriate, and to install energy- and water-saving features. Such improvements extend the service life of these well-thought-out 60 and 70 year-old buildings for many more decades.

Without supporting information and documentation for the estimated rehabilitation costs, Wyvernwood’s almost double per unit cost comparison to Lincoln Place lacks justification. It also calls into question the accuracy of the overall rate of return and gross margins calculated in the Alternatives Financial Feasibility Report, as the development cost is based on the unsubstantiated rehabilitation costs. Despite the statement that “available financial incentives for historic preservation are accounted for in the feasibility

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<sup>22</sup> CEQA Guidelines, § 15364

<sup>23</sup> Citizens of Goleta Valley v. Board of Supervisors, (1988) 197 Cal. App. 3d 1167, 1181

<sup>24</sup> Historical Property Contract Program, City of Los Angeles, Lincoln Place Apartments, May 25, 2011

analysis,”<sup>25</sup> no available analysis demonstrates serious consideration of financial incentives such as the Federal Historic Rehabilitation Tax Credit, Low Income Housing Tax Credit, the Mills Act, or charitable tax deductions that could occur through façade and/or conservation open space easements. Further, financing that other types of affordable housing has secured, such as HUD assistance, is not addressed.

Overall the various arguments that state rehabilitation cannot be phased, is financially infeasible, and would result in tenant displacement due to higher post-rehabilitation rents, stem from the unspecific rehabilitation costs and flawed financial analysis.

**b. Rehabilitation can be phased to limit tenant displacement and associated costs of relocation**

The Draft EIR acknowledges that Partial Preservation Alternative C is the environmentally superior alternative that would have the fewest significant and unavoidable impacts.<sup>26</sup> However, the analysis states this alternative would “create a new impact that would be significantly greater than the project in that it would displace the current tenant population,” and presents resident retention and preservation as an either-or fallacy. We strongly believe the displacement and relocation issue under Partial Preservation Alternative C is being represented as more problematic than it really is, as the applicant has not demonstrated compelling analysis that supports the need to completely vacate Wyvernwood under a rehabilitation scenario.

The applicant’s consulting construction contractor<sup>27</sup> that provided the preliminary rehabilitation estimates concluded that phasing the rehabilitation work would “increase two to three times” the estimated cost. While reasons such as the inability to negotiate volume discounts and cost escalation over time are given for the large increase, the timing, scope, and details of the potential phasing are not provided to determine whether cost savings could occur with different types of phasing schedules. Further, this does not take in account the ability to accept bids for overall or phased rehabilitation work, often taken at a single point in time which can address cost containment and savings through volume discounts.

As has been the case at Village Green in Baldwin Hills, rehabilitation can occur on a unit-by-unit or building-by-building basis as vacancies occur with the costs absorbed over several years. Alternatively, a grouping of 3-15 buildings can be rehabilitated at a time, which would allow a limited number of families to be relocated to available vacancies in existing or new units within Wyvernwood. Such scheduling could also be phased so that as each trade completes a grouping of buildings, they can move on to the next group, thereby benefiting from economies of scale and worker experience while still not requiring complete relocation of all tenants simultaneously.

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<sup>25</sup> Appendix N.2, Alternatives Financial Feasibility Report, Page 2

<sup>26</sup> V Alternatives, V-174

<sup>27</sup> Morley Builders

To demonstrate the apparent threshold and scale that could support a phased rehabilitation, the applicant asserts that only Alternative #3D can be phased, which includes the retention and rehabilitation of 6 buildings at Wyvernwood, to be reused as a community center. Alternative #3C, which retains only 17 residential buildings and 126 units -- the least amount of all the residential rehabilitation alternatives -- the applicant apparently believes is too large in scale, stating, “it would not be possible to phase this scale of renovation, so all existing residents would be eligible for relocation benefits.”<sup>28</sup>

The applicant states all existing units would need to be vacated at the commencement of rehabilitation work. Phasing the rehabilitation of large-scale housing developments, in Los Angeles and across the country, is not uncommon. This practice ensures an ongoing income stream while making necessary upgrades and improvements. It is unclear how Wyvernwood is unique from other developments in this respect, requiring, as the applicant states, that all aspects of rehabilitation occur within a single point in time. The assertion that Wyvernwood would require complete vacancy is a faulty assumption with no credible analysis to demonstrate this necessity. We believe the need for relocation is unsubstantiated and estimating \$21,722,100<sup>29</sup> for relocation is not entirely necessary if there is a phased rehabilitation, further calling into question the accuracy of the Alternatives Financial Feasibility Report. We believe an onsite and phased rehabilitation is feasible and would greatly reduce the estimated costs associated with any need for limited relocation, and should be reflected within updated analysis.

**V. Rehabilitating Wyvernwood is acknowledged as the environmentally superior alternative and can be achieved while meeting the project’s sustainability goals and objectives, including LEED for Existing Buildings certification**

The project seeks to attain LEED Silver certification; however, reuse of the existing historic buildings at Wyvernwood is an inherently green and sustainable practice. It is certainly not environmentally sustainable to demolish 256 existing buildings. According to the USGBC, LEED-certified existing buildings now surpass LEED-certified new construction, a trend that is expected to grow.<sup>30</sup> When a building is demolished and replaced, research demonstrates that it can take more than 30 years before any cumulative energy savings is achieved through even the most energy-efficient replacement building.<sup>31</sup>

The adverse environmental impact of building 4,400 housing units and up to 325,000 square feet of commercial/retail space is tremendous, requiring enormous expenditures of energy, materials, and non-renewable resources. Even with proposed recycling and the best case scenario, the project will generate 11 tons of demolition and construction solid waste per day over a period of 15 years (43,560 tons overall with project build out to

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<sup>28</sup> Financial Feasibility of Project Alternatives Technical Report, 17, 18

<sup>29</sup> Financial Feasibility of Project Alternatives Technical Report, 26

<sup>30</sup> “Huge Growth for LEED retrofits,” [www.greenbuildingpro.com](http://www.greenbuildingpro.com), December 8, 2011

<sup>31</sup> National Trust for Historic Preservation, Sustainability Program

2030).<sup>32</sup> Further, in comparison to current annual operating solid waste generation at Wyvernwood, the project will result in a net 78 percent increase annually, or 9,179 tons of waste per year. Operational impacts of this project are significant, as stated in the analysis provided, and cumulatively would increase the need for waste disposal capacity at the County's unclassified landfills.

The perceived deficiencies at Wyvernwood can be improved without full demolition and replacement. Wyvernwood could attain better performance through green operations and maintenance. In addition to an overall rehabilitation of each unit, upgrades can be made to modernize the electrical and plumbing systems and sustainability features such as low-flow water fixtures, tankless water heaters, and energy-efficient appliances and lighting can be installed. Some ground-floor apartment units can also be adapted to offer ADA-accessible units. The California Historic Building Code is available to provide code flexibility for historic buildings to achieve performance standards equivalent to current building codes while still retaining their historic integrity.

Improvements to the site can also offer an opportunity to upgrade telephone and sewer capacity for modern conveniences, such as rerouting wastewater from the at-capacity Camulos trunk sewer line to the underutilized Eighth Street line. Existing sustainability features at the site should also be retained and upgraded. For instance, current technologies for bio-swales, coupled with appropriate maintenance, can improve rainwater infiltration and retention at the Mall. Other improvements, including native plantings, updated irrigation systems, and ongoing maintenance, can repair the dead grass, dirt, standing water, and erosion that have occurred in some of the landscaped areas throughout years.

The Final EIR should fully scrutinize any claimed environmental benefits of the proposed project within a broad context. For instance, financial analysis does not appear to consider the cost savings of not demolishing 256 building or the substantial expenditure associated with regrading the entire site and associated soil export, as currently proposed. Once again, this calls into question the accuracy of the Alternatives Financial Feasibility Report.

## **VI. Conclusion**

The Conservancy strongly believes that other potentially feasible alternatives exist and should be explored for Wyvernwood while also meeting many of project objectives. Thank you for the opportunity to comment on the Draft EIR for the Boyle Heights Mixed-Use Community Project.

Please add the Conservancy to the notice list for this project as the environmental review process continues and feel free to contact me at [afine@laconservancy.org](mailto:afine@laconservancy.org) or 213-430-4203 should you have any questions.

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<sup>32</sup> Utilities and Service Systems – Solid waste, IV.L-105

Sincerely,

A handwritten signature in black ink that reads "Adrian Scott Fine". The signature is written in a cursive, slightly slanted style.

Adrian Scott Fine  
Director of Advocacy

cc: Councilmember José Huzier, Council District 14  
Office of Historic Resources



CALIFORNIA  
PRESERVATION  
FOUNDATION

NATIONAL  
TRUST  
FOR  
HISTORIC  
PRESERVATION®

San Francisco  
FIELD OFFICE

January 18, 2011

Sergio Ibarra  
City of Los Angeles, Major Projects  
200 N. Spring St., City Hall, Room 750  
Los Angeles, CA 90012  
Sergio.Ibarra@lacity.org

**VIA EMAIL**

**RE: Boyle Heights Mixed-Use Community Project (ENV-2008-2141-EIR)**

Dear Mr. Ibarra:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the proposed Boyle Heights Mixed-Use Community Project (Project). The National Trust and California Preservation Foundation are firmly opposed to the proposed Project which calls for the demolition of the entire Wyvernwood Garden Apartments Historic District, a resource listed on the California Register of Historic Resources and eligible for listing on the National Register of Historic Places. We strongly advise the City of Los Angeles (City) to adopt Alternatives B or C to protect the community character and heritage of Wyvernwood.

Completed in 1941, the Wyvernwood Garden Apartment complex was the first large-scale garden apartment complex ever built in Los Angeles. Its site design is entirely intact and represents an excellent example of the design theory of the Garden City Movement. The complex emphasizes the principles of Garden City design providing for circulation and open space in the configuration of its buildings and landscapes. The primarily Spanish-speaking community that currently resides at Wyvernwood has a strong and unique identity, and many families have lived in the complex for multiple generations. Those tenants have strongly opposed the demolition plan since the project was first proposed in 2008.

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The proposed project by Thurman Interim California, LLC, a Delaware-based limited liability company, would replace 1,187 units of historic rental housing with 4,400 new housing units, including 3,200 condominiums and 325,000 square feet of retail and civic space. Much of the historic open space that makes Wyvernwood unique would be filled in, making the space far less desirable for children and family activities. In addition to impacts to historic resources that cannot be mitigated to a level of insignificance, the Draft EIR identifies significant and unavoidable impacts with regard to aesthetics, air quality, noise, traffic, and solid waste.

### **Interests of the National Trust and California Preservation Foundation**

The National Trust is a private, non-profit corporation that helps people protect, enhance, and enjoy the places that matter to them. Chartered by Congress in 1949, the National Trust protects and defends America's historic resources, furthers the historic preservation policy of the United States, and facilitates public participation in the preservation of our nation's diverse heritage. In 2010 the National Trust provided funding to the resident group Comité de la Esperanza to document its concerns in a multimedia project (available at <http://www.youtube.com/watch?v=bStHGbtv7IU>).

The California Preservation Foundation (CPF) is the only statewide nonprofit organization dedicated to the preservation of California's diverse cultural and architectural heritage. Established in 1977, CPF works with its extensive network of 1,500 members to provide statewide leadership, advocacy and education to ensure the protection of California's diverse cultural heritage and historic places.

The National Trust and CPF have participated in a number of mandamus actions enforcing CEQA's mandate to "take all action necessary" to protect California's "historic environmental qualities." (Pub. Resources Code § 21001 (b).) Among the CEQA cases in which the National Trust and CPF have recently participated as amicus curiae are *Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587 and *Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336.

### **Shortcomings of the Draft EIR**

We agree with the conclusions of the Draft EIR that the demolition of the Wyvernwood complex would be a "significant adverse effect on an historic resource" and that the mitigation proposed "would not reduce the impact to a less-than significant level." As such the City should not approve the project as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of the project. See Pub. Res. Code § 21002.

Contrary to the conclusions of the Draft EIR, we believe that there are feasible alternatives that would meet the project objectives at minimum cost to the project applicant and preserve Wyvernwood as a Historic District. CEQA defines feasibility as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.” CEQA Guidelines, § 15364. In order to prove economic infeasibility the applicant must provide specific “evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project.” *Citizens of Goleta Valley v. Board of Supervisors*, (1988) 197 Cal. App. 3d 1167, 1181

We feel that the Draft EIR is flawed in several respects. Most notably, it lacks a good faith rationale for rejecting as infeasible Alternatives B and C, both of which would preserve the historic qualities of Wyvernwood. For instance, the Draft EIR contains a cost estimate for rehabilitation far out of sync with estimates for similar projects. Its projected \$124,146 for the rehabilitation of each unit is not accompanied by supporting documentation and more than double the actual cost for the rehabilitation of the similar sized garden apartment complex at Lincoln Place in Venice.

The Draft EIR also contains an insufficient analysis for rejecting a viable preservation alternative in Alternative C. At Page V-88 it conspicuously misstates one of the project objectives reciting the developer’s objective to feature a “substantial amount of *new* housing stock.” (emphasis added). The actual objective as stated at Page 11-12 is to “increase the amount and quality of the housing stock.” In addition, the Draft EIR suggests that retaining National Register eligibility of the site would necessarily cause curtailed access for emergency vehicles. We feel that there are very simple, cost effective ways to improve emergency vehicle access at minimal cost to the developer and retain the existing site plan. Alternative C could be improved in this respect at a low cost by adding street signage and lighting, as well as sensitive widening of existing pathways.

## **Conclusion**

We urge the City to adopt an alternative that would preserve the historic Wyvernwood complex as we find the project sponsor has not provided sufficient evidence to prove that it will be an impediment to its development, community, and economic objectives. In addition, we seriously question the project sponsor’s goal to sell its project as “sustainable” given that it calls for the wholesale demolition of 256 existing buildings, their materials wasted.

Thank you for the opportunity to comment on the Draft EIR. Please don't hesitate to contact the Brian Turner at the National Trust at [brian\\_turner@nthp.org](mailto:brian_turner@nthp.org) or Jennifer Gates at the California Preservation Foundation at [jgates@californiapreservation.org](mailto:jgates@californiapreservation.org) with any questions with any questions or concerns.

Sincerely,



Brian R. Turner  
Senior Field Officer/Attorney  
National Trust for Historic Preservation  
Foundation

Jennifer Gates  
Field Services Director  
California Preservation

cc:

Wayne Donaldson, SHPO, California Office of Historic Preservation  
Linda Dishman, Los Angeles Conservancy  
Anthea Hartig, California Historical Society



Sergio Ibarra <sergio.ibarra@lacity.org>

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## Re: File Number ENV-2008-2141-EIR - From the Village Green Homeowner's Association

1 message

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Steven.R.Keylon@wellsfargo.com <Steven.R.Keylon@wellsfargo.com>

Wed, Dec 14, 2011 at 1:55 PM

To: Sergio.Ibarra@lacity.org

Dear Mr. Ibarra –

The Board of Directors of the Village Green Homeowner's Association would like to submit these comments regarding File Number ENV-2008-2141-EIR.

Thank you,

Steven Keylon  
Village Green Board of Directors



Wyvernwood letter.pdf

106K

# VILLAGE GREEN

NATIONAL HISTORIC LANDMARK

December 11, 2011

Sergio Ibarra  
City of Los Angeles, Major Projects  
200 N. Spring Street, City Hall, Room 750  
Los Angeles, CA 90012

RE: File Number ENV-2008-2141-EIR

Dear Mr. Ibarra:

We, the Board of Directors of Village Green, a National Historic Landmark community in Los Angeles, are writing to urge the City of Los Angeles to preserve the thriving and historic Wyvernwood community.

Both Wyvernwood and the Village Green were designed as new paradigms for middle-class housing in Los Angeles. Both were carefully and intelligently planned to successfully foster community, provide ample access to fresh air, light, and recreational facilities, using urban planner Clarence Stein's Garden City principles. Their innovative designs work as well today as they did when they opened in 1939 and 1941. These Garden Apartment communities can't be duplicated today, and should be preserved. While the Village Green is a National Historic Landmark, listed on the National Registry of Historic Places, and is a City of Los Angeles Historic-Cultural Monument, Wyvernwood doesn't have the benefit of such designations, but is largely intact and equally eligible.

The Draft EIR's narrow definition of project objectives favors new construction over preservation, while claiming that the new community will come to include "dozens of LEED-approved design features, embracing conservation and environmental responsibility." However, the National Trust for Historic Preservation and the Association for Preservation Technology International have established that the most environmentally responsible building is one that is already standing. Furthermore, Wyvernwood's thoughtfully designed structures allow for cross-ventilation cooling, which is only further encouraged by the mature tree canopy that now shades the oasis of green space.

We believe that Wyvernwood's existing buildings can be rehabilitated and sensitively upgraded to address the project's sustainability goals and objectives. The Village Green, which received Mills Act status last December, has entered into a contract with the City of Los Angeles to restore and rehabilitate our 629-unit facility. We have created a 10-year plan to replace the majority of our aging and increasingly failing infrastructure, all while our owners and residents remain in their homes. We believe the same can and should be done at Wyvernwood. Wyvernwood has suffered neglect at the hands of its current owners, but we have shown that this sort of deferred maintenance can be successfully reversed.

# VILLAGE GREEN

NATIONAL HISTORIC LANDMARK

Influential architecture critic Lewis Mumford wrote that Garden City communities like Wyvernwood “dared to put beauty as one of the imperative needs of a planned environment: the beauty of ordered buildings, measured to the human scale, of trees and flowering plants, and of open greens surrounded by buildings of low density, so that children may scamper over them, to add to both their use and their aesthetic loveliness,” all of which would be destroyed if the plan to replace this historic cultural resource is approved.

Please evaluate a greater range of viable preservation alternatives that can still retain Wyvernwood’s eligibility as one of Los Angeles’ most important historic districts. Because only one preservation alternative was considered in the Draft EIR (Alternative C), this undermines the purpose of the California Environmental Quality Act (CEQA). In addition to the destruction of an entire community of people proud and passionate to live at Wyvernwood, the project as described would have a negative environmental impact which would take decades to pay off in terms of energy, carbon, water, materials, toxicity, etc.

Sincerely,

Village Green Homeowner’s Association  
Board of Directors

Steven Keylon  
Joe Khoury  
Steve Haggerty  
Robert Nicolais  
Dan Frank  
Dee Dee Chapelle  
John Keho  
Robert Creighton



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## Re: File Number ENV-2008-2141-EIR

1 message

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**matthew** <caol.ila.06@ca.rr.com>

Mon, Jan 9, 2012 at 6:45 PM

To: Sergio.Ibarra@lacity.org

Wyvernwood is not a significant historic place and I look forward to it's demolition and replacement with modern living quarters along with retail and office spaces and recreation areas.

I have worked as a real estate agent in Downtown and East LA for 18 years and I support the redevelopment of this property.

Matthew A.

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## Re: Boyle Heights Mixed-Use Community Project

1 message

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Abdul Ali <awali013@gmail.com>

Mon, Dec 12, 2011 at 6:28 PM

To: sergio.ibarra@lacity.org

December 12, 2011

Submitted Electronically

Sergio Ibarra  
City of Los Angeles, Major Projects  
200 N. Spring Street, city Hall, Room 750  
Los Angeles, CA 90012  
[sergio.ibarra@lacity.org](mailto:sergio.ibarra@lacity.org)

Re: Boyle Heights Mixed-Use Community Project, File Number ENV-2008-2141-EIR

Dear Sergio Ibarra:

I am writing to submit comments on the need for further review and consideration of additional preservation alternatives for the Boyle Heights Mixed-Use Community Project. As a 4th year undergraduate of architecture at Cal Poly Pomona, I have spent the last 10 weeks analyzing the proposed project as part of a studio course, including performing extensive research and analysis on Wyvernwood. Based on my team's project (see attached pdf), we believe there are definitely a variety of alternatives to whole scale clearance of Wyvernwood that have not been fully considered within the DEIR.

Additionally, we think that maintaining Wyvernwood's eligibility as a historic resource can be achieved through feasible preservation alternatives. More analysis is needed and additional preservation alternatives should be considered instead of only Alternative C within the DEIR.

Other mid-to-large-scale garden apartments throughout Los Angeles have fostered strong, stable communities, in large part because of their design (ex: Village Green). The proposed project and preferred alternative will effectively destroy a historic resource and thriving community. Wyvernwood can be saved and rehabilitated with residents in place to address the perceived deficiencies without resulting in the full scale demolition of the entire site and displacement of residents.

As students of architecture and most of all, as citizens, we implore that alternatives be considered before any action is taken. Our attached pdf shows a general outline and site plan of the study we have done on location and a proposed alternative. If we as students could come up with a 55% utilization factor of Wyvernwood, there is no reason why other alternatives can achieve the same or even better results of preserving Wyvernwood.

Thank you for your time and consideration.

Sincerely,

Ali Abdul  
Cal Poly Pomona  
Architecture - 2013



# Housing by the Numbers

Total Units without demolition- 1187

Total Unidades Preservados- 1187

Modified plan C preserves 648 units, demolishes 539 units.

-Savings of 55%.

55% de lo existente preservado

1200 new units are added

1200 nuevas unidades adicionados

1848 total units

1848 unidades en total

661 unit net gain

661 unidades de ganancia

26.8 units per acre

26.8 unidades por acre

31.5 acres of open space

31.5 acres of open space

Projected revenue increase of 65%

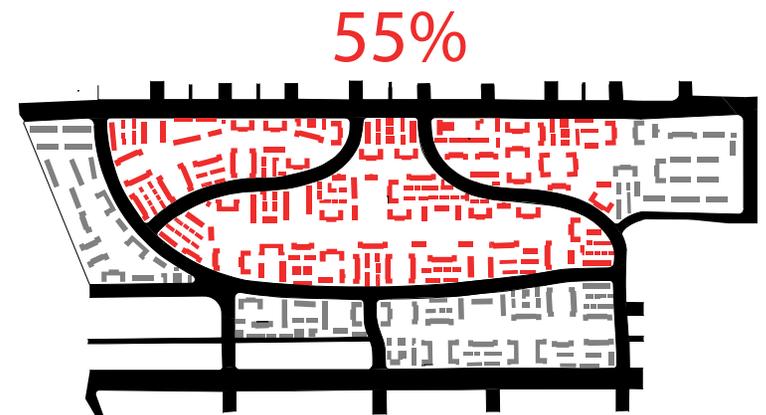
Aumento de 65% de pronosticado ingresos

Centralized commercial space totalling 260,375 S.F.

Total de centro comercial espacio 260,375 pies cuadrados

2 parking spaces provided per unit

2 estacionamientos por unidad



PRESERVATION PLAN



Florence Arafiles <fmarafiles@gmail.com> Thu, Dec 8, 2011 at 1:46 PM  
To: Sergio.Ibarra@lacity.org  
Cc: fchou@laconservancy.org, Luis Hoyos <lghoyos@csupomona.edu>

Dear Sergio Ibarra,

I'm an architecture student at Cal Poly Pomona, and I have just participated in a 10-week design studio considering alternatives to the DEIR. I'd like to submit my comments, which I have attached above.

Thanks,

Florence Arafiles  
M.Arch Candidate 2012  
Historic Preservation Concentration  
California State Polytechnic University  
(510) 304-6148

Comments for DEIR.pdf  
338K

Florence Arafiles

997 Bradford St.  
Pomona, CA 91767  
fmarafiles@gmail.com  
(510) 304-6148



December 8, 2011

Sergio Ibarra  
City of Los Angeles, Major Projects  
200 N. Spring Street, City Hall, Room 750  
Los Angeles, CA 90012  
sergio.ibarra@lacity.org

Dear Sergio Ibarra,

I am writing to submit comments on the need for further consideration of additional preservation alternatives for the Boyle Heights Mixed-Use Community Project. As a student of architecture at Cal Poly Pomona, I have spent the last ten weeks studying the proposed project as part of a design studio, including performing comprehensive research and analysis on Wyvernwood. Based on my team's project (see next page), we believe there are viable alternatives to whole scale clearance of Wyvernwood that have not been fully considered within the DEIR.

In addition:

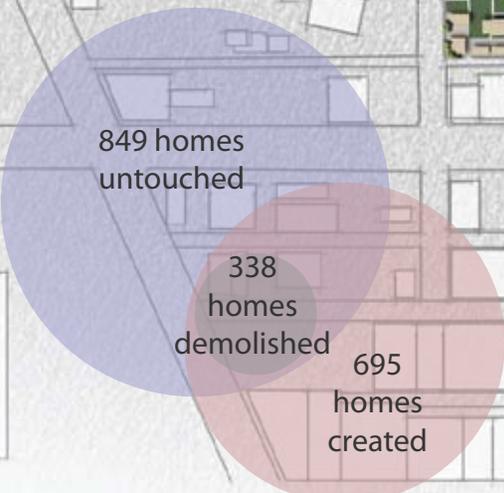
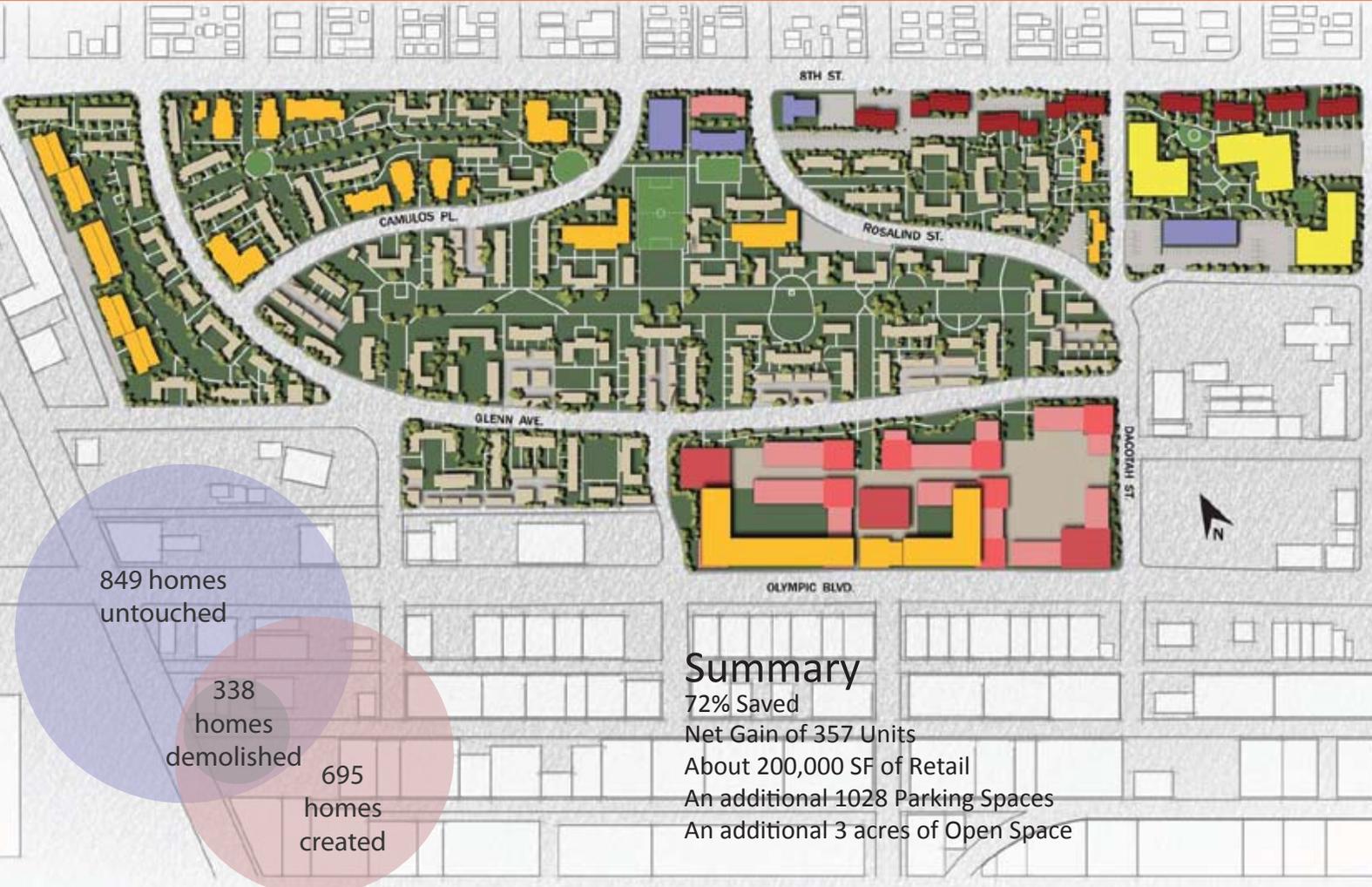
- **Feasible preservation alternatives exist that can meet many of the project objectives while maintaining Wyvernwood's eligibility as a historic resource.** In my group's proposal, we are preserving 72% of the site and we have a net gain of 357 residential units and over 200,000 square feet of retail.
- **Overly-narrow project objectives limit the full consideration of preservation alternatives.** With a broader perspective, we considered diversity to the program, which include live-work units, flats, townhouses, independent living housing, community spaces, and commercial amenities.
- **Other mid-to-large-scale garden apartments throughout Los Angeles have fostered strong, stable communities, in large part because of their design;** an example of this would be Baldwin Hills Village in Culver City which shares similar design characteristics with Wyvernwood.

Even though my team did not study this option; I believe that Wyvernwood can be rehabilitated with residents in place to address the perceived deficiencies without resulting in the demolition of the entire site and/or displacing residents. In conclusion, I feel that other alternatives to complete demolition should be considered.

Sincerely,

Florence Arafiles

# Apadrinando una Comunidad: Wyvernwood



## Summary

72% Saved  
 Net Gain of 357 Units  
 About 200,000 SF of Retail  
 An additional 1028 Parking Spaces  
 An additional 3 acres of Open Space

	Buildings Removed	Units Removed	Buildings Added	Units Added	% Density Increased
Housing	62	338	19	695	2.06
Senior Housing			3	96	1.00
Live-Work			17	75	1.00
Apartments				524	1.16
Leasing Office	1	1	1	1	0.00
Community			3	3	1.00
Retail			6	65	1.00
Entertainment			3	3	1.00
Big Box			5	8	1.00



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# Demolition of a historic garden Apartment complex in Boil Heights.

1 message

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deArmond bebo <dearmondbebo@mac.com>  
To: Sergio.Ibarra@lacity.org

Mon, Dec 12, 2011 at 5:38 PM

PLEASE DO NOT LET THIS HAPPEN!

I have lived at a historic community in LA for over thirteen years, There is nowhere else that I would want to live.

Talking points are great but everyone knows why we should and CAN save important properties.

Let there at least be a BALANCE in our world. Let's do everything possible to preserve our cultural heritage through our architecture.

DeArmond Bebo

---

Joe Benites  
8941 Haskell Avenue  
North Hills, Ca 91343

Letter No. 24

November 15, 2011

Sergio Ibarra  
City of Los Angeles, Major Projects  
200 Spring Street, City Hall, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

DEC 02 2011

Dear Mr. Ibarra:

I am writing in support of the Boyle Heights Mixed Use Community Project being developed by Fifteen Group.

Not only have I known Steven Fink, a Principal in the project, for the last four years and am familiar with his personal involvement in the community outside the project, but am also familiar with the project itself and know the community considerations that have been incorporated.

Years ago I was one of a handful of Hispanics selected for a special program to be trained to build Low and Moderate Income Housing with and for non-profit groups such as the GI Forum and LULAC (League of United Latin American Citizens.

It was in this capacity that I learned and practiced the fundamentals of merging community needs with monetary and development goals as well as meeting City, County, State and Federal requirements.

The elements Steven has incorporated into the Project are exemplary and worthy of being incorporated in other Projects in the City of Los Angeles.

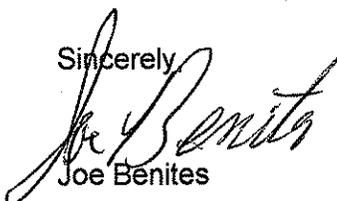
Community involvement and transparency has been such that over 200 Boyle heights residents recently showed up in support of the Project.

The Project incorporates job creation, a mix of housing types for different segments of the population, special elements provided for children and the need for commercial services for the residents.

I am aware that Steven has studied the mistakes made by other Developers in the past and has made certain that the residents now living there are made part of the process and all their needs incorporated into the plan.

Please feel free to call or email me for any further information you may need or require.

Sincerely



Joe Benites  
8941 Haskell Avenue  
North Hills, CA 91343  
Tel: 213-716-0620



Sergio Ibarra <sergio.ibarra@lacity.org>

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## Saving Wyvernwood

1 message

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**Fred Berk** <fredaberk@gmail.com>

**Mon, Jan 16, 2012 at 1:19 PM**

Reply-To: fredaberk@gmail.com

To: Sergio.Ibarra@lacity.org

Dear Mr. Ibarra,

It is important to save the better places people have lived than to let them be destroyed by developers who will reduce the people's living space and attachment to their community. Please do what you can to help save the Wyvernwood complex.

Thank you.

Fred A. Berk

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**From:** Sergio Ibarra [mailto:sergio.ibarra@lacity.org]  
**Sent:** Friday, December 09, 2011 11:13 AM  
**To:** Stephanie Eyestone-Jones; Heidi Mekkelson  
**Subject:** Fwd: WYVERNWOOD - Please preserve

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

**From:** **Monica Bider** <monicalb@earthlink.net>  
**Date:** Fri, Dec 9, 2011 at 11:03 AM  
**Subject:** WYVERNWOOD - Please preserve  
**To:** Sergio.Ibarra@lacity.org  
**Cc:** fchou@laconservancy.org

**Hi Sergio,**

**I am emailing to ask that you fight to preserve the Wyvernwood apartments. This is a terrific community, a historic place that represents a Los Angeles that we should be fighting to preserve. It is NOT ecologically sound, nor is it in the interests of ordinary citizens that these buildings be bulldozed so that development interests can build and earn profits. That's nuts. Stop the destruction of aspects of the city that are human in scale, house people wonderfully, and are a link to an important past. STOP THE DESTRUCTION OF LOS ANGELES that ordinary citizens live in and love.**

**Monica Bider**  
**323-661-2484**



Sergio Ibarra <sergio.ibarra@lacity.org>

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## Re: File Number ENV-2008-2141-EIR, Wyvernwood comments

1 message

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Theresa Bidner <tbidner7@yahoo.com>

Wed, Jan 18, 2012 at 12:24 PM

Reply-To: Theresa Bidner <tbidner7@yahoo.com>

To: "Sergio.Ibarra@lacity.org" <Sergio.Ibarra@lacity.org>

Cc: "fchou@laconservancy.org" <fchou@laconservancy.org>

**Re: File Number ENV-2008-2141-EIR**

Sergio Ibarra

City of Los Angeles, Major Projects

200 N. Spring Street, City Hall, Room 750

Los Angeles, CA 90012

[Sergio.Ibarra@lacity.org](mailto:Sergio.Ibarra@lacity.org)

213-978-1343 (fax)

Dear Mr. Ibarra

I'm writing you regarding the Wyvernwood apartment complex which is being considered for demolition for a new mixed use development. I have been a resident of Los Angeles all my life, being born in East L.A. and spending most of my life as a resident of the Valley. I truly love this city and it's diversity not only in socioeconomic circles but the cultural diversity as well. As an architect I appreciate the diversity of styles and buildings we have in our city. This is one of the reasons we are a leading architectural city in the world and why many come to visit our city.

Wyvernwood is a significant historical place. There are few good examples of Garden Apartment complexes in the city. This style of building is something we need to preserve both for historical reasons but also for the quality of life it provides for its residents. It is my understanding that Wyvernwood is a thriving community. For this reason I urge you to reconsider the proposed development, which appears to be another generic mixed use design that we see all too frequently. I would urge you to consider preserving and rehabilitating the existing complex so our city can retain this historically significant building site.

The draft EIR should consider a greater range of preservation alternatives that would retain Wyvernwood's eligibility as a historic district and a thriving community.

Only one preservation alternative (Alternative C) was considered that attempts to meet project objectives and still maintain eligibility as a historic resource for the purposes of the California Environmental Quality Act (CEQA).

Wyvernwood is as capable as the preferred plan of providing sustainable design features, through rehabilitation of existing buildings that were designed with abundant natural light, fresh air, and green open spaces. For even the greenest new buildings, the environmental impacts of new construction are immense on a site of this size. It will take decades to pay off the costs to the environment in terms of energy, carbon, water, materials, toxicity, etc. As you know the best sustainable action is to retain existing buildings, where possible, and upgrade them. Demolition should be considered the last alternative.

Sincerely

Theresa Bidner

**Letter No. 28**

Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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## Wyvernwood: Stop the Demolition

1 message

**Sherry Breskin <sher8840@yahoo.com>****Sun, Dec 18, 2011 at 8:24 PM**

Reply-To: Sherry Breskin &lt;sher8840@yahoo.com&gt;

To: "Sergio.Ibarra@lacity.org" &lt;Sergio.Ibarra@lacity.org&gt;

Cc: "dianatarango@sbcglobal.net" &lt;dianatarango@sbcglobal.net&gt;, HelenMercado &lt;helen.mercado@lausd.net&gt;, Rita Govea Rodriguez &lt;ritatherovingeye@yahoo.com&gt;, Sherry Breskin &lt;Sher8840@yahoo.com&gt;

Dear Sir,

On many occasions over the past 40 years I have visited Wyvernwood Apartments, Estrada Courts and the Pico-Aliso housing projects in my responsibilities first as teacher and later as an Administrator in the LAUSD; kids needed a ride home, kids were sick and there was no transportation, or on the invitation of families who had concerns. Recently, after the re-build of Pico-Aliso I noticed such a peaceful and welcoming feeling in the streets, and facilities in around Pico-Aliso--day and night. This was a big improvement. I enquired about the change; I was told the population density had been reduced by 20%, thus the calmness that abounded. Don't we want this for all our neighborhoods, all our families, all our students. We have started with Pico-Aliso, let's keep up the good work with Wyvernwood--renewal, maybe but not an increase in density.

Sincerely,

Sherry Petrie Breskin, Principal, Ramona Opportunity

High School

(retired) 909-599-6033

Letter No. 29



Sergio Ibarra <sergio.ibarra@lacity.org>

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## Comment Letter: File Number ENV-2008-2141-EIR / Wyverwood

1 message

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**Barbara Broide** <bbroide@hotmail.com>

Tue, Jan 17, 2012 at 2:36 PM

To: sergio.ibarra@lacity.org

Cc: Flora Chou - LA Conservancy <fchou@laconservancy.org>

Attached please find my comment letter for the above referenced project DEIR.

Thank you,

Barbara Broide



**Wyvernwood - 1-17-12.doc**

36K

2001 Malcolm Ave.  
Los Angeles, CA 90025

January 17, 2012

Sergio Ibarra  
City of Los Angeles Planning Dept., Major Projects  
200 N. Spring Street, City Hall, Room 750  
Los Angeles, CA 90012

Via email: [Sergio.Ibarra@lacity.org](mailto:Sergio.Ibarra@lacity.org)

**Re: File Number ENV-2008-2141-EIR**

Dear Mr. Ibarra:

Please accept this letter of comment in response to the above noted DEIR document that promotes the construction of a new mixed-use project on the grounds of the historic garden apartment development known as Wyvernwood. The proposed project as described would demolish all of the existing residential buildings, including Wyvernwood's 143 original buildings, would destroy a residential community of 1,187 dwelling units and would destroy the garden-style and park-like setting which is so integral to its unique character. Wyvernwood was the first large-scale garden apartment development in Los Angeles and is listed as a historic district in the California Register of Historical Resources, and it is eligible for the National Register of Historic Places. Our City should do everything within its power to avoid the demolition of a designated historic district.

It is most unfortunate that the project DEIR document recently completed does not adequately explore alternatives to the project that developers favor and seek to build. The DEIR contains narrowly defined project objectives that favor demolition over preservation and rehabilitation alternatives. By creating such narrow project objectives, the developer has undermined CEQA's purpose and skirted the serious consideration of less harmful alternatives. This, despite the fact that large-scale garden apartments in Los Angeles and across the nation have been successfully rehabilitated and preserved. Project alternatives should have presented rehabilitation /preservation alternatives that provide a reasonable rate of return on investment AND that retain Wyvernwood's eligibility as a historic district. Only one preservation alternative (C) was considered that attempts to meet project objectives and still maintain eligibility as a historic resource.

The project that is being proposed to replace Wyvernwood would quadruple the site's density with up to 4,400 housing units (both rental and condominium) and 325,000 square feet of retail, office, and commercial space. For even the greenest new buildings that can be proposed, the environmental impacts of such a scale of demolition and development such as this are immense. The existing buildings should be reused in place to avoid the many impacts of demolition and the environmental costs in terms of energy, carbon, water, materials, toxicity, etc.

And, let us not lose site of the fact that this community consists of people and that the complete demolition of the buildings of Wyvernwood will also result in the complete dismantling of a large community of individuals and families who call Wyvernwood home. The impact of this removal cannot be adequately characterized in any written document. A phased rehabilitation

project can preserve the homes of many residents and avoid the mass dislocation of a demolition-based project. I have no doubt that given the proper incentives, the property owner can present excellent alternatives to demolition and can design a project that preserves Wyvernwood's garden-like setting and historic status while also sensitively adding to the property's density and resulting economic return.

The preservation and rehabilitation of Wyvernwood should be a project embraced by both the City and the developer as part of the Boyle Heights Mixed-Use Community Project. The DEIR's "Five Guiding Principles" for the proposed redevelopment project, are very much a part of the existing Wyvernwood complex. Rehabilitation of existing buildings could address the project's sustainability goals and objectives, and would avoid the environmental impacts of new construction of this size.

Given the fact that the City Planning Department has not completed an annual infrastructure assessment as part of the Framework Element since the year 2000, it is difficult to determine whether, in fact, the City's infrastructure can absorb the added density and development proposed in this project. A quadrupling of site density is significant and must not only be evaluated on its own, but also must be reviewed in concert with all other pending developments in the general area for impacts on the City's sewers, water supply, roadway conditions, schools, libraries and all other public services including police, fire, libraries, etc. Without accurate and timely assessments of these aspects of the City's infrastructure, it is nearly impossible for the impacts of a proposed project to be adequately evaluated.

Any final EIR for this project should seriously explore and present a number of feasible rehabilitation alternatives for the property. I would suggest that the property owners consult with the LA Conservancy in the definition of alternatives and seek information from other developers who have successfully rehabilitated similar types of properties.

Thank you for your consideration.

Sincerely,



Barbara Broide

cc: [fchou@laconservancy.org](mailto:fchou@laconservancy.org)



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## wyvenrwood apts

1 message

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bridget brookman <mpuddinfontaine@gmail.com>

Sun, Dec 11, 2011 at 10:19 PM

To: Sergio.Ibarra@lacity.org

This structure houses residents who have been as much a part of Los Angeles as the building itself. Leave this alone, and find another large empty lot for the developers to build upon. The people have spoken and our voices should be much more compelling (as your constituents) than the rhetoric of the developers.

---

**Letter No. 31**

Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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## WYVERNWOOD GARDEN APARTMENTS

1 message

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**Ray Busmann** <raybusmann@roadrunner.com>

Wed, Jan 18, 2012 at 12:16 PM

To: Sergio.Ibarra@lacity.org

**To Whom It May Concern,****I strongly oppose the demolition of the Wyvernwood Garden Apartment complex.****Wyvernwood is listed as a historic district in the California Register of Historical Resources. Every effort should be taken to avoid the complete demolition of a designated historic district.****Other large-scale garden apartments in Los Angeles and across the nation have been successfully rehabilitated and preserved.****Wyvernwood is as capable as the preferred plan of providing sustainable design features, through rehabilitation of existing buildings that were designed with abundant natural light, fresh air, and green open spaces. For even the greenest new buildings, the environmental impacts of new construction are immense on a site of this size.****Wyvernwood is a significant part of Los Angeles history. We owe it to those who came before us and those who will come after us to preserve this amazing project.****Thank you!****Ray Busmann  
1670 Griffith Park Blvd.  
Los Angeles, CA 90026  
323-666-6320**



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# Do not want boyle heights mixed-use community project to go into affect.

1 message

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**Estefania Caceres** <heavymetal5234@hotmail.com>  
To: sergio.ibarra@lacity.org

Fri, Oct 21, 2011 at 10:18 PM

Dear Sergio Ibarra,

I am writing to you to let you know that i do not want the mixed use community project to go into effect for the following reasons. First, and for most the air pollution in Los Angeles is very dirty and really bad. I can see the change in the air wich each day that goes by and it is hard to deal with sometimes but with the construction there will be many more unknown molecules in the air that will irritate me evn more. As a resident of Boyle Heights i do not want to see the beautifull graceious trees that the Wyvernwood Apartments has be destroyed the ;and is barely taking form and looking very Beautiful, green, and lushes. Secondly, the noise level is going to go up and i am going to hear nothing but the tearing down of tress.Also homes that took time too build being torn down and the engines with there pollution and noise . For example when i wake up in the mornings iam not going to be able too hear the cars already on the other side of my home but added to that iam going to hear bangs, honks and rushing energy no more calm enviorment. Thirdly, the traffic and increased tenssion is going to upset the mothers that have to walk their children too school puting the mom at a high possability she will be grumpy. I dont believe some little children want there mom too be upset. Fourthly and most impotent i am greatfull that you took the time to read my letter and that i know that my letter will encourage you too please take it into consideration to stop this madness that going to accure in my home town.

Thank You<3Estefania Caceres<3

P.S

Also i would like to tell you that ,i know for a reason that the people would agree with me.

---

Letter No. 33



Sergio Ibarra <sergio.ibarra@lacity.org>

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## Please, please, please don't destroy Wyvernwood.

1 message

---

Terry Carter <terrycarter80@hotmail.com>

Thu, Dec 15, 2011 at 3:58 PM

To: sergio.ibarra@lacity.org

I know a school custodian who has lived for years in the Wyvernwood apartments. He is a dedicated father who believes that education is the key to his children's future and is a model tenant.

I also know a friend who used to own a condo in the Village Green -- truly an oasis in Los Angeles and a great example of the kind of housing we used to build.

Please, please, please don't destroy Wyvernwood. It could be as beautiful as Village Green -- for probably a lot less money. And you would be preserving some of our best examples of what good housing can be.

Sincerely, Terry Carter

---



Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

## Please OPPOSE the demolition of Wyvernwood Garden Apartments

1 message

Carol Cetrone &lt;perpetua99@gmail.com&gt;

Mon, Jan 16, 2012 at 11:21 AM

To: Sergio.Ibarra@lacity.org

Cc: fchou@laconservancy.org

### Re: File Number ENV-2008-2141-EIR

I am opposed to the destruction of this very special, green place. It would be such a great loss to those who live there and also to the entire Los Angeles community. We are lucky to have this historic property. Please OPPOSE the demolition of Wyvernwood Garden Apartments !!

Sincerely,

Carol Cetrone

#### ► Wyvernwood is a significant historic place.

Opened in 1939 and spanning nearly seventy acres, Wyvernwood was the first large-scale garden apartment development in Los Angeles. It was hailed as a major achievement when built, and its innovative design has fostered a thriving community for generations.

Wyvernwood is listed as a historic district in the California Register of Historical Resources, and it is eligible for the National Register of Historic Places. Every effort should be taken to avoid the complete demolition of a designated historic district.

#### ► Large-scale garden apartments in Los Angeles and across the nation have been successfully rehabilitated and preserved.

Village Green and Lincoln Place are just two examples of other garden apartment communities that have successfully addressed ways to rehabilitate their historic buildings and still provide a reasonable return on investment.

#### ► The draft EIR contains narrowly defined project objectives that favor new construction over preservation.

An overly narrow definition of project objectives undermines the purpose of the California Environmental Quality Act (CEQA) by precluding consideration of less harmful alternatives.

#### ► The EIR should evaluate a greater range of viable preservation alternatives that retain Wyvernwood's eligibility as a historic district.

Only one preservation alternative (Alternative C) was considered that attempts to meet project objectives and still maintain eligibility as a historic resource for the purposes of the California Environmental Quality Act (CEQA).

#### ► Wyvernwood's existing buildings can be sensitively upgraded to address the project's sustainability goals and objectives.

Wyvernwood is as capable as the preferred plan of providing sustainable design features, through rehabilitation of existing buildings that were designed with abundant natural light, fresh air, and green open spaces. For even the greenest new buildings, the environmental impacts of new construction are immense on a site of this size. It will take decades to pay off the costs to the environment in terms of energy, carbon, water, materials, toxicity, etc.

Letter No. 35



Sergio Ibarra <sergio.ibarra@lacity.org>

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## Wyvernwood

1 message

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**SalCharette@aol.com <SalCharette@aol.com>**

**Thu, Dec 15, 2011 at 7:13 AM**

To: Sergio.Ibarra@lacity.org

Cc: fchou@laconservancy.org

Dear Mr. Ibarra,

Please help conserve the Wyvernwood garden apartments. It's clear that this community is more important to the fiber of our city than yet another mixed use development. Put that development in a spot that's not already being used by our citizens to its best advantage. Invest in the future of those families who call Wyvernwood home.

It's our chance to make a difference and preserve some precious Los Angeles history at the same time.

Yours sincerely,

Sally Charette  
Acton, CA  
Los Angeles Conservancy member

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Letter No. 36



Sergio Ibarra <sergio.ibarra@lacity.org>

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## Re: File Number ENV-2008-2141-EIR - Wyvernwood Garden Apartments

1 message

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Cathy Cleveland <cathy.cleveland@gmail.com>

Thu, Jan 12, 2012 at 12:17 PM

To: Sergio.Ibarra@lacity.org

Cc: councilmember.huizar@lacity.org, fchou@laconservancy.org

Dear Mr. Ibarra:

I strongly oppose the \$2 billion housing project proposed for Boyle Heights that would result in the demolition of the remarkable historic Wyvernwood Garden Apartments. It is unconscionable that a community so rich in culture and diversity is continually ravaged by parties whose priorities seem to be driven more by quick financial gain than the preservation of the amazing history and culture of Los Angeles.

I understand that modernization can lead to better living conditions in some cases; however, I do not believe - especially in this case - that the only way to improve the Boyle Heights community is a large-scale housing project requiring the demolition of Wyvernwood. It has been shown time and time again with other restoration projects throughout our city and others that beautiful historical buildings and communities can be effectively renovated to meet community needs. This type of thoughtful restoration project can accomplish improved housing goals without the negative effect that complete demolition would have on the families who have lived in the Wyvernwood apartments for generations.

I work as a professor at East Los Angeles College and am also an active member of the Los Angeles Conservancy. Many of my ELAC students and their families will be directly and negatively affected by this terrible proposed scarring of their community. Why is it that areas rich in Hispanic culture are continually targeted for demolition rather than restoration? Please do not forget perspective – what many look like an improvement to one party is most certainly not always seen that way by another. Many families that have lived in Wyvernwood for generations do not in any way see the demolition of their long-time homes as an improvement.

From a broader community perspective, the ongoing demolition of historic buildings in a city as beautiful and diverse as Los Angeles has deservedly tarnished our reputation as trusted preservationists. The need of a few financially-motivated individuals to seek out the shiny and new is anything but a benefit to our city. Money and government support to improve and increase housing should instead be directed toward the renovation of the incredible historic buildings standing empty in many of the urban neighborhoods, such as Boyle Heights. These buildings stand waiting for forward-thinking organizations and individuals to adopt and renovate them specifically for such purposes. Our city and county governmental bodies should play the role of protectors and innovators, and provide the resources for renewal projects rather than supporting the destruction of history, culture, and vibrant sub-communities within our city.

Thank you for your time. I hope that you will do the right thing and help find an alternative creative solution rather than the proposed demolition of the Wyvernwood Garden Apartments.

Sincerely,

Cathy S. Cleveland

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Cathy S. Cleveland, Ph.D.

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Letter No. 37



Sergio Ibarra <sergio.ibarra@lacity.org>

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## Wyvernwood Garden Apartments Threatened with Demolition

1 message

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China <sincitysilva@yahoo.com>

Tue, Jan 17, 2012 at 4:44 PM

To: Sergio.Ibarra@lacity.org

Hi Sergio,

If there are still living there, where will they move to? There are already plenty of people who are homeless. Will the tenants be relocated?

Cynthia

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**Letter No. 38**

Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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## Save Wyvernwood Garden Apartments

1 message

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**Tom Davies** <tomdavies66@mac.com>

Thu, Dec 15, 2011 at 9:08 AM

To: Sergio.Ibarra@lacity.org

Cc: fchou@laconservancy.org

Dear Mr. Ibarra:

Regarding File Number ENV-2008-2141-EIR:

As a longtime resident of Los Angeles and a fan of history and architecture, I feel compelled to write to you regarding the possible demolition of the Wyvernwood Garden Apartments in Boyle Heights. The loss of such an unique piece of architecture would irreparably degrade the city's historical value and undermine its architectural diversity. For generations, Wyvernwood has provided a distinct living environment for its residents. One need look no further than Village Green and Lincoln Place to find examples of successful rehabilitation of similar garden apartments despite the current economic situation. Issues of the existing buildings' condition can be addressed through thoughtful upgrades. Demolition is just a bad idea. Please join me in supporting the preservation of this historic site as well as the architectural heritage of Los Angeles.

Thank you.

Tom Davies  
Los Angeles

Letter No. 39



Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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## WYVERNWOOD

1 message

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Vera Delpozo <vera.delpozo@aonhewitt.com>  
To: "Sergio.Ibarra@lacity.org" <Sergio.Ibarra@lacity.org>

Thu, Dec 15, 2011 at 8:53 AM

There should be some options to our statement. I am in the middle of this issue, as a property owner I don't think someone should be able to tell me what to do, **BUT** the condition of this complex is very old, very minimal electrical capacity, no internet, and most importantly there is no access for the fire department to all units, and I am very concerned with the safety of the residents.

Vera del Pozo

3135 Malabar Street

Los Angeles, CA 90063

*Vera del Pozo* | Associate

Aon Consulting | Health & Benefits | License #0763901

707 Wilshire Blvd., Suite 2600, Los Angeles, CA 90017

Direct: 1+213.996.1711 | Fax: 1+847.953.1933

[vera.delpozo@aonhewitt.com](mailto:vera.delpozo@aonhewitt.com) | [www.aonhewitt.com](http://www.aonhewitt.com)

-



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Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

## Comments to Boyle-Heights Mixed Use Community Project due 12.19.2011

1 message

Joyce Dillard &lt;dillardjoyce@yahoo.com&gt;

Mon, Dec 19, 2011 at 4:00 PM

Reply-To: Joyce Dillard &lt;dillardjoyce@yahoo.com&gt;

To: Sergio Ibarra &lt;Sergio.Ibarra@lacity.org&gt;

Comments to Boyle-Heights Mixed Use Community Project due 12.19.2011

The City of Los Angeles INTEGRATED RESOURCES PLAN, certified in December 2007, is now obsolete. There have been changes to that Plan since certification. In particular, the following report:

The Donald C. Tillman Water Reclamation Plant In-Plant Storage Project Environmental Assessment, US Army Corps of Engineers, August 9, 2011 mentions significant changes to the SEWAGE SYSTEM. (We have bolded or underlined parts of the report.)

In Section 1 Introduction 1.1 Overview

“In 2007, the City implemented measures to reduce the amount of nitrogen compound discharged from its water reclamation plants as mandated by the Los Angeles Regional Water Quality Control Board (“Nitrogen Compounds and Related Effects Total Maximum Daily Load (TMDL) for the Los Angeles River Watershed”, an amendment to the Los Angeles River Water Quality Control Plan).

**The City now proposes to construct two 7.6 mg basins (proposed project) within the plant’s bermed area to temporarily store 15.2 mg of primary treated wastewater during periods of peak wet weather flows. The basins would be in lieu of the 60 mg tank envisioned in the IRP.”**

In Section 2 Purpose & Need 2.1 Background

**“Tillman began operations in 1985 in the Sepulveda Basin with the intent to relieve pressure on the major interceptor sewers in the San Fernando Valley as well as to relieve pressure on Hyperion Treatment Plant (Hyperion) by treating sewage from the western portion of the San Fernando Valley. After construction of the first phase of the multi-phase build-out, Tillman began operation with a treatment capacity of 40 million gallons per day (mgd). Phase II was planned for and evaluated within the 1982 Wastewater Facilities Plan Environmental Impact Statement (EIS)/Environmental Impact Report (EIR). Phase II began operation in 1991 and provided an additional 40 mgd of treatment capacity. The EIS/EIR also considered two additional phases, Phase III and Phase IV, resulting in an additional 40 mgd each.”**

**Approximately 1.5 miles downstream of Tillman, beneath the intersection of Magnolia Boulevard and Kester Avenue, the returned flow from Tillman conveyed by**

**the 78-inch diameter AVORS is forced into the 42-inch diameter East Valley Relief Sewer (EVRS). This convergence creates a bottleneck that, during substantial rain events, defined herein as 2- to 10-year rain events, causes overflows of the sewer system.**

To regulate the adverse hydraulic conditions during wet weather peak flows, often resulting in downstream surcharges and sewage spills, the City discontinues Tillman's Phase II treatment process and utilizes the existing Phase II sewer treatment structures for in-plant storage of primary effluent. As a result, Tillman only operates Phase I to produce only 40 mgd of Title 22 recycled water for beneficial use during wet weather peak flows.

In the longer term, the

**City proposes to resolve the convergence capacity challenge by constructing three new downstream trunk sewers: the Valley Spring Lane Interceptor Sewer (VSLIS), the Glendale-Burbank Interceptor Sewer (GBIS), and the Northeast Interceptor Sewer Phase II (NEIS II). The anticipated cost of all three sewers is approximately 1.2 billion dollars.** However, in order to minimize sewage overflows, eliminate regulatory violations associated with sewage overflows, and to reduce risks to public health and safety from sewage overflows, the City seeks to implement short-term solutions."

"Typical consequences of overflows include the closure of beaches and other recreational areas, inundated properties, and polluted rivers and streams.

**The California State Water Resources Control Board adopted Statewide General Waste Discharge Requirements in 2006**, which require public agencies that own or operate sanitary sewer systems to develop and implement sewer system management plans and report all overflows to the State Water Resources Control Board.

**The construction of VSLIS, GBIS and NEIS II could occur in the distant future; NEIS II is proposed to be operational in 2022, GBIS in 2029, and VSLIS in 2050. However, there is a need in the shorter term for an interim solution that can be accommodated within the City's existing limited budget, allows the City to comply with State Water Resources Control Board requirements, and also restores maximum treatment and reclamation capacity as well as relieves sewers downstream of Tillman during 2- to 10-year rain events.**

The City has conducted several studies to identify and evaluate potential solutions; the results of these studies are summarized in Section 3.0, Alternatives Considered."

In Section 2 Purpose & Need 2.2 Purpose & Need

The City's primary purpose for the proposed project is

**to provide a short-term method to restore maximum treatment and reclamation capacities of Tillman during substantial rain events, defined as up to 10-year rain events,** while continuing to attenuate peak wet weather flows to the AVORS-EVRS-NOS confluence.

**The purpose fulfills a need to protect public health and welfare and minimize water quality impacts by preventing sewage overflows during substantial storm events."**

In Section 3 Alternatives Considered 3.1 Background

**"In 2006, the City of Los Angeles prepared an Environmental Impact Report (EIR) for the Integrated Resources Plan (IRP).**

The IRP EIR addressed the wastewater facilities needed in the year 2020, while integrating future recycled water and urban runoff needs.

**A project element in the IRP EIR, in part to**

address restoring maximum treatment and reclamation capacities of Tillman while continuing to attenuate peak wet weather flows to the VORSAVORS-EVIS confluence (the primary objective of the proposed project), included the evaluation of a proposed underground 60 million gallon (mg) wastewater storage tank located immediately outside the eastern boundary of Tillman. This proposed 60 mg tank would store primary effluent during substantial storm events.

Since the IRP EIR, the City has reviewed and analyzed the wastewater system needs further. In January 2008, the City prepared the Flow Equalization and Tertiary Filtration Concept Report, which evaluated a number of alternatives to store primary effluent at, or in the vicinity of Tillman, to relieve pressure on the constriction that occurs at the convergence of VORS, AVORS and EVIS, beneath the intersection of Magnolia Boulevard and Kester Avenue. The recommended alternative in 2008 involved the construction of Phase III structures without treatment equipment. Phase III structures would be used for in-plant wet weather storage to relieve the sewer system during substantial storm events by diverting and holding primary effluent for a duration of up to 12 hours, then discharge the effluent back into the AVORS.

In February 2009, the Open Lined Basin Evaluation Technical Memorandum was prepared by the City which identified the currently preferred, and more cost effective action to build in-plant storage in lieu of Phase III structures to store primary effluent at Tillman, and to relieve pressure at the convergence: the construction of two 7.6 mg inplant storage basins to store in total 15.2 mg of primary effluent during substantial rain events

In Section 3.3 Alternatives Evaluated in this EA

“3.3.2 In-Plant Storage Basins Alternative (City-Preferred Alternative)

As discussed above, this alternative identified in the **January 2008 Flow Equalization and Tertiary Filtration Concept Report** involved the construction of Phase III structures without treatment equipment. The City initiated the **Wet Weather Storage Recovery System Project** in 2009, and during this study, a new, more cost-effective alternative emerged: construction of an open lined basin within the Tillman site for in-plant storage of excess wet weather flows. This new alternative is estimated to cost approximately \$23 million, and therefore results in a savings an estimated \$20 to \$30 million to the City, when compared to build-out of Phase III facilities to store primary effluent, while still achieving the project purpose and need.

The In-Plant Storage Basins Alternative involves constructing two open concrete-lined basins that would collectively provide 15.2 mg of storage capacity to be used to relieve the sewer system during substantial storm events and would allow the Tillman plant to remain fully operational during wet weather periods, treating 80 mgd. The two new basins would be constructed on the east side of Tillman, within the existing plant boundary, as shown in Figure 3-1, Tillman Site Plan. Tillman is located in the Sepulveda Basin in the San Fernando Valley area of the City of Los Angeles on property leased by the City from the Corps. The total storage volume, and thus the total volume of wastewater that would be at the Tillman plant at any given time under the In-Plant Storage Basins Alternative would be 59.08 mg, given that both Phase I and Phase II components collectively have a total volume of 43.88 mg and the storage

basins would hold 15.2 mg of primary effluent.

**Details of this alternative include the construction of two 7.6 mg open concrete-lined basins to provide temporary storage of primary effluent with no treatment, a piping and flow control system from the existing primary effluent channel to the two new basins and from the two new basins to the existing AVORS, a new AVORS junction structure, basin washdown systems and modification of the existing primary sedimentation tanks withdrawal piping, as shown in Figure 3-2, Project Overview and Figure 3-3, In-Plant Storage Basins Alternative Details.**

**The design of the storage basins requires a cut and fill method of construction, with construction of a new maintenance road around the basins. More material would be cut than would be required for fill around the road. All excess material, estimated to be approximately 55,000 cubic yards (cy), would be removed from the Sepulveda Basin, as required by the Lease. Much of this excavation and disposal was accomplished during July 2011.**

Approximately 120 truck trips daily, assuming 18-cy trucks haul away the excess soil, would remove the soil over a period of approximately 6 weeks. Trucks would access Tillman from Interstate 405 (I-405) to the east, travel westbound along Victory Boulevard, and turn south at Densmore Avenue. When exiting Tillman trucks would follow the same route back to I-405 and continue eastbound on Highway 101, Highway 134 and Interstate 210 to the City of Azusa. Removed soil is being disposed of at Waste Management Azusa Landfill located at 1211 West Gladstone Street in the City of Azusa.

Additionally, as shown in Figure 3-2, during construction a laydown/staging area and temporary construction worker parking area would be provided in the northeast portion of the plant, outside of the bermed area of Tillman and immediately south of the Septage Transfer Facility. The construction laydown and parking area would occupy approximately 200,000 square feet of the Sepulveda Recreation Area for a period of less than one year.”

The report mentioned in the Environmental Assessment above:

Flow Equalization and Tertiary Filtration Concept Report

is not an approved report or plan.

The City of Los Angeles has not submitted information to the Southern California Association of Governments SCAG known as Local Planning Factors to report on capacity for Water and Sewage in their Metropolitan Planning process. Any Council of Governments reporting does not distinguish the City's unique needs.

Total Daily Maximum Loads need to be estimated for the Watershed, Groundwater Basin and effect on the Southern California Bight.

How do the budgetary reductions in Public Services including Fire, Police, Recreation and Parks, Libraries and any other department reflect in this document?

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

Letter No. 41
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Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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**Re: File Number ENV-2008-2141-EIR**

1 message

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Cynthia Friedlob <cynthiafriedlob@yahoo.com>  
Reply-To: Cynthia Friedlob <cynthiafriedlob@yahoo.com>  
To: "Sergio.Ibarra@lacity.org" <Sergio.Ibarra@lacity.org>

Sat, Jan 14, 2012 at 7:07 PM

Dear Mr. Ibarra:

I support preservation of historic structures such as Wyvernwood (already acknowledged as an historic district), but the situation at Wyvernwood has an additional component: the loss of a well-established community. When the alternative of upgrades to the current apartments is available and when that alternative offers significant environmental benefits as opposed to the massive impact of new construction, Wyvernwood's demolition seems extreme and unnecessary. While I understand that the new plan would create economic gain for the developers, economic gain can't be the basis of all decisions that affect our city and its residents. History has value, too, including the long history of families who have lived at Wyvernwood. The place, the community, and the environment are all worth preserving.

Sincerely,

Cynthia Friedlob  
[www.cynthiafriedlob.com](http://www.cynthiafriedlob.com)

**Letter No. 42**

Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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## Wyvernwood apartments

1 message

seapink &lt;seapink@sbcglobal.net&gt;

Wed, Dec 14, 2011 at 10:15 AM

To: "Sergio.Ibarra@lacity.org" &lt;Sergio.Ibarra@lacity.org&gt;

Cc: fchou@laconservancy.org

**Dear Mr. Ibarra,**

**Please do what you can to save the Wyvernwood apartments. Los Angeles is already built out and over-populated. We don't need any more new large apartment complexes that will increase population, traffic and strain resources. Please see comments below.**

Thanks for your time.

Wendy Gish

**Wyvernwood is a significant historic place.**

As the oldest and largest garden apartment development in Los Angeles, its innovative design has fostered a thriving community. Wyvernwood is listed as a historic district in the California Register of Historical Resources, and it is eligible for the National Register of Historic Places. Every effort should be taken to avoid the demolition of a designated historic district.

**► Large-scale garden apartments in Los Angeles and across the nation have been successfully rehabilitated and preserved.**

Village Green and Lincoln Place are just two examples of other garden apartment communities that have successfully addressed ways to rehabilitate their historic buildings and still provide a reasonable return on investment.

**► The draft EIR contains narrowly defined project objectives that favor new construction over preservation.**

An overly narrow definition of project objectives undermines the purpose of the California Environmental Quality Act (CEQA) by precluding consideration of less harmful alternatives.

**► The EIR should evaluate a greater range of viable preservation alternatives that retain Wyvernwood's eligibility as a historic district.**

Only one preservation alternative (Alternative C) was considered that attempts to meet project objectives and still maintain eligibility as a historic resource for the purposes of the California Environmental Quality Act (CEQA).

**► Wyvernwood's existing buildings can be sensitively upgraded to address the project's sustainability goals and objectives.**

Wyvernwood is as capable as the preferred plan of providing sustainable design features, through rehabilitation of existing buildings that were designed with abundant natural light, fresh air, and green open spaces. For even the greenest new buildings, the environmental impacts of new construction are immense on a site of this size. It will take decades to pay off the costs to the environment in terms of energy, carbon, water, materials, toxicity, etc.

**Letter No. 43**

Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

---

**Re: File Number ENV-2008-2141-EIR**

1 message

**MARGUERITE GREINER** <empire777@sbcglobal.net>

Tue, Dec 13, 2011 at 4:06 PM

To: Sergio.Ibarra@lacity.org

Cc: fchou@laconservancy.org

Dear Mr. Ibarra,

I am extremely sad to hear about plans to demolish the historic Wyvernwood Apartment complex. The last thing L.A. needs is more high-density apartment and retail space. What we do need more of are open, green spaces. The residents of Wyvernwood are against this demolition precisely because they love their park-like setting of these garden apartments. The current setting has fostered a thriving community that has spanned generations. Wyvernwood Apartments are historic and unique, if they are demolished we will be left with an enormous mixed-use development that is not unique, destroys the open green spaces and blocks out the natural light, just so some more developers can get rich. Just think what New York City would be like if the developers had their way and destroyed Central Park to build more apartment buildings and stores? Sure it would create a lot of jobs, but at what long-term cost? The appeal of Manhattan would never be the same without this beautiful park; and residents would have nowhere to go to enjoy the freedom of open air, trees, lakes and bike paths.

We need to preserve garden apartment complexes like these. High rise apartments and stores we have in abundance - green, open air places to live in that foster community we do not.

*Marguerite Greiner*

**Letter No. 44**



Sergio Ibarra <sergio.ibarra@lacity.org>

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## Boyle Heights mixed use development DEIR

1 message

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evelynh2005 <evelynh2005@yahoo.com>

Wed, Dec 14, 2011 at 11:21 PM

Reply-To: evelynh2005 <evelynh2005@yahoo.com>

To: "Sergio.Ibarra@lacity.org" <Sergio.Ibarra@lacity.org>

Please do not tear down this development. Would like to see this remain-appreciate your assistance.

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## Letter of support.

2 messages

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**hector@paramountmatt.com** <hector@paramountmatt.com>

**Tue, Nov 29, 2011 at 4:30 AM**

To: Wyvernwood Ssergio Ibarra <sergio.ibarra@lacity.org>

Hi Sergio, Please send me a draft of letter so we can add the BHCC support for the project. H H  
Sent from my HTC on the Now Network from Sprint!

---

**Sergio Ibarra** <sergio.ibarra@lacity.org>

**Tue, Nov 29, 2011 at 9:21 AM**

To: "hector@paramountmatt.com" <hector@paramountmatt.com>

Hi Hector,  
Thanks for your interest, however the Department of City Planning does not draft letters for other organizations.  
Thank you,

On Tue, Nov 29, 2011 at 4:30 AM, [hector@paramountmatt.com](mailto:hector@paramountmatt.com) <[hector@paramountmatt.com](mailto:hector@paramountmatt.com)> wrote:

Hi Sergio, Please send me a draft of letter so we can add the BHCC support for the project. H H  
Sent from my HTC on the Now Network from Sprint!

--  
Sergio Ibarra  
Major Projects  
200 N. Spring St. Suite 750  
Los Angeles, CA 90012  
213-978-1333  
[Sergio.Ibarra@lacity.org](mailto:Sergio.Ibarra@lacity.org)

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Dear Mr. Huizar,

9-27-2011

My name is Soledad Hernandez. I am a resident here in Wyvernwood Apartments and support the new urbanization project the owners proposing.

I support the project because I see it'll better this community for the future children who will grow up here. It would lower crime activity so children grow up safe and away from negative activity and corruption.

One of my main reasons I support this project is because it will help create a safer environment for the residents who choose to stay. This project will make everyone feel safer by proceeding with it and having better security than to be able to walk at night ~~and~~ without having fear of getting robbed, assaulted or threatened.

I hope this letter will help the project get approved by the Planning Department because honestly we need your help to better Wyvernwood, thank you.

Sincerely,  
Soledad Hernandez

**Letter No. 47**

Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

---

## Wyvernwood Garden Apartment community

1 message

**Dean Hill <uncadino@yahoo.com>****Thu, Dec 15, 2011 at 4:42 PM**

Reply-To: Dean Hill &lt;uncadino@yahoo.com&gt;

To: "Sergio.Ibarra@lacity.org" &lt;Sergio.Ibarra@lacity.org&gt;

Dear Mr. Ibarra,

Based on the report it seems that this is another high density project designed to make huge profits for a few well-healed individuals at the expense of a historic development which was intended to benefit ordinary people and foster a sense of community. That intention has been fulfilled for generations. Why destroy it now?

My wife and I lived in Chase Knolls in Sherman Oaks for several years, so I am well acquainted with the wonderful living environment of the garden city communities as well as repeated attempts of developers to disenfranchise residents of meager means. Please consider the true value of properties like this to the community and the city.

Yours truly,

Dean Hill

**Letter No. 48**

Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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## Comment letter, File Number ENV-2008-2141-EIR

1 message

**Katie Horak <k.horak@arg-la.com>****Mon, Dec 19, 2011 at 3:26 PM**

To: "sergio.ibarra@lacity.org" &lt;sergio.ibarra@lacity.org&gt;

Dear Sergio,

Please find attached my comment letter for the Boyle Heights Mixed-Use Community Project DEIR.

If you need a hard copy, please let me know and I would be happy to send one.

Thank you,  
Katie**Katie E. Horak** | Associate**ARCHITECTURAL RESOURCES GROUP, INC****Architects Planners Conservators**

65 N. Raymond Avenue, No. 220 | Pasadena, CA 91103

626.583.1401 x103 | 626.583.1414 fax | [k.horak@arg-la.com](mailto:k.horak@arg-la.com)

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**Horak comment letter 12\_19\_11.pdf**

20K

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Katie Horak  
1939 Palmerston Place  
Los Angeles, CA 90027

December 19, 2011

Sergio Ibarra  
City of Los Angeles, Major Projects  
200 North Spring Street, City Hall, Room 750  
Los Angeles, CA 90012

RE: File Number ENV-2008-2141-EIR

Dear Mr. Ibarra:

I am writing in response to the Draft Environmental Impact Report for the proposed Boyle Heights Mixed-Use Community Project. This project would result in the demolition of a National Register of Historic Places-eligible property and the elimination of the thriving Wyvernwood community. I wholeheartedly urge the City to act to preserve this significant historic property.

Wyvernwood was the first in a handful of large-scale garden apartment complexes to be constructed in Los Angeles during the Depression and World War II. The importance of the garden apartment property type in the architectural landscape of Los Angeles is not to be understated; it represents an era of multi-family development rooted in the belief that all are deserving of the benefits of careful and deliberate community planning, regardless of income and social standing. Designers and planners of the era drew upon Garden City planning principles, which included super block site planning, low-density development with common garden and recreation space available to all residents, and a complete separation of automobile and pedestrian traffic. In a city such as Los Angeles, where undeveloped land no longer exists and preeminence is placed on maximizing real estate investments, this is a rather luxurious concept; Wyvernwood could not be replicated in today's city.

The proposed Boyle Heights Mixed-Use Community Project will not only eliminate one of Los Angeles's largest and purest examples of Garden City planning principles and New Deal-era housing, it will also disrupt the community that resides there now and has, in some cases, for multiple generations. With some investment, Wyvernwood's buildings and landscape can be repaired, preserved and maintained for generations to come, without the lost revenue of resident relocation and a period of vacancy while the project is constructed. However, the Draft EIR does not sufficiently explore alternatives that both preserve this significant property and meet the project objectives. Recent work at both Lincoln Place and the Village Green, both garden apartment complexes of relatively similar scale to Wyvernwood, has proven that preservation is not only feasible but can also create a return on investment.

Again, please act to preserve this historic property. To eliminate Wyvernwood would represent the loss of one of Los Angeles's nationally-significant properties and a beloved Boyle Heights landmark.

Most sincerely,

A handwritten signature in black ink, appearing to read 'Katie Horak', with a long horizontal flourish extending to the right.

Katie E. Horak

**Letter No. 49**

Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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## Wyvernwood Apartments in East Los Angeles

1 message

**Toby Horn** <thorn626@gmail.com>

Thu, Dec 15, 2011 at 12:49 AM

To: Sergio.Ibarra@lacity.org

Mr. Ibarra,

Thank you for taking my comments into consideration when doing your best to save the Wyvernwood apartments in East Los Angeles.

The preservation of this setting is critical not only to the history it represents, but the cohesive function its design serves today. In terms of providing a safe and healing buffer for its residents from the outside world. Too, the garden complex represents Los Angeles at its best in bringing different cultural and ethnic groups together in a mutual haven.

You need only to look at the high rise housing complexes in other parts of the country to see that they are not the best design from either a crime and improved life. standpoint, nor an aesthetic plus to the community. The Wyvernwood is the precursor to the newly rehabilitated Aliso Village on Mission Road near Macy Street at which LA City learned that privacy, openness and greenery do contribute to a better life.

Older buildings can easily be rehabilitated and are cheaper and use far fewer resources to upgrade them than to build new and less substantial buildings.

Please take these comments into account and recommend that the Wyvernwood apartment complex remain as it is.

Thank you,

Toby Horn  
146 South Fuller Avenue  
Los Angeles 90036  
(323) 934-5611  
[thorn626@gmail.com](mailto:thorn626@gmail.com)



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## Save Wyvernwood

1 message

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**Jessica Hough** <jhoughca@gmail.com>

Sat, Dec 10, 2011 at 11:09 PM

To: Sergio.Ibarra@lacity.org

Cc: fchou@laconservancy.org

December 11, 2011

Sergio Ibarra  
City of Los Angeles, Major Projects  
200 N. Spring Street, City Hall, Room 750  
Los Angeles, CA 90012

Re: File Number ENV-2008-2141-EIR

Dear Mr. Ibarra,

Wyvernwood is a thriving community in Boyle Heights as well as a significant historic place. Please save this historic landmark and give people more reasons to care about Boyle Heights. We know that Wyvernwood can be successfully rehabilitated and preserved. There is no reason not to do this. Please put people and our collective heritage over profit. Please do the right thing and help this important cause.

The EIR should evaluate a greater range of viable preservation alternatives that retain Wyvernwood's eligibility as a historic district. So far only one preservation alternative (Alternative C) was considered that attempts to meet project objectives and still maintain eligibility as a historic resource for the purposes of the California Environmental Quality Act (CEQA).

Preserving Wyvernwood is as good an option as the proposed plan of providing sustainable design features, through rehabilitation of existing buildings that were designed with abundant natural light, fresh air, and green open spaces. Reusing the existing structure is the best course of action for the environment.

Please take action for people, community, and for history. Preserve Wyvernwood.

Sincerely,

Jessica Hough

3167 Rowena Avenue, Los Angeles CA 90027

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Jessica Hough  
(510) 881-3072

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Letter No. 51
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Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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## Save the Wyvernwood, Please

1 message

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**FilmBridge@aol.com <FilmBridge@aol.com>**

Fri, Dec 16, 2011 at 9:32 AM

To: Sergio.Ibarra@lacity.org

Cc: fchou@laconservancy.org

Re: File Number ENV-2008-2141-EIR

Sergio Ibarra

City of Los Angeles, Major Projects

200 N. Spring Street, City Hall, Room 750

Los Angeles, CA 90012

[Sergio.Ibarra@lacity.org](mailto:Sergio.Ibarra@lacity.org)

213-978-1343 (fax)

Dear Mr. Ibarra,

Please save the Wyvernwood Garden Apartments. The courtyard apartments of the late 1930s, were built so well, using materials and workmanship that is forgotten today.

Quality plaster and woodwork and tile and ironwork, these elements can never be replaced.... The historic elements are so solid in comparison to multi-family housing today. Today, builders demolish or gut the interiors of our historic buildings. They use cheap, off the shelf products--- that make our homes look just like every other new building in every other town across the USA, and they will not last over 70 years as the Wyvernwood.

The Wyvernwood, like our other pre-war apartment houses were built to last and the architects tried to create a happy atmosphere for families to live, with open greens, and space to hang laundry, and garden and play and walk and enjoy their lives in a community of neighbors and friends. We are losing these kinds of homes every day in LA, they will never be built again, the developers cannot maximize their profits. Why destroy something that is so useful and beautiful? I believe if we let the Wyvernwood go, we will know in the future, it was a mistake.

Please don't let it go.

Thank you,

Jody Hummer

**Letter No. 52**

Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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## Wyvernwood Garden Apartments

1 message

**William Johnston <billhonsh@gmail.com>****Mon, Jan 16, 2012 at 3:13 PM**

To: Sergio.Ibarra@lacity.org

Re: File Number ENV-2008-2141-EIR

Sergio Ibarra  
City of Los Angeles, Major Projects  
200 N. Spring Street, City Hall, Room 750  
Los Angeles, CA 90012

Dear Mr. Ibarra,

Wyvernwood is historically significant as the first large-scale garden apartment development in Los Angeles.

Large-scale garden apartments in Los Angeles and across the nation have been successfully rehabilitated and preserved. Wyvernwood's existing buildings can be sensitively upgraded to address the project's sustainability goals and objectives. Wyvernwood is as capable as the preferred plan of providing sustainable design features, through rehabilitation of existing buildings that were designed with abundant natural light, fresh air, and green open spaces.

The draft EIR contains narrowly defined project objectives that favor new construction over preservation. An overly narrow definition of project objectives undermines the purpose of the California Environmental Quality Act (CEQA) by precluding consideration of less harmful alternatives.

The EIR should evaluate a greater range of viable preservation alternatives that retain Wyvernwood's eligibility as a historic district. Only one preservation alternative (Alternative C) was considered that attempts to meet project objectives and still maintain eligibility as a historic resource for the purposes of the California Environmental Quality Act (CEQA).

Wyvernwood is listed as a historic district in the California Register of Historical Resources, and it is eligible for the National Register of Historic Places. Its innovative design has fostered a thriving community for generations.

Please preserve this historic treasure for future generations.

Sincerely,

William H. Johnston  
Marina del Rey

**Letter No. 53**

Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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## Wyvernwood: File Number ENV-2008-2141-EIR

1 message

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**Catherine Jurca** <cjurca@hss.caltech.edu>**Mon, Jan 16, 2012 at 11:28 AM**

To: Sergio.Ibarra@lacity.org

Dear Mr. Ibarra:

I am writing in support of preserving the Wyvernwood garden apartment complex. As the first large-scale garden apartment complex in Los Angeles, it is a significant historic and cultural resource in our community, one that the Delaware developer may not fully appreciate. It is impossible to see how even the most extensive mixed-use development plans could not find room for these lovely buildings as part of their proposed residences. The EIR did not appropriately consider sufficient alternatives to demolition, which to me suggests that it did not fulfill its obligations under CEQA. No project that claims an interest in sustainability can justify demolishing the complex: the environmental costs of demolition and reconstruction far outweigh the benefits of new green buildings, especially when the old buildings can be upgraded.

I hope you will help to preserve this unique architectural treasure.

Thank you for your time.

Best wishes,  
Catherine Jurca

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Sergio Ibarra <sergio.ibarra@lacity.org>

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## Re: File Number ENV-2008-2141-EIR (Comment for Wyvernwood DEIR)

1 message

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Knighton, Andrew <aknight@exchange.calstatela.edu>

Wed, Jan 18, 2012 at 5:53 PM

To: Sergio.Ibarra@lacity.org

Cc: fchou@laconservancy.org, "Knighton, Andrew" <aknight@exchange.calstatela.edu>

Sergio Ibarra  
City of Los Angeles, Major Projects  
200 N. Spring Street, City Hall, Room 750  
Los Angeles, CA 90012

Dear Mr. Ibarra:

I write to urge a reconsideration of the plan for the redevelopment of Wyvernwood, and to encourage a renewed respect for its unique historical and architectural significance. My urgency about this matter is informed both by being a Boyle Heights resident and by my position as director of the American Communities Program at California State University, Los Angeles. One of my major research areas as a faculty member at CSULA has been the conservation and redevelopment of historical structures, and especially twentieth-century sites that perhaps may appear of lesser historical concern than buildings of an older vintage.

But these "newer" buildings are indeed architecturally significant, in that they illustrate the utopian rethinking of the very idea of community in the twentieth century. Such ideas, a product of architectural modernism more generally, find a unique expression in the context of southern California. This is part of the reason that it is so gratifying to see that similar garden apartment complexes have been successfully – and quite beautifully – preserved elsewhere in the city, as at Village Green.

Wyvernwood is, however, a particularly notable exemplar of the form, not only because of its status as the first such development in the area, but because of its rich cultural significance as well; it is the hub of a vibrant community reaching through generations of Los Angeleno life. It is Wyvernwood's special design – with its unusual combination of autonomy and collectivity, and its provision of green space integrated into life at the very heart of the metropolis – that has long proven a uniquely potent incubator for community. That community continues to thrive today, but it will likely not survive indifferent redevelopment schemes that clearly reflect priorities other than those that have grounded this rich community for so many decades.

As I have presented the results of my research on twentieth-century architecture to both academic and popular audiences, I have been struck by the way that audiences immediately find ways to relate to these structures. With interest and enthusiasm, all kinds of people readily recognize how these kinds of spaces have shaped their lives and their sense of the American landscape. But I am also struck by the degree to which these same audiences often have yet to realize the delicacy of the history embodied in such sites – we are only just beginning to recognize the value of these increasingly classic buildings. Increasingly, we will judge them to be central to the American experience, and I fear that we will later deeply regret decisions to raze them and to erase the heritage that they represent. I encourage the city of Los Angeles and the potential developers of this site to place themselves at the cutting edge of this emergent understanding of these quite amazing structures and their architectural and cultural significance.

With sincere thanks,

Dr. Andrew Lyndon Knighton

Joseph A. Bailey II, M.D. Endowed Chair of American Communities

Director, American Communities Program, California State University, Los Angeles  
[aknight@calstatela.edu](mailto:aknight@calstatela.edu)

Dr. Andrew Lyndon Knighton

Joseph A. Bailey II, M.D., Endowed Chair of American Communities

Director, CSULA/NEH American Communities Program

Associate Professor of English

California State University, Los Angeles

[aknight@calstatela.edu](mailto:aknight@calstatela.edu)

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Sergio Ibarra <sergio.ibarra@lacity.org>

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## Wyvernwood Garden Apartments/File Number ENV-2008-2141-EIR

1 message

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**Marla Koosed <mkoosed@mac.com>**

**Tue, Jan 17, 2012 at 4:51 PM**

To: Sergio.Ibarra@lacity.org  
Cc: fchou@laconservancy.org

Dear Mr. Ibarra,

Please consider evaluating a greater range of viable preservation alternatives to retain Wyvernwood's eligibility as a historic district. To my knowledge only one preservation alternative (Alternative C) was considered that attempts to meet project objectives and still maintain eligibility as a historic resource for the purposes of the California Environmental Quality Act (CEQA).

The draft EIR appears to contain narrowly defined project objectives that favor new construction over preservation. In my view, an overly narrow definition of project objectives undermines the purpose of the California Environmental Quality Act (CEQA) by precluding consideration of less harmful alternatives.

Wyvernwood's existing buildings can be sensitively upgraded to address the project's sustainability goals and objectives. Wyvernwood is as capable as the preferred plan of providing sustainable design features, through rehabilitation of existing buildings that were designed with abundant natural light, fresh air, and green open spaces. For even the greenest new buildings, the environmental impacts of new construction are immense on a site of this size and it appears that it could take decades to pay off the costs to the environment in terms of energy, carbon, water, materials, toxicity, etc.

Is that really what we want to do moving forward in 2012? Please please please do your part in making a difference and consider options to preserve this treasure of a living breathing community.

Best regards,

Marla Koosed

**Letter No. 56**

Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

## Please save Wyvernwood - It's Important to our Heritage!

1 message

LFEvents@aol.com &lt;LFEvents@aol.com&gt;

Mon, Jan 16, 2012 at 6:55 PM

To: Sergio.Ibarra@lacity.org

Cc: fchou@laconservancy.org

Dear Mr. Ibarra,

We are strongly against the destruction of the Wyvernwood garden apartments. As should be with all significant historic places, Wyvernwood must be preserved as part of our city's cultural and architectural heritage.

Both my family and my husband's family made Boyle Heights their home when they moved to Los Angeles in the late 1920's and early 1930's from New York City. This was their community and they have glowing memories of their years growing up there. We have heard so many stories from them about the local area, the daily activities, parties, schools, etc. There was a strong sense of community in the Boyle Heights neighborhood in those early days and our families were integral parts of that community.

Unlike the cities in Europe and even those on our east coast, Los Angeles does not have a large quantity of early historical sites, houses, buildings, etc. It is essential that our residents feel a sense of our city's history through the preservation of our important historic sites. Tearing these down for a newly constructed multi-purpose center is terribly distressing and contrary to our society's values and priorities.

Do we toss away seniors when they grow old and ill? Of course not! Do we toss out historical documents if we find them in poor condition? No, we do everything in our power to preserve them. Why not rehabilitate the Wyvernwood as we do for everything of significant value?

Preserve our history, preserve our historical landmarks! We become more community minded if our history is there before our eyes. The two of us urge you to save the Wyvernwood apartments - our parents would definitely agree and we are sure that our future generations will find pleasure in the knowledge that a historical site in the neighborhood where their ancestors grew up and thrived, was saved for posterity.

Thank you for hearing us out and we urge you to do what's right and rethink the destruction of these beautiful garden apartments.

Sincerely,

Diane Levine & Dr. Lawrence Levine

***Diane Levine & Alyson Fox***

**Levine Fox Events, Inc.**

**Event Design & Coordination**

**office: 818 783-0273 fax: 818 789-1891**

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[www.levinefoxeventsblog.com](http://www.levinefoxeventsblog.com)

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## Comments for Case - Re: File Number ENV-2008-2141-EIR

1 message

Christian M. <eastlawriter@hotmail.com>

Mon, Dec 19, 2011 at 9:35 AM

To: sergio.ibarra@lacity.org

Intended for: **Re: File Number ENV-2008-2141-EIR**

To Mr. Sergio Ibarra

City of Los Angeles, Major Projects

200 N. Spring Street, City Hall, Room 750

Los Angeles, CA 90012

Hello sir, as a resident of Boyle Heights who has seen this neighborhood transform from time to time with different moods and trends - I can say that the redevelopment of Wyvernwood is not a transformation for the better. In order to understand this situation of Wyvernwood, one must understand Boyle Heights and its history. This economically and politically disenfranchised community has not always the proper resources at its convenience. The dense capacity of the community had a tough time making sure it had the proper access to schools, clinics, and clean air. This community has been attempting to change by its own residents and not by an outside corporation whose mission is to create profit. The promise of jobs and new apartments do not make up for the past and current injustices that Mr. Fink and Fifteen Group claim they will try to erase. In a community that is already affected by pollution from nearby factories and a huge freeway interchange - the demolition and construction of this new project will further harm the neighborhood. Also, as we have seen across the nation in similar cities like New York, Chicago, and Miami - when a new project is created that highlights a new extravagant look, it pulls in a population that is more likely to be wealthier. When that happens, the price of rent goes up in most of the area - which means outside of the proposed redevelopment site - this community cannot afford the consequences of whatever good intentions "urban renewal" means for Boyle Heights. I hope the City realizes that there are far too many gray areas in allowing the redevelopment of these apartments at a time when the already struggling residents of this community cannot take any more surprises with an economy like this. Please take heavy consideration and take a holistic perspective on how this has affected people not corporate profits or city revenue, but at how these attempts to revitalize neglected areas have only proved to be detrimental to the most vulnerable of the community. I ask you to please take note of several points below. The city has to make decisions that will always leave one side happy, but in the wake of what has been happening in the country with how people have been seen as nothing more but commodities to corporate interests - please, do the right thing.

### **Wyvernwood is a significant historic place.**

Opened in 1939 and spanning nearly seventy acres, Wyvernwood was the first large-scale garden apartment development in Los Angeles. It was hailed as a major achievement when built, and its innovative design has fostered a thriving community for generations.

Wyvernwood is listed as a historic district in the California Register of Historical Resources, and it is eligible for the National Register of Historic Places. Every effort should be taken to avoid the complete demolition of a designated historic district.

### **Large-scale garden apartments in Los Angeles and across the nation have been successfully rehabilitated and preserved.**

Village Green and Lincoln Place are just two examples of other garden apartment communities that have successfully addressed ways to rehabilitate their historic buildings and still provide a reasonable return on investment.

### **The draft EIR contains narrowly defined project objectives that favor new construction over preservation.**

An overly narrow definition of project objectives undermines the purpose of the California Environmental Quality Act (CEQA) by precluding consideration of less harmful alternatives.

**The EIR should evaluate a greater range of viable preservation alternatives that retain Wyvernwood's**

**eligibility as a historic district.**

Only one preservation alternative (Alternative C) was considered that attempts to meet project objectives and still maintain eligibility as a historic resource for the purposes of the California Environmental Quality Act (CEQA).

**Wyvernwood's existing buildings can be sensitively upgraded to address the project's sustainability goals and objectives.**

Wyvernwood is as capable as the preferred plan of providing sustainable design features, through rehabilitation of existing buildings that were designed with abundant natural light, fresh air, and green open spaces. For even the greenest new buildings, the environmental impacts of new construction are immense on a site of this size. It will take decades to pay off the costs to the environment in terms of energy, carbon, water, materials, toxicity, etc.

Sincerely,

Edber Macedo

Resident of Boyle Heights for over 20 years

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Sergio Ibarra <sergio.ibarra@lacity.org>

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## Wyvernwood

1 message

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**Arthur Martinez** <agm21st@yahoo.com>

**Wed, Jan 18, 2012 at 9:57 AM**

Reply-To: Arthur Martinez <agm21st@yahoo.com>

To: "sergio.ibarra@lacity.org" <sergio.ibarra@lacity.org>

Cc: fchou@laconservancy.org

Ideally the entire community can be preserved. The existing structures, landscaping and infrastructure can be refurbished to like-new condition meeting current building standards and code at a fraction of the cost of new development. Unfortunately this would not be profitable for the developers.

Does the plan include training for local residents to employ them in the construction of the new development? And will the planned new retail be what we typically see around our City? Nail salons, dollar stores, donut shops, family owned by folks from outside the community who do not hire the locals.

If only there was some way to redevelop the areas immediately surrounding the community. How will tenants be attracted to the new high rise towers when they look out to a view of liquor stores, used tire shops, pawn shops, sleazy motels.

Sincerely,

Arthur Martinez,

Los Angeles native and community-minded citizen.

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**From:** Sergio Ibarra [mailto:sergio.ibarra@lacity.org]  
**Sent:** Friday, December 09, 2011 10:18 AM  
**To:** Stephanie Eyestone-Jones; Heidi Mekkelson  
**Subject:** Fwd: Boyle Heights Mixed-Use Community Project, File Number ENV-2008-2141-EIR

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

**From:** Joyceline Martinez <joycelinemartinez@gmail.com>  
**Date:** Thu, Dec 8, 2011 at 1:47 PM  
**Subject:** Re: Boyle Heights Mixed-Use Community Project, File Number ENV-2008-2141-EIR  
**To:** Sergio.Ibarra@lacity.org  
**Cc:** fchou@laconservancy.org, Luis Hoyos <lghoyos@csupomona.edu>

Dear Sergio Ibarra,

I am a student at Cal Poly Pomona who participated in a studio course who is submitting alternatives to the demolition of Wyvernwood. Attached you will find a letter with my comments to the DEIR.

Thank you,

Joyceline B. Martinez

M. Arch Candidate 2012  
Historic Preservation Concentration  
Cal Poly Pomona  
(323) 599-6777

Joyceline B. Martinez

557 N. Kenmore Ave. #9  
Los Angeles, CA 90004  
joycelinemartinez@gmail.com  
(323) 599-6777



December 8, 2011

Sergio Ibarra  
City of Los Angeles, Major Projects  
200 N. Spring Street, City Hall, Room 750  
Los Angeles, CA 90012  
sergio.ibarra@lacity.org

Dear Sergio Ibarra,

I am writing to submit comments on the need for further consideration of additional preservation alternatives for the Boyle Heights Mixed-Use Community Project. As a student of architecture at Cal Poly Pomona, I have spent the last ten weeks studying the proposed project as part of a design studio, including performing comprehensive research and analysis on Wyvernwood. Based on my team's project (see next page), we believe there are viable alternatives to whole scale clearance of Wyvernwood that have not been fully considered within the DEIR.

In addition:

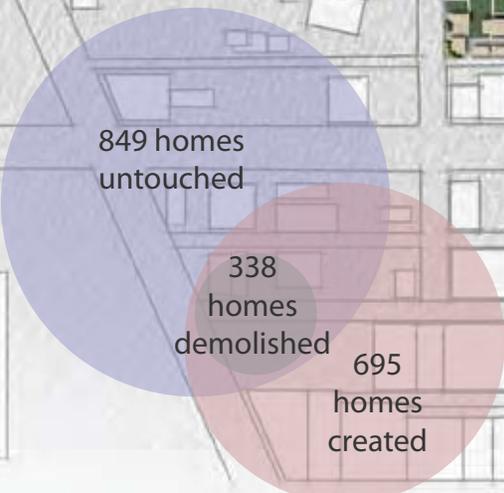
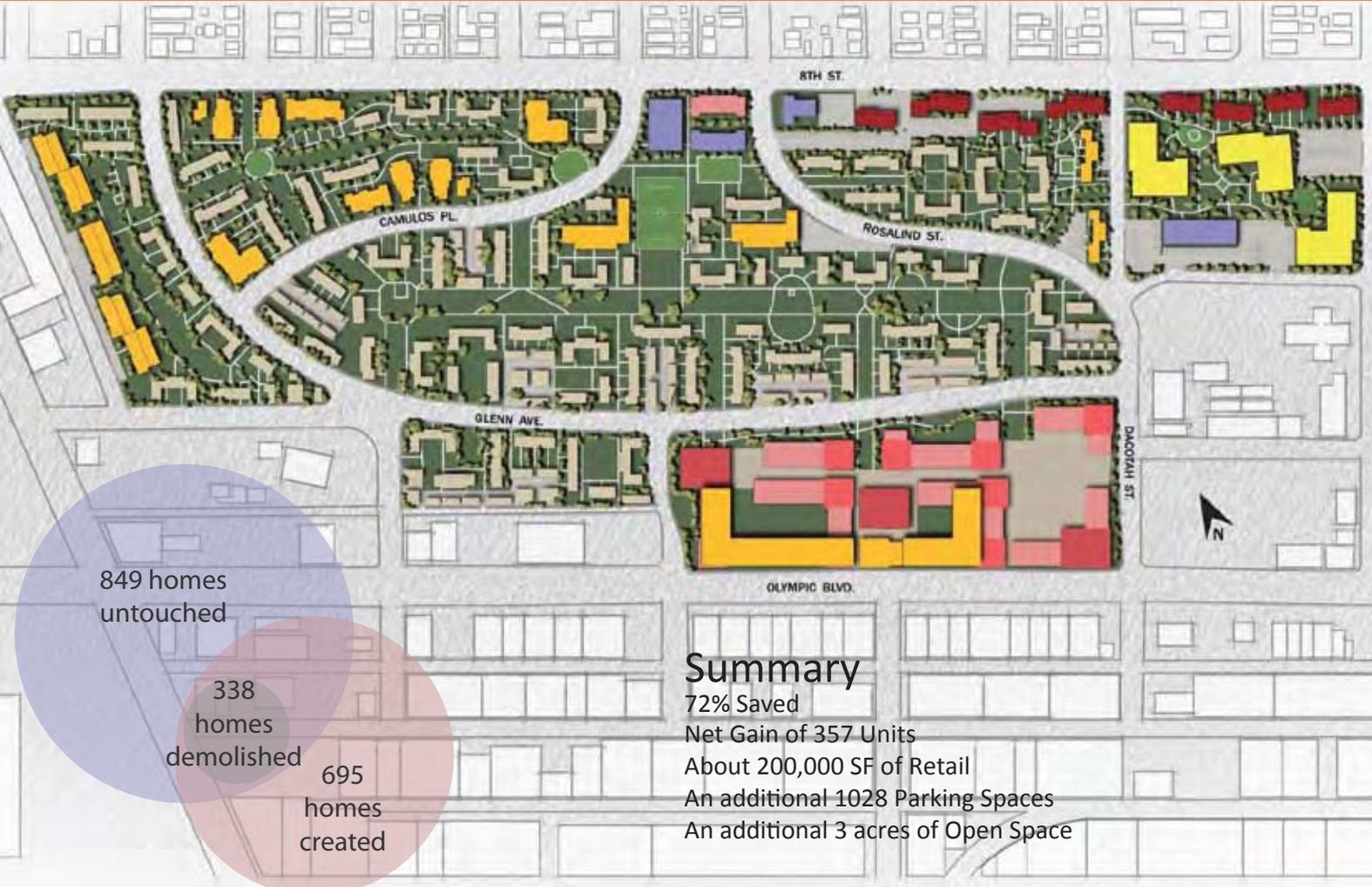
- **Feasible preservation alternatives exist that can meet many of the project objectives while maintaining Wyvernwood's eligibility as a historic resource.** In my group's proposal, we are preserving 72% of the site and we have a net gain of 357 residential units and over 200,000 square feet of retail.
- **Overly-narrow project objectives limit the full consideration of preservation alternatives.** With a broader perspective, we considered diversity to the program, which include live-work units, flats, townhouses, independent living housing, community spaces, and commercial amenities.
- **Other mid-to-large-scale garden apartments throughout Los Angeles have fostered strong, stable communities, in large part because of their design;** an example of this would be Baldwin Hills Village in Culver City which shares similar design characteristics with Wyvernwood.

Even though my team did not study this option; I believe that Wyvernwood can be rehabilitated with residents in place to address the perceived deficiencies without resulting in the demolition of the entire site and/or displacing residents. In conclusion, I feel that other alternatives to complete demolition should be considered.

Sincerely,

Joyceline B. Martinez

# Apadrinando una Comunidad: Wyvernwood



## Summary

- 72% Saved
- Net Gain of 357 Units
- About 200,000 SF of Retail
- An additional 1028 Parking Spaces
- An additional 3 acres of Open Space

	Buildings Removed	Units Removed	Buildings Added	Units Added	% Density Increased
Housing	62	338	19	695	2.06
Senior Housing			3	96	1.00
Live-Work			17	75	1.00
Apartments				524	1.16
Leasing Office	1	1	1	1	0.00
Community			3	3	1.00
Retail			6	65	1.00
Entertainment			3	3	1.00
Big Box			5	8	1.00

**From:** Sergio Ibarra [mailto:sergio.ibarra@lacity.org]  
**Sent:** Friday, December 09, 2011 10:18 AM  
**To:** Stephanie Eyestone-Jones; Heidi Mekkelson  
**Subject:** Fwd: Letter for Wyvernwood DEIR

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

From: **Keyur Maru** <keyur.calpoly@gmail.com>  
Date: Thu, Dec 8, 2011 at 9:06 PM  
Subject: Letter for Wyvernwood DEIR  
To: sergio.ibarra@lacity.org  
Cc: lghoyos@csupomona.edu, fchou@laconservancy.org

Dear Sergio Ibarra,

Please find attached a letter commenting on the DEIR for the Wyvernwood, Boyle Heights Mixed-Use Community Project.

Thank You.

Keyur Maru  
*Student at Cal Poly Pomona, Architecture Program*

December 6, 2011

Submitted Electronically

Sergio Ibarra

City of Los Angeles, Major Projects

200 N. Spring Street, City Hall, Room 750

Los Angeles, CA 90012

sergio.ibarra@lacity.org

**Re: Boyle Heights Mixed-Use Community Project, File Number ENV-2008-2141-EIR**

Dear Sergio Ibarra,

I am writing to submit comments on the need for further consideration of additional preservation alternatives for the Boyle Heights Mixed-Use Community Project. As a student of architecture at Cal Poly Pomona, I have spent the last ten weeks studying the proposed project as a part of a studio course, including performing exhaustive research and analysis on the Wyvernwood community. Based on my team's detailed documentation and project development (images follow), we believe there are viable alternatives to whole scale demolition and clearance of the Wyvernwood community that have not been fully considered within the DEIR.

After visiting the Wyvernwood community and analyzing the site configuration, we feel that many feasible preservation alternatives exist that can meet many of the project objectives without destroying significant portions of the community. As a crucial aspect of the study, we have also reviewed Alternative C from the DEIR and we feel that additional preservation alternatives should be considered instead of relying solely on this one.

In addition to our research, we have also visited and studied other mid-to-large-scale garden apartments throughout Los Angeles which have a successful rate of fostering strong, stable communities, in large part due to their design. In contrast, the proposed project by the developers will effectively destroy a historic resource and thriving community through demolition and relocation.

As you will clearly see in the following project alternative design, created by our team, we feel that Wyvernwood can be rehabilitated with residents in place to address the perceived deficiencies without resulting in the demolition of the entire site and/or displacing residents. We have organized a system of infill development that can take advantage of under-used spaces, such as parking/garage lots in between residential buildings, and convert them into landscaped courtyards surrounding new 8 to 12 unit apartment buildings. Thus, by creating such infill development across the site, we are able to increase the living density.

Additionally, our project proposes a partial demolition of spaces along Olympic Blvd in order to create a mixed-use plaza consisting of retail, offices, a community center and residential lofts. On the northeast end of the project, we have proposed new development of senior homes and a senior center. In this way, we are able to preserve over 75% of the Wyvernwood community while achieving many of the objectives of density, mixed-use retail and office spaces.



In summary, we feel that there is a definite solution that will allow for the rehabilitation of Wyvernwood without resulting in large-scale demolition or relocation of the existing community and its residents. After ten weeks of in-depth research and analysis, we have understood the Wyvernwood site and developed a reasonable alternative in addition to those presented in the DEIR that can serve as a mediation between the developers and the Wyvernwood community. This neighborhood of friends and families is a historical part of the Los Angeles and Boyle Heights community and should be given the chance to be preserved and maintain its eligibility as a historic resource.

Thank You.

Sincerely,

Keyur Maru

*Student, Cal Poly Pomona, Architecture Program*

cc: Flora Chou, Los Angeles Conservancy

cc: Luis Hoyos, RA, Profesor - Cal Poly Pomona

**Letter No. 61**

Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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**File Number ENV-2008-2141-EIR**

1 message

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**Tina McKenzie <mckenzo@gmail.com>****Wed, Dec 14, 2011 at 6:48 PM**

To: Sergio.Ibarra@lacity.org

Re: File Number ENV-2008-2141-EIR  
Sergio Ibarra  
City of Los Angeles, Major Projects  
200 N. Spring Street, City Hall, Room 750  
Los Angeles, CA 90012  
[Sergio.Ibarra@lacity.org](mailto:Sergio.Ibarra@lacity.org)  
213-978-1343 (fax)

Dear Mr. Ibarra,

I am writing to urge you to prevent the demolition of the historic Wyvernwood Garden Apartment community in Boyle Heights. As a Los Angeles native, it breaks my heart to see the character and history of our city lost when places of such significance are destroyed.

Wyvernwood is most definitely such a place. It was the first large-scale garden apartment development in Los Angeles when it was opened in 1939 and considered a major achievement for its innovative design.

Since it is listed as a historic district in the California Register of Historical Resources and is eligible for the National Register of Historic Places, surely every effort possible must be taken to save it.

Recent history has proven that this can be done. Large-scale garden apartments in Los Angeles and all over the country have been successfully preserved and rehabilitated. Village Green and Lincoln Place are just two examples of garden apartment communities that have rehabilitated their historic buildings while still providing a reasonable return on the investment.

The draft EIR contains narrowly defined project objectives that favor new construction over preservation, which undermines the purpose of the California Environmental Quality Act (CEQA) by precluding consideration of less harmful alternatives.

A greater range of viable preservation alternatives should be evaluated by the EIR to retain Wyvernwood's eligibility as a historic district.

Only one preservation alternative (Alternative C) was considered that attempts to meet project objectives and still maintain eligibility as a historic resource for the purposes of CEQA.

Wyvernwood's existing buildings can be upgraded to address the project's sustainability goals and objectives. And Wyvernwood is as capable as the preferred plan of providing sustainable design

features, through rehabilitation of existing buildings that were designed with abundant natural light, fresh air, and green open spaces.

No matter how “green” any new buildings might be, the environmental impact of new construction on a site of this size would be huge—taking decades to pay off the costs in terms of energy, carbon, water, materials, and toxicity.

I worked at the Conservator at the Academy of Motion Picture Arts & Sciences in the 1990s and know the importance of preserving things of historical importance. They are irreplaceable—and once they are gone, they are gone forever. Please don’t let this happen to Wyvernwood. It can be rehabilitated and preserved and is just too important to lose.

Thank you for your time and consideration on this matter.

Sincerely,

Tina McKenzie

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Letter No. 62
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I write to urge you to prevent the demolition of the historic Wyvernwood Garden Apartment community in Boyle Heights. Opened in 1939 and spanning nearly seventy acres, Wyvernwood was the first large-scale garden apartment development in Los Angeles. It was hailed as a major achievement when built, and its innovative design has fostered a thriving community for generations. Wyvernwood is listed as a historic district in the California Register of Historical Resources, and it is eligible for the National Register of Historic Places. Every effort should be taken to avoid the complete demolition of a designated historic district.

I am concerned that the draft EIR contains narrowly defined project objectives that favor new construction over preservation. An overly narrow definition of project objectives undermines the purpose of the California Environmental Quality Act (CEQA) by precluding consideration of less harmful alternatives.

The EIR should evaluate a greater range of viable preservation alternatives that retain Wyvernwood's eligibility as a historic district. Only one preservation alternative (Alternative C) was considered that attempts to meet project objectives and still maintain eligibility as a historic resource for the purposes of CEQA. Viable preservation options are available. Village Green and Lincoln Place are just two examples of other garden apartment communities that have successfully addressed ways to rehabilitate their historic buildings and still provide a reasonable return on investment.

New construction is always more expensive than sustainable preservation work on existing structures. In these difficult economic times, we should choose the option that saves money and helps preserve our city's unique cultural monuments.

Sincerely,

Irma Mejia

Valley Village, CA

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Irma.mejia@gmail.com

Saturday, December 17, 2011



Sergio Ibarra <sergio.ibarra@lacity.org>

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## Wyvernwood Apartments

1 message

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Miller, Thomas <Thomas.Miller@cnb.com>

Thu, Dec 15, 2011 at 3:25 PM

To: Sergio.Ibarra@lacity.org

I am writing to add my own voice to the voices of those who want to see this historic site rehabilitated and incorporated with as much preservation integrity as is possible into proposed plans for redevelopment.

As one of the few – and perhaps grandest – pre-war garden apartment specimens in Los Angeles, Wyvernwood deserves this city's full attention and support. Without it, one can be sure that the developer involved will wipe yet another Los Angeles/California historic landmark from the map.

Clearly there is precedent for a preservation-minded compromise as illustrated in the rehabilitation/preservation *and development* of both Lincoln Place and Village Green. Wyvernwood trumps both of these in my opinion given its scale, rich history and vibrant community.

Please support the call for a broad range of true preservation options as this project continues.

**Thomas R. Miller**

EVP Marketing

City National Bank

P:213 673-7607 | F: 213 673-7622

Letter No. 64
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Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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## Wyvernwood/File Number ENV-2008-2141-EIR

1 message

**Millner, Daniel L.** <dmillner@arts.ucla.edu>

Tue, Jan 17, 2012 at 2:37 PM

To: "Sergio.Ibarra@lacity.org" &lt;Sergio.Ibarra@lacity.org&gt;

Cc: "fchou@laconservancy.org" &lt;fchou@laconservancy.org&gt;

Dear Mr. Ibarra,

Please work to preserve Wyvernwood Garden Apartments. Wyvernwood is a significant historic place, the first large-scale garden apartment in Los Angeles. It currently fosters a thriving community.

Wyvernwood is listed as a historic district in the California Register of Historical Resources, and is eligible for the National Register of Historic Places.

Large scale garden apartments in Los Angeles have been successfully rehabilitated and preserved. I live in Village Green, and can attest from personal experience the social and economic benefits of garden apartment rehabilitation.

I'm concerned that the EIR does not evaluate a greater range of viable preservation alternatives. This undermines the purpose of CEQA by precluding consideration of less harmful alternatives.

It would be a travesty if Wyvernwood is lost. Please take actions to insure it is safe.

Thank you.

Daniel

Daniel Millner  
Manager, UCLA Dept. of World Arts and Cultures/Dance  
UCLA Anderson Fully Employed MBA Program, Class of 2014

UCLA Department of World Arts and Cultures/Dance  
School of the Arts and Architecture  
Kaufman Hall, Suite 150  
Mailcode 160806  
Phone: 310-206-4274  
Fax: 310-825-7507  
E-mail: [dmillner@arts.ucla.edu](mailto:dmillner@arts.ucla.edu)  
web: [www.wac.ucla.edu](http://www.wac.ucla.edu)



Sergio Ibarra <sergio.ibarra@lacity.org>

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## Wyvernwood Garden Apartments

1 message

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tracy moore <tracymoore@earthlink.net>

Mon, Jan 16, 2012 at 11:54 AM

To: Sergio.Ibarra@lacity.org

Cc: fchou@laconservancy.org

Dear Mr Ibarra,

In your discussions about plans for Wyvernwood Garden Apartments, I hope you will consider sufficient modifications so that the historic nature of the original buildings is not lost. Mixed-use buildings on insignificant land can be great additions to the community, but when they come at the expense of community and history, they can be very destructive.

I have read the LA Conservancy material about the project. Their suggestions for rehabilitation appear reasonable and practical, allowing the historic apartments to continue on the map that tells the historic story of Los Angeles, which is important to me as a resident of Wilshire Park HPOZ for 5 years and of Los Angeles for 21 years.

The arguments in favor of preservation, other than respect for historic Los Angeles, that are particularly persuasive to me are:

- the basic goals of the project can be met without going to such severe lengths
- the feasibility of following sustainability principles in designing a development plan that will also retain the integrity of the Apartments

Sincerely,

Tracy Moore  
966 3rd Ave  
LA 90019

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Letter No. 66



Sergio Ibarra <sergio.ibarra@lacity.org>

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## Wyvernwood Garden Apts

1 message

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**niknak114@roadrunner.com** <niknak114@roadrunner.com>

**Thu, Dec 15, 2011 at 11:35 AM**

To: Sergio.Ibarra@lacity.org

Dear Mr. Ibarra,

In this day and age where a sense of community is slowly being eroded away, it would be a tragedy to see a long standing community demolished in the name of "progress." By displacing the people, you are destroying the community. There must be another way...

Susan Nakamura  
1429 Marcella Lane  
Santa Ana, CA 92706

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Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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## Wyvernwood Project

1 message

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**Carol Ng <carolng38@yahoo.com>****Mon, Jan 16, 2012 at 11:53 PM**

To: Sergio.Ibarra@lacity.org

Cc: fchou@laconservancy.org, Councilmember Jose Huizar &lt;councilmember.huizar@lacity.org&gt;

Re: File Number ENV-2008-2141-EIR

Attn: Sergio Ibarra  
City of Los Angeles, Major Projects  
200 N. Spring Street, City Hall, Room 750  
Los Angeles, CA 90012

Dear Mr. Ibarra,

From about 1975 - 1982, I worked for the County Division of Youth Services and had cause to be in the vicinity of these garden apartments nearly every week. Located in an area known as a "gang territory", these apartments stood out as an oasis in a troubled community. The apartments were well-maintained and landscaped, a rarity in this neighborhood. For years, these apartments have been a proud symbol of the possibilities for residents in this community and it would be a travesty to raze this complex. They hold a history of this area beyond being a mere set of buildings.

Further, I feel the EIR should evaluate a greater range of viable preservation alternatives that retain Wyvernwood's eligibility as a historic district. Wyvernwood's existing buildings can be sensitively upgraded to address the project's sustainability goals and objectives. These buildings were designed with abundant natural light, fresh air, and green open spaces. The environmental impacts of new construction are huge on a site of this size. It will take decades to pay off the costs to the fabric of the community and to the environment in terms of energy, carbon, water, materials, toxicity, to name a few.

I join and commend Council Member Huizar in his objections to any project plan that would demolish the Wyvernwood apartments.

Very truly yours,  
Carol Ng  
960 Edgecliffe Drive  
Los Angeles, CA 90026  
(323) 665-4448

**Letter No. 68**



**Sergio Ibarra <sergio.ibarra@lacity.org>**

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## Wyvernwood

1 message

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**Pamela Palmer <ppalmer@artecho.com>**

**Tue, Jan 17, 2012 at 9:35 PM**

To: Sergio.Ibarra@lacity.org

Dear Mr. Ibarra,  
Please find attached letter regarding the preservation of Wyvernwood.  
Thank you,

Pamela Palmer ASLA, President  
ARTECHO Architecture and Landscape Architecture  
1639 Electric Ave., Ste. A  
Venice, CA 90291  
Ph 310-399-4794  
Fx 310-399-3294  
[www.artecho.com](http://www.artecho.com)



**Wyvernwood Letter.pdf**

420K

artecho

architecture + landscape architecture

art

January 17, 2012

LA City Planner Sergio Ibarra  
City of Los Angeles, Major Projects  
200 N. Spring St.  
City Hall, Rm. 750  
Los Angeles, CA 90012

via email: [Sergio.Ibarra@lacity.org](mailto:Sergio.Ibarra@lacity.org)

Cc: Flora Chou

via email: [fchou@laconservancy.org](mailto:fchou@laconservancy.org)

RE: File Number ENV-2008-2141-EIR

Dear Mr. Ibarra,

I am a landscape architect and my husband is an architect. We are residents of Los Angeles, and have studied the Garden City Movement. We are convinced that Wyvernwood is an extraordinarily successful housing model that should be replicated, and not destroyed. We ask you to do everything possible to preserve this community in its environment.

The garden living complex offers much to society:

Historically, Wyvernwood is listed as a historic District in the California Register of Historical Resources. Collaborating on the design of this Garden Complex were architects (David) Witmer and (Loyall F.) Watson, working with landscape architect, Hammond Sadler. Sadler worked for many years in the esteemed Olmsted office. The thinking of the office was that green space restores and revitalizes the human spirit, while offering the opportunity for recreation and relaxation.

Environmentally, the mature landscape at Wyvernwood reduces that heat-island effect that is so prevalent in Los Angeles. Mature trees capture particulate pollution and store storm water run-off. The massing of the buildings and the green space they surround promote interaction among children and families who live in this community.

techo  
howard rosen & pamela palmer

1639 electric  
avenue, suite a  
venice, ca 90291  
t.310.399.4794  
f.310.399.3294

[artecho@artecho.com](mailto:artecho@artecho.com)

[www.artecho.com](http://www.artecho.com)

art

Preservation of Wyvernwood  
Page 2

While this environment of buildings and landscape is of historic significance and the type of model that we should be aspiring to today, this large scale garden apartment complex has proved that the sense of community has been created by virtue of the type of building and relationship of the building to the landscape.

The social/ cultural environment that exists here will be lost if the plan to demolish these buildings is accomplished.

We ask you to do everything possible to sustain this community by promoting a scheme that will preserve the historic, environmental, social and cultural fabric that has evolved at Wyvernwood. Our city needs more housing such as this. We know that building at this density is rare today, so please do what you can to insure that this situation is preserved.

The City of Los Angeles needs to be known as a City of sustainability, one that cares for what exists, preserves what is working and is culturally and environmentally conscientious.

Thank you for your efforts.

Sincerely,

Pamela Palmer, ASLA Landscape Architect  
Howard Rosen, Architect

tech  
architecture + landscape architecture + architecture + landscape architecture + architecture + landscape architecture



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## wyvernwood apartments.....

1 message

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**ceasar quinonez <ceasarquinonez@yahoo.com>**  
Reply-To: ceasar quinonez <ceasarquinonez@yahoo.com>  
To: "sergio.ibarra@lacity.org" <sergio.ibarra@lacity.org>

**Fri, Oct 21, 2011 at 2:25 PM**

simple question when is the very first construction truck moving in to start the 1st stage of the wyvernwood apartments construction or demolition.....we want to see for ourselves that ...the project is going forward.....lol thank you

---

From: Sergio Ibarra [mailto:sergio.ibarra@lacity.org]  
Sent: Friday, December 09, 2011 10:18 AM  
To: Stephanie Eyestone-Jones; Heidi Mekkelson  
Subject: Fwd: Boyle Heights Mixed-Use Community Project, File Number ENV-2008-2141-EIR

[Quoted text hidden]

Marissa L. Rodrigues <mlrodrigues@csupomona.edu> Sun, Dec 11, 2011 at 4:28 PM  
To: "sergio.ibarra@lacity.org" <sergio.ibarra@lacity.org>  
Cc: "fchou@laconservancy.org" <fchou@laconservancy.org>, "lghoyos@csupomona.edu" <lghoyos@csupomona.edu>

Dear Sergio Ibarra,

This email is in regards to the new mixed-use project in Boyle Heights. Based on research of Boyle Heights, Wyvernwood and the community's historical significance as well as completion of a group project to develop the area, I believe that there needs to be further consideration of additional preservation alternatives for this project.

Many alternatives were developed by students in this studio course, including the attached, which prove that these proposals are a plausible alternative to fully clearing the entire community of Wyvernwood. We believe that the historical preservation of the community should be focused on more completely in order to save this historic resource.

Thank you,

Marissa Rodrigues  
mlrodrigues@csupomona.edu  
408.568.1662

La Conexion Wyvernwood Development Project Proposal.pdf  
15587K



# la conexión

wyvernwood garden apartments

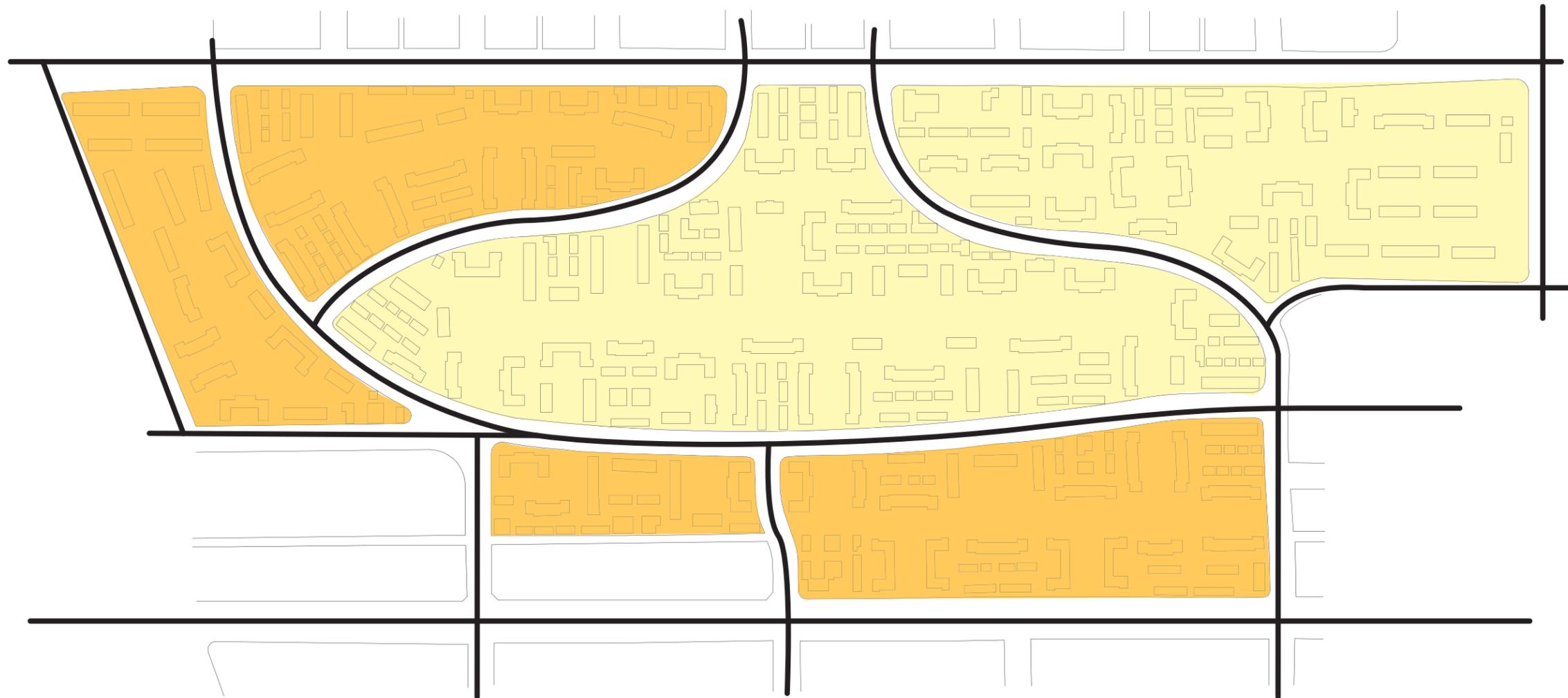
marissa rodrigues  
miguel simental  
adrianna smet

# overall site plan/sitio general

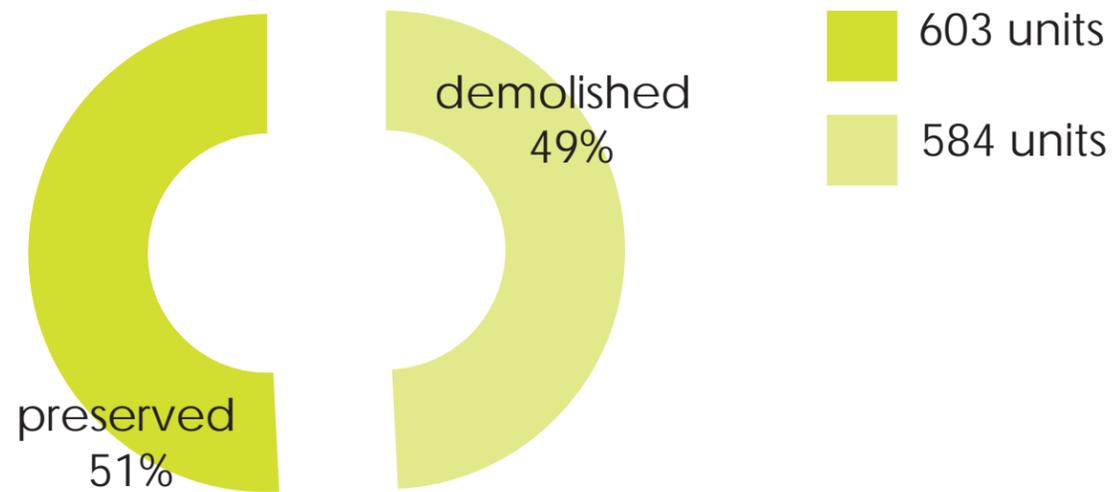


# preservation plan/meta de preservación

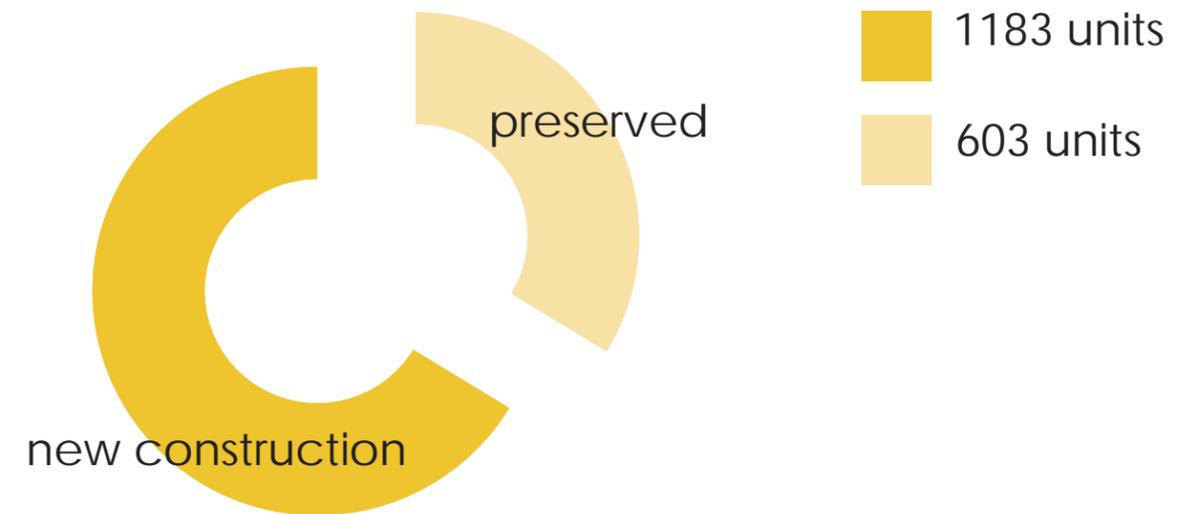
-  preserved buildings/edificios preservados
-  proposed new development/nuevo desarrollo



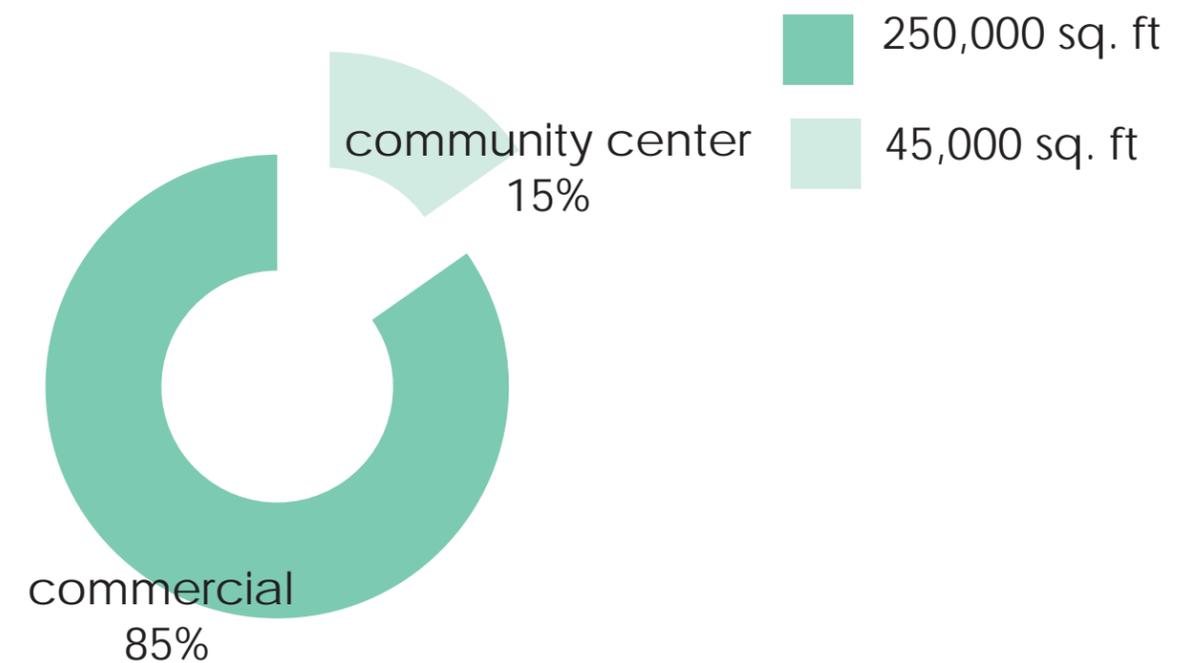
# preservation tabulations/datos de preservación



preserved vs. demolished buildings  
unidades preservados vs. demolidas



new unit construction  
nuevo desarrollo



commercial/community development  
desarrollo comercial y comunidad

# preservation goals/ metas de preservación

## Existing

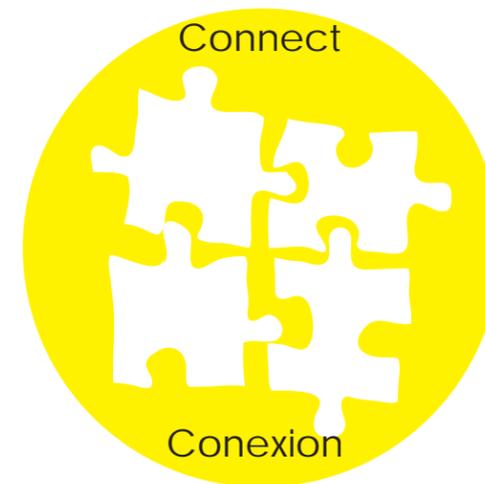
### open space:

total: 36.4 acres  
7.5 acres of this total occur in areas being  
redeveloped



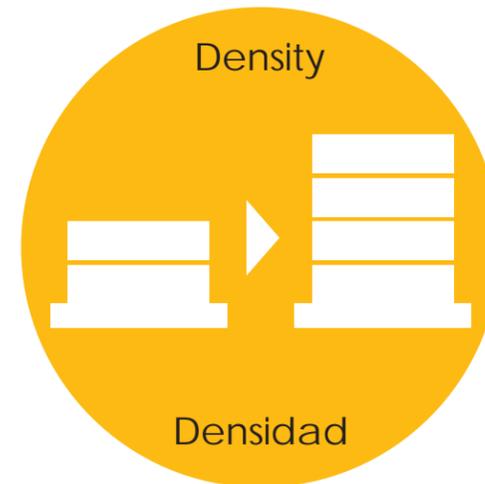
### central spine:

-connecting space running through site



### density:

-existing: 16 units/acre



## New

### open space:

total: 35.4 acres  
net loss of 1 acre

### central spine:

-using open space to connect new devel-  
opment and existing

### density:

-proposed: 26 units/acre

# key factors site organization/organizacion de sitio



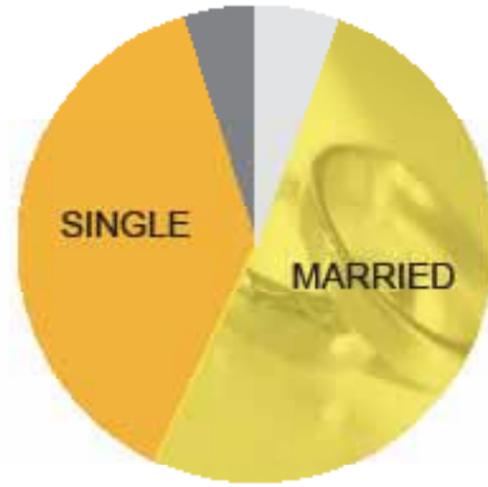
# key factors demographics/demografia



**BOYLE HEIGHTS**



**LOS ANGELES**



**RELATIONSHIP STATUS**



**AVERAGE HOUSEHOLD SIZE**

- 14,229 people per square mile
- Among the highest densities for the city of Los Angeles
- Among the highest densities for the county
- Family oriented
- Above average household size

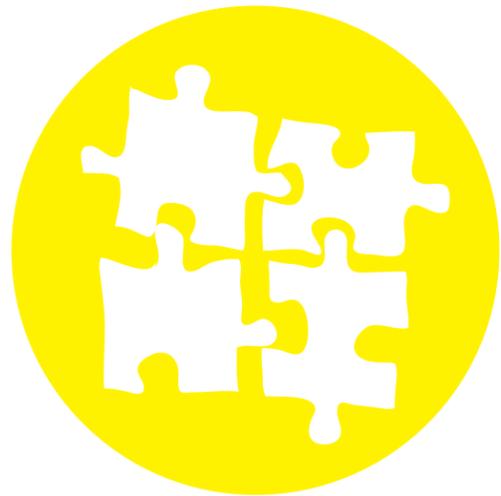


# key factors overall goals/metastotal



## OPEN SPACE

PRESERVE EXISTING CHARACTER OF OPEN SPACE  
ORGANIZE NEW DEVELOPMENTS AROUND OPEN SPACE  
ADD OPEN SPACE TO NEW CONSTRUCTION



## CONNECT

CREATE CONNECTIONS WITHIN AND BEYOND THE COMMUNITY  
CREATE CONNECTIONS BETWEEN DENSITIES



## DENSITY

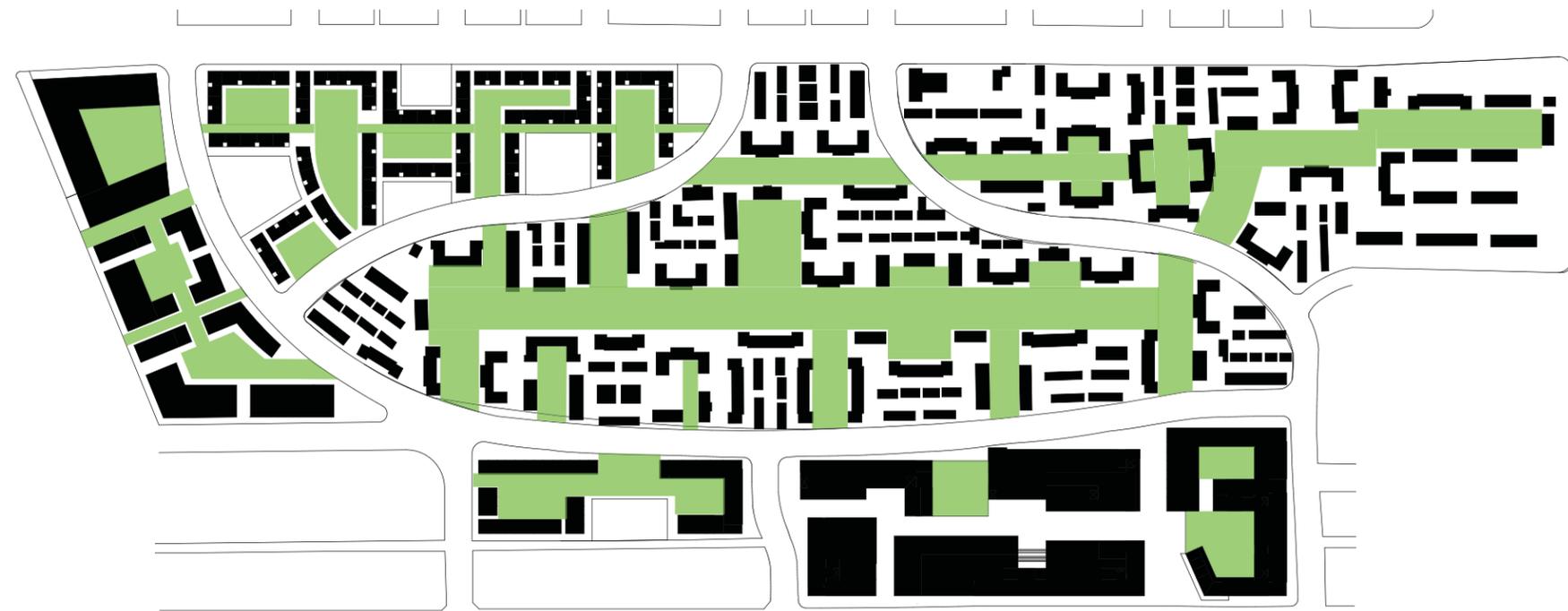
INCREASE THE DENSITY OF THE NEW DEVELOPMENTS  
PRESERVE CHARACTER OF WYVERNWOOD



# key factors open space/campo abierto



existing major open space

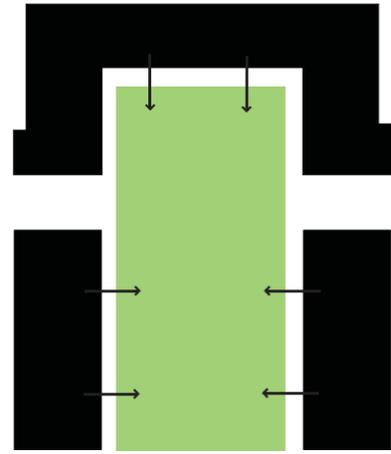


proposed major open space

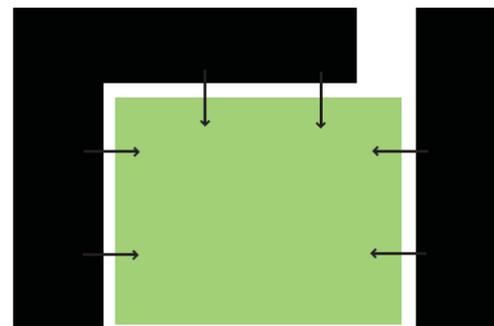
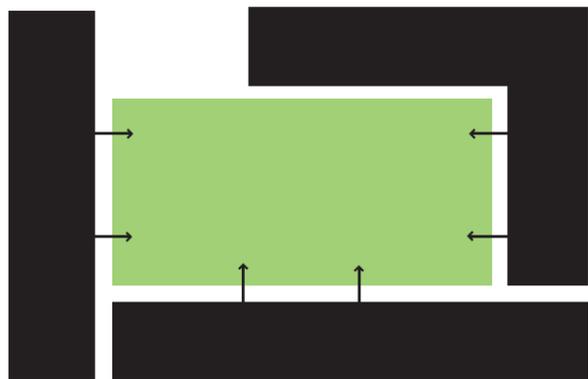
## open space characteristics

- same proportion and scale as existing
- extension of existing paths
- buildings organized around open space

# key factors open space/campo abierto



existing courtyard building orientation



proposed courtyard building orientation

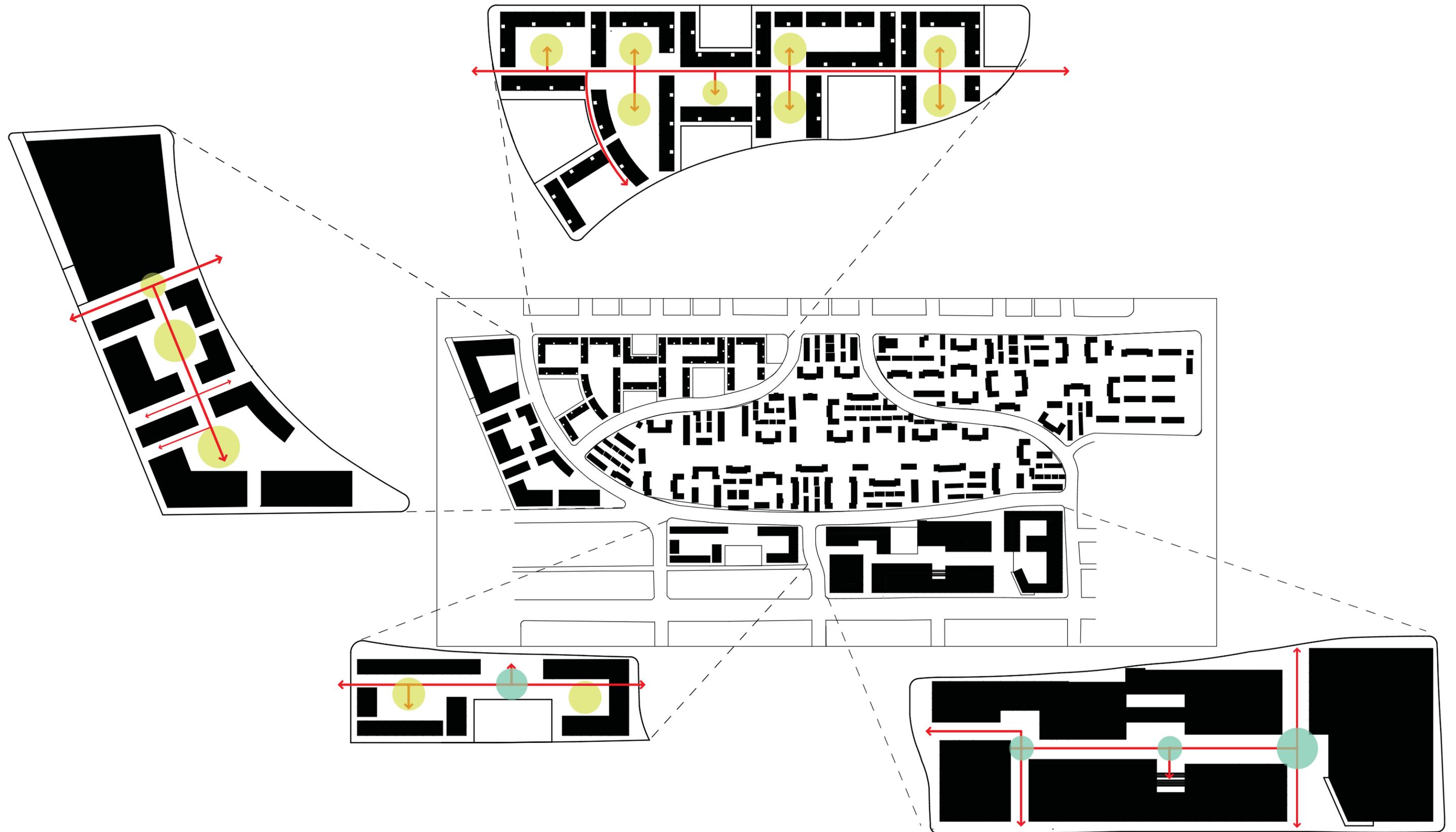


live/work courtyard



medium density courtyard

# key factors connections/conexiones



# key factors vehicular access/acceso de vehiculos



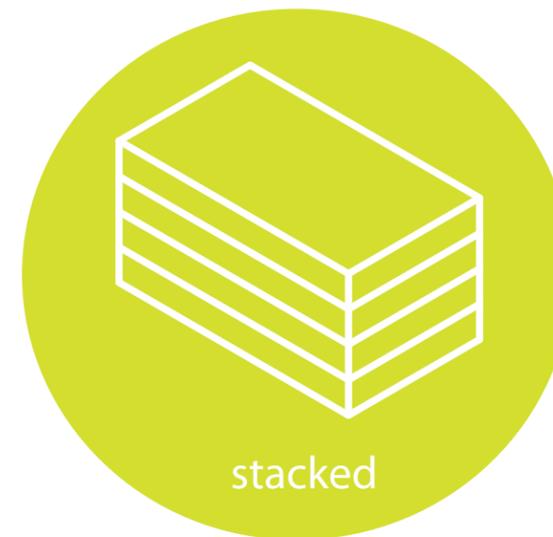
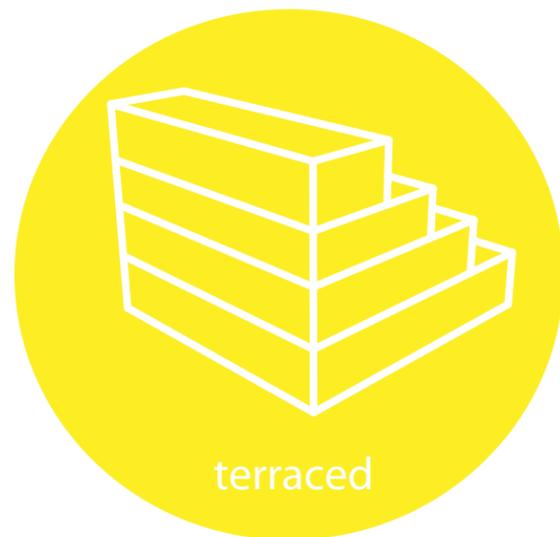
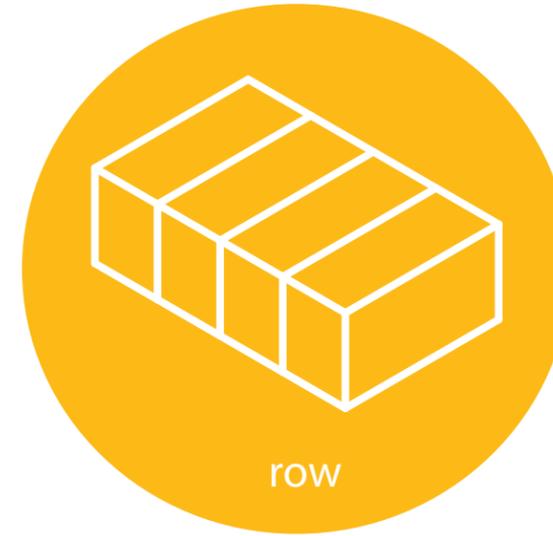
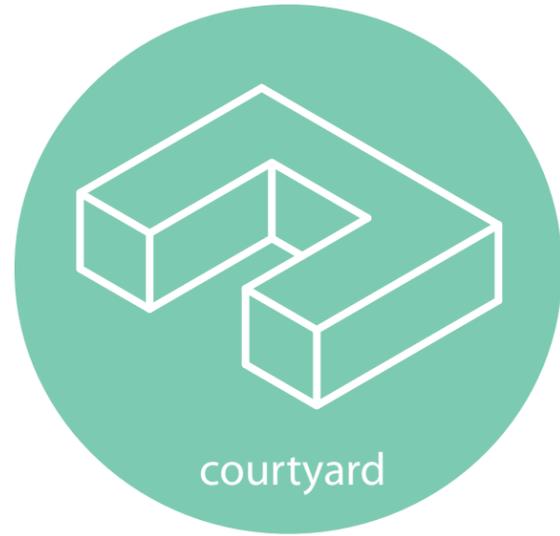
circulation

 / Unit = 2374 Parking  
housing requirements

 / 300sq ft = 950 Parking  
retail requirements

parking requirements

# key factors building typologies/ tipologia de edificios



# landscape goals/metastas de jardín

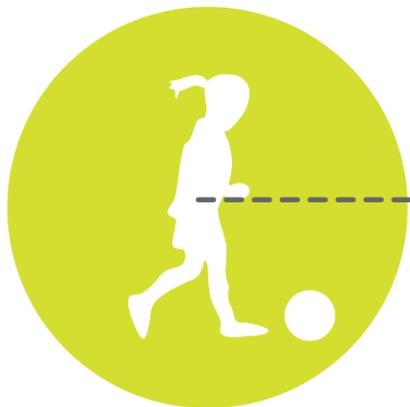
## landscape goals



create spaces for gathering

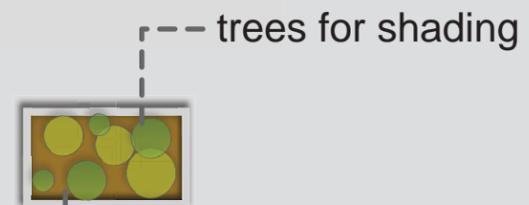
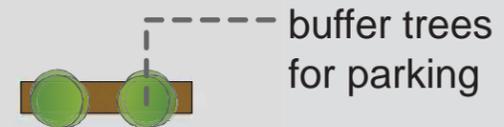


create pedestrian oriented walkable spaces



create usable open spaces including play areas

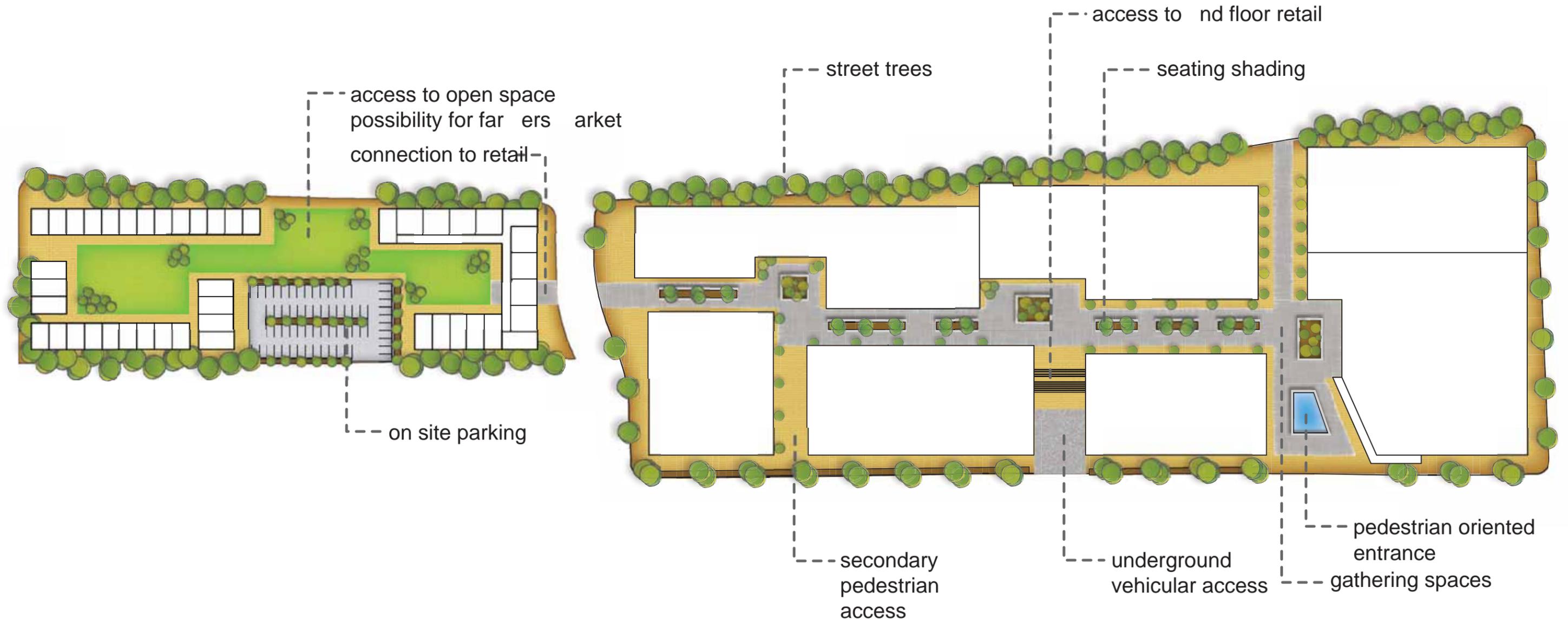
## landscape elements



benches for seating



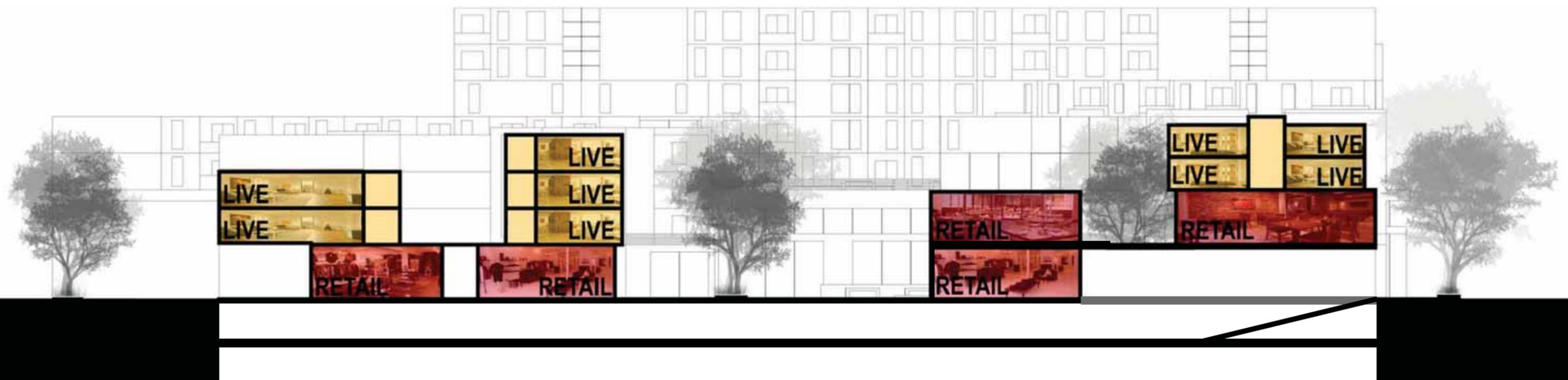
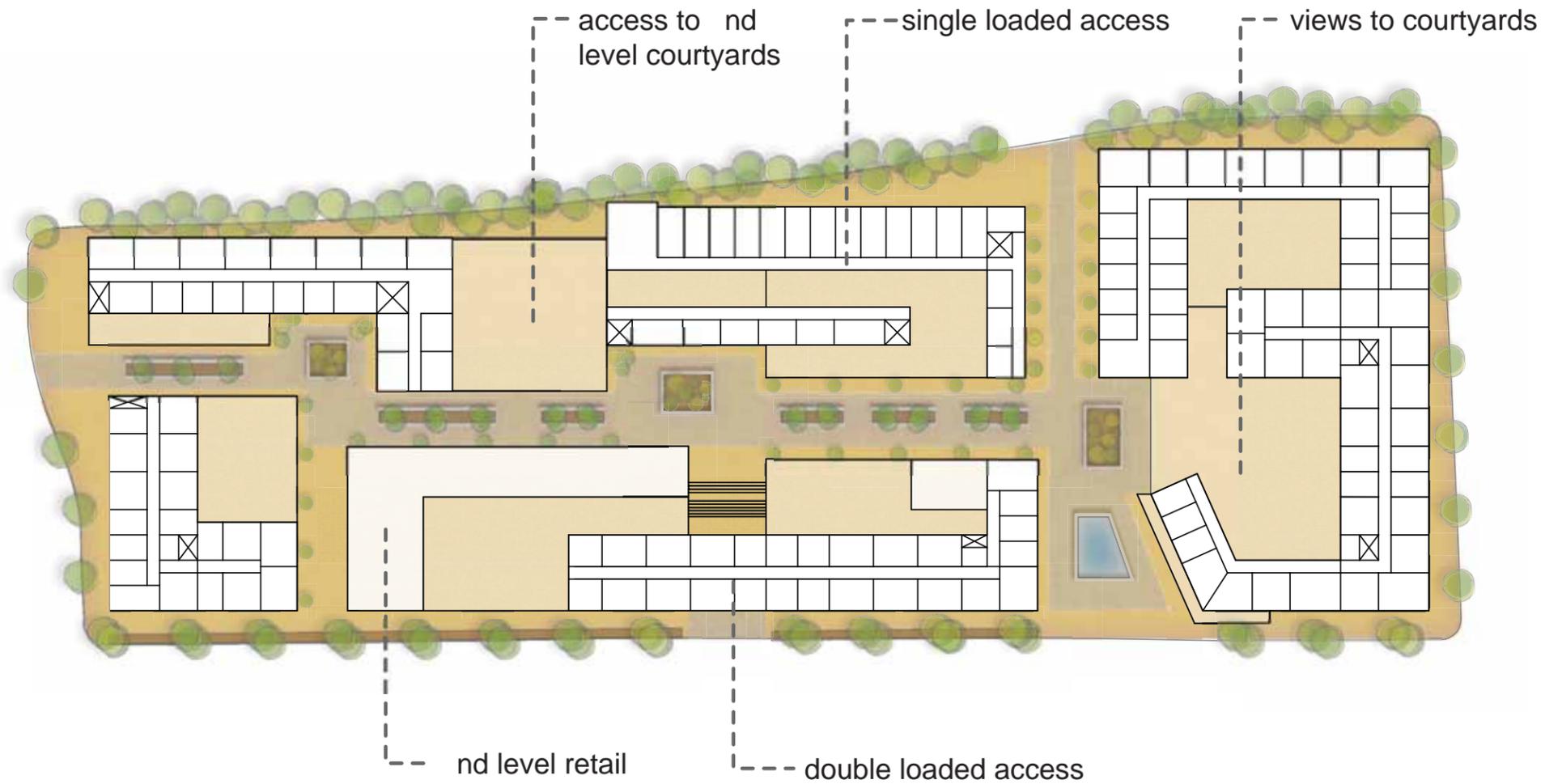
# landscape commercial/ metas de jardín comercial



perspective commercial/ perspectiva de comercial



# landscape second floor mixed use/uso mezclado en segundo piso



perspective second floor mixed use/uso mezclado en segundo piso



# landscape high density\_soto st./ densidad alta



perspective high density\_soto st./densidad alta



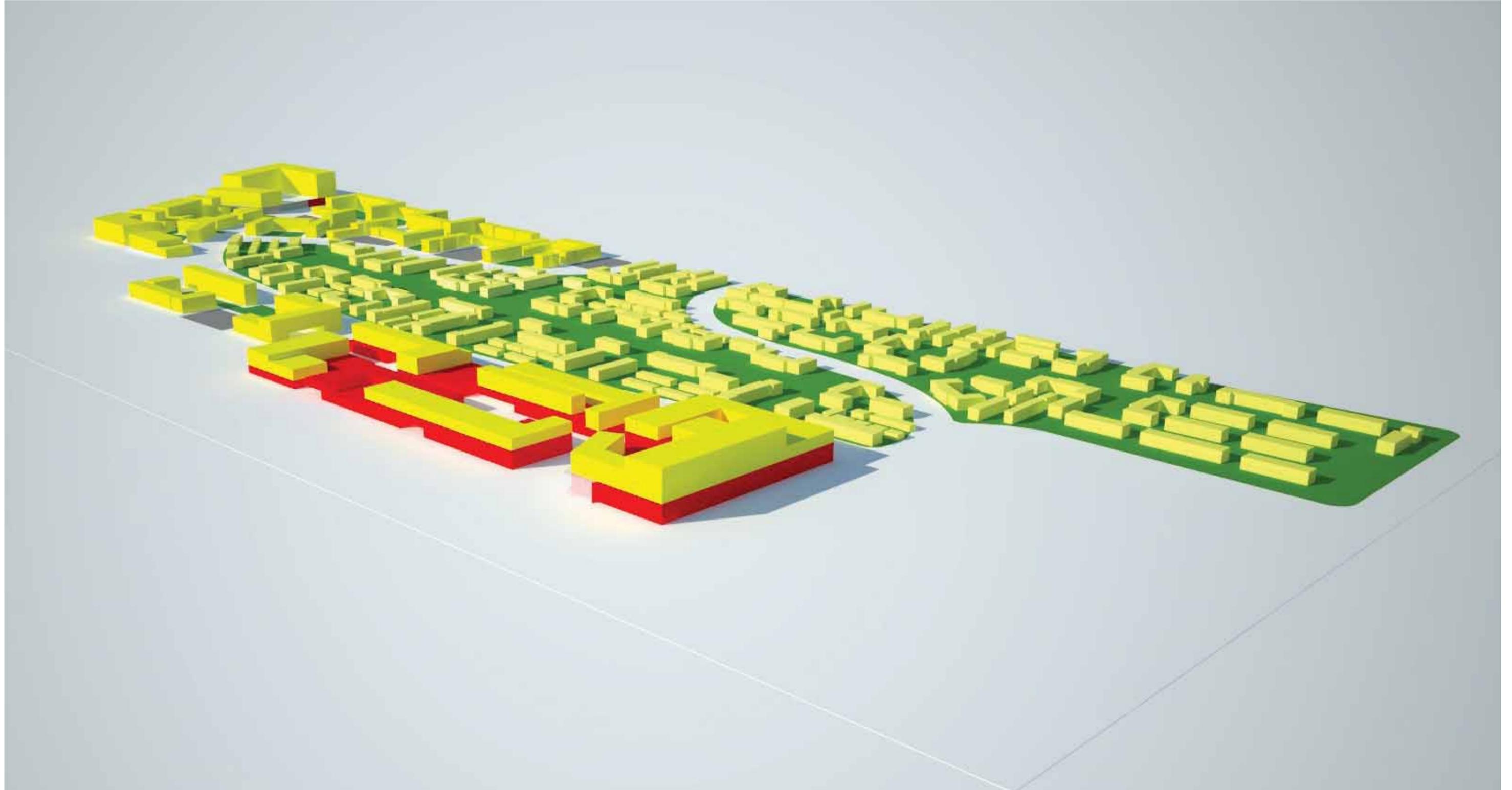
# landscape medium density\_8th st./densidad mediana



# perspective medium density\_8th st./densidad mediana



# overall land use/ uso del sitio general



# tabulations overall/datos general

final unit count/  
unidades total

final density/  
densidad total

final open space/  
total campo abierto

demolished units/unidades demolidas: 584 (49%)  
added units/unidades agregadas: 1183  
total unit count: 1786

26 units/acre

35.4 acres (net loss of 1 acre/  
perdida neta -1 acre)



Letter No. 71



Sergio Ibarra <sergio.ibarra@lacity.org>

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## Wyvernwood Garden Apartments.

1 message

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**Scott A. Ross** <scottr@its.caltech.edu>

Tue, Jan 17, 2012 at 9:56 AM

Reply-To: scottr@caltech.edu

To: Sergio.Ibarra@lacity.org

Mr. Ibarra

Please do not permit the Wyvernwood Garden Apartment complex be destroyed.  
Their architectural and cultural-historical importance to the community  
surely provides sufficient reason to preserve them!

Sincerely,  
Scott Ross

Letter No. 72



Sergio Ibarra <sergio.ibarra@lacity.org>

---

## Save Wyvernwood

1 message

---

Michael Rotcher <michaelrotcher@hotmail.com>

Wed, Dec 14, 2011 at 5:39 PM

To: sergio.ibarra@lacity.org

**The EIR should evaluate a greater range of viable preservation alternatives that retain Wyvernwood's eligibility as a historic district. Wyvernwood's existing buildings can be sensitively upgraded to address the project's sustainability goals and objectives.**

Michael Rotcher

---



Sergio Ibarra <sergio.ibarra@lacity.org>

---

## Comment on Wyvernwood DEIR

1 message

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**Sanders, Mike R (5122)** <mike.r.sanders@jpl.nasa.gov>

Wed, Dec 14, 2011 at 4:43 PM

To: "Sergio.Ibarra@lacity.org" <Sergio.Ibarra@lacity.org>

Sergio Ibarra,

I am an engineer at the Jet Propulsion Lab and was born and raised in Pasadena Ca. I value Greenery, families and vintage architecture. Children need a place to play! We have enough places to shop, corporations have plenty of opportunities to make money. Lets give families a chance to grow. Perhaps you could find money to put in more landscaping and beautify the property even more.... that would be a great idea.

Thank you for listening to me.

Mike Sanders

---



Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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## Wyvernwood

1 message

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**Aram Saroyan <saroyancompany@earthlink.net>****Wed, Jan 18, 2012 at 8:46 AM**

To: Sergio.Ibarra@lacity.org

Hello, Attention Sergio:

I am an 11 year resident of Village Green.

I wholeheartedly agree with everything in the letter from our Board here at Village Green re Wyvernwood--its importance and the need for its preservation.

I'd like to personally add that one of the most impressive things (in my experience) about the human-scaled, nature-oriented, social amenities (right at hand) lifestyle that our communities were carefully and brilliantly designed to provide is how well the original design serves all ages and stages and types of lives. The community cohesion and sheer satisfaction of living in these environments greatly enhances social stability among the residents. This is especially precious and valuable in the urban setting that is Los Angeles, and a huge contribution to the social fabric of the city. This is one of the main reasons that people feel passionately about these Garden Cities. It's not even so much about the historic significance (though this is something I myself am passionate about). It's really about a very rare daily life experience. This was the overriding objective of the planners, they were very successful in achieving it--and society can learn a lot from studying these breakthrough designs. This social aspect of the design has never been better achieved than it was, and continues to be, in these valuable historic beacons for sanity and satisfaction in the often chaotic, profit driven reality that is Los Angeles (and all other urban centers.) Best, Gailyn Saroyan

--

Aram Saroyan  
5482 Village Green  
Los Angeles, CA 90016  
(323) 496-0927

--

Aram Saroyan  
5482 Village Green  
Los Angeles, CA 90016  
(323) 496-0927  
E-mail: [saroyancompany@earthlink.net](mailto:saroyancompany@earthlink.net)  
Website: [www.aramsaroyan.com](http://www.aramsaroyan.com)



Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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## Wyvernwood preservation: Attention Flora

1 message

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**Aram Saroyan** <saroyancompany@earthlink.net>

Tue, Dec 13, 2011 at 2:13 PM

To: Sergio.Ibarra@lacity.org

Hello, (Attention Flora):

I am an 11 year resident of Village Green.

I wholeheartedly agree with everything in the letter from our Board here at Village Green re Wyvernwood--its importance and the need for its preservation.

I'd like to personally add that one of the most impressive things (in my experience) about the human-scaled, nature-oriented, social amenities (right at hand) lifestyle that our communities were carefully and brilliantly designed to provide is how well the original design serves all ages and stages and types of lives. The community cohesion and sheer satisfaction of living in these environments greatly enhances social stability among the residents. This is especially precious and valuable in the urban setting that is Los Angeles, and a huge contribution to the social fabric of the city. This is one of the main reasons that people feel passionately about these Garden Cities. It's not even so much about the historic significance (though this is something I myself am passionate about). It's really about a very rare daily life experience. This was the overriding objective of the planners, they were very successful in achieving it--and society can learn a lot from studying these breakthrough designs. This social aspect of the design has never been better achieved than it was, and continues to be, in these valuable historic beacons for sanity and satisfaction in the often chaotic, profit driven reality that is Los Angeles (and all other urban centers.)

Best,

Gailyn Saroyan

--

Aram Saroyan

5482 Village Green

Los Angeles, CA 90016

(323) 496-0927

E-mail: [saroyancompany@earthlink.net](mailto:saroyancompany@earthlink.net)

Website: [www.aramsaroyan.com](http://www.aramsaroyan.com)

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**Letter No. 76**

Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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## Wyvernwood

1 message

**Deborah Schankler <dschankler@comcast.net>****Mon, Jan 16, 2012 at 5:12 PM**

To: Sergio.Ibarra@lacity.org

Cc: Deborah Schankler &lt;dschankler@comcast.net&gt;

Hello Mr. Ibarra:

It is difficult to be against new development when they make it look sooo good on their website. Testimonials and everything. I think most people who are concerned about the quality of life for people in Boyle Heights and in Wyvernwood are having a real difficult time with the density and the ratio of people to open space, light, and air. People who live there choose to live there for certain important reasons. Location, access, community, open space, history, and so on...

Why haven't the owners put in updated landscaping and trees before this time. Why haven't they created more parks within the open spaces for some specific uses based on perceived needs of the residents? Like city parks do in many places. Why haven't the buildings and mechanicals been maintained even better than this? Anyone with eyes can see what it looks like now in person or on google earth. Look at those sad little foundation plantings. Come on. Furthermore, as we have seen in other states, like Michigan - Sometimes developers promise a lot of things before the deal is made. Then they have a million excuses why it cannot happen or they cannot do it. Do you know how much it costs to buy and plant just one king palm as pictured in their sketches of the new development?

Beware - all that glitters may not be gold in this situation... Debby Schankler, Okemos, Michigan

PS Yes, I have relatives that live in Los Angeles, the city, not the Malibu or Orange County areas!

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# Re: File Number ENV-2008-2141-EIR Wyvernwood Garden Apts.

1 message

Floself@aol.com <Floself@aol.com>

Mon, Jan 9, 2012 at 4:54 PM

To: Sergio.Ibarra@lacity.org

Cc: fchou@laconservancy.org

**Re: File Number ENV-2008-2141-EIR**

Dear Mr. Ibarra:

I am in favor of preserving Wyvernwood. Call me anti-progress, but anything that is already standing, that fosters community, ease of getting around -- and green grass, trees, and blue sky, instead of concrete, gets my vote!

I am pasting the LA Conservancy's talking points here because I agree with them. Thank you.

Flo Selfman

Los Angeles,

[floself@aol.com](mailto:floself@aol.com)

323.653.4555

► **Wyvernwood is a significant historic place.**

Opened in 1939 and spanning nearly seventy acres, Wyvernwood was the first large-scale garden apartment development in Los Angeles. It was [hailed as a major achievement](#) when built, and its innovative design has [fostered a thriving community](#) for generations.

Wyvernwood is listed as a historic district in the California Register of Historical Resources, and it is eligible for the National Register of Historic Places. Every effort should be taken to avoid the complete demolition of a designated historic district.

► **Large-scale garden apartments in Los Angeles and across the nation have been successfully rehabilitated and preserved.**

Village Green and Lincoln Place are just two examples of [other garden apartment communities](#) that have successfully addressed ways to rehabilitate their historic buildings and still provide a reasonable return on investment.

► **The draft EIR contains narrowly defined project objectives that favor new construction over preservation.**

An overly narrow definition of project objectives undermines the purpose of the California Environmental Quality Act (CEQA) by precluding consideration of less harmful alternatives.

**The EIR should evaluate a greater range of viable preservation alternatives that retain Wyvernwood's eligibility as a historic district.**

Only one preservation alternative (Alternative C) was considered that attempts to meet project objectives and still maintain eligibility as a historic resource for the purposes of the California Environmental Quality Act (CEQA).

► **Wyvernwood's existing buildings can be sensitively upgraded to address the project's sustainability goals and objectives.**

Wyvernwood is as capable as the preferred plan of providing sustainable design features, through rehabilitation of existing buildings that were designed with abundant natural light, fresh air, and green open spaces. For even the greenest new buildings, the environmental impacts of new construction are immense on a site of this size. It will take decades to pay off the costs to the environment in terms of energy, carbon, water, materials, toxicity, etc.

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Letter No. 78



Sergio Ibarra <sergio.ibarra@lacity.org>

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## Wyvernwood

1 message

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**Nicholas Shambro** <shambro3@earthlink.net>

Wed, Dec 14, 2011 at 4:42 PM

To: Sergio.Ibarra@lacity.org

Cc: fchou@laconservancy.org

Hello:

As a lifelong resident of Los Angeles, (I'm told that's called a native) I've seen many changes in our wonderful city.

Some made things better others not so nice.

We have an opportunity to make our city nicer by rehabilitating this community rather than replacing it with a less appealing "cookie cutter" designs.

Please consider helping us save just a bit of our beautiful heritage by considering other "out of the box" designs and solutions

for this historic resource.

Future generations will thank you.

And we'll all have a nicer city in which to reside!

Sincerely,

Nicholas Shambro

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**Letter No. 79**



**Sergio Ibarra <sergio.ibarra@lacity.org>**

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**(no subject)**

1 message

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**Denise <denise@easyproto.com>**

**Tue, Jan 17, 2012 at 4:52 PM**

To: Sergio.Ibarra@lacity.org

Dear Hon. Ibarra,

In regards to the Wyvernwood Garden Apartments... Do we really need another mixed use development plan to replace our historic dwellings? Please preserve the garden apartments and continue to make our city beautiful and historic. Several years ago I met a woman who lived in the apartments who told me how special a place it is. She is probably there still. Please, please keep our special places in our city alive and restore special buildings instead of demolish and replace.

Sincerely,  
Denise Smith

Letter No. 80



Sergio Ibarra <sergio.ibarra@lacity.org>

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## Preservation of Wyvernwood

1 message

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**Joshua Steele** <jjsteele@sbcglobal.net>

**Fri, Dec 16, 2011 at 6:08 PM**

To: sergio.ibarra@lacity.org

Dear Mr. Ibarra,

I am writing to ask that you support the preservation of the historic Wyvernwood Gardens apartments in Boyle Heights, which were built in 1939. Wyvernwood Gardens is one of several historic garden apartment buildings in the City of Los Angeles that are still occupied. Other historic garden apartment complexes, such as Village Green in Baldwin Hills and Chase Knolls in Sherman Oaks have been designated as historic-cultural structures, and the same should apply to Wyvernwood Gardens.

Thank you.

Sincerely,

Joshua Steele

11641 Valley Spring Lane #108

Studio City, CA 91604



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## My Support

1 message

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**Marcia Thelemaque** <marciathelemaque@ca.rr.com>

**Mon, Dec 12, 2011 at 9:07 PM**

To: Sergio.Ibarra@lacity.org

Hi folks,

I live in the Village Green in Los Angeles, and the thought of losing any beautiful garden village to demolition makes me angry and very, very sad. I certainly hope your stance, and the support of people around the city, will put a stop to this type of insensitive and greedy destruction of Wayvenwood.

God bless you all.

Marcia Thelemaque

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Letter No. 82
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Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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**Re: Wyvernwood Gardens, File #ENV-2008-2141-EIR**

1 message

**Kay Tornborg <kxiaojie@att.net>**

Wed, Jan 18, 2012 at 2:32 PM

To: sergio.ibarra@lacity.org

Cc: fchou@laconservancy.org

It is time for the City to recognize the many benefits of historic preservation, one of which is the sense of a thriving community for a largely immigrant population that could be de-stablized in the face of corporate "improvements" that will destroy and replace the sense of context and safety engendered by time.

The negative impact will be felt not only in the Wyvernwood complex but throughout the neighboring areas.

The process of declaring a site 'historic' is not a simple one and should not be thrust aside for a 'better deal.' History has its own importance and could be capitalized on to bring tourists, which would aid in revitalization of the area and help bring it into the mainstream.

If the duly-elected Councilman, who is in possession of all the facts, thinks it's a bad idea to tear down Wyvernwood, IT'S A BAD IDEA.

Kay Tornborg  
Historic Home Owner, Hollywood

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**Letter No. 83**

Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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**File Number ENV-2008-2141-EIR**

1 message

**TW <teotwawki23@yahoo.com>****Fri, Dec 16, 2011 at 12:28 AM**

Reply-To: TW &lt;teotwawki23@yahoo.com&gt;

To: "Sergio.Ibarra@lacity.org" &lt;Sergio.Ibarra@lacity.org&gt;

Cc: "fchou@laconservancy.org" &lt;fchou@laconservancy.org&gt;, "tstrat002-ckrna@yahoo.com" &lt;tstrat002-ckrna@yahoo.com&gt;

Sergio,

I would like to offer my comments on the DEIR concerning redevelopment of the Wyvernwood Garden Apartments as a native and life-long resident of Los Angeles. I am also the son of a native Angeleno who spent his life as an architect, and who was intimately involved with many of the now historic buildings in this city – buildings that, at one time or another, were threatened with destruction because developers were only interested in money. I'm happy to say that almost all of those buildings are still around, and they define Los Angeles – the Cinerama Dome, now re-integrated into the very successful Arclight Theatre Complex; the Capital Records Building, still under threat of conversion but at least with physical preservation; the Music Center, one of the icons of downtown; Century City, the symbol of the mid city, and on and on. Although you are assessing environmental impact, I will address emotional and historical impact – which are, after all, part of the human environment in which we live.

Yes, it is necessary for a city to grow and develop, and Los Angeles has certainly grown up since I was a child. But it is also necessary for a city to remember and preserve its history, and in this aspect, Los Angeles is mostly a failure. Go to New York, Boston, Philadelphia, and you can see modern skyscrapers standing next to 18<sup>th</sup> Century landmarks, both existing in harmony and creating a unique character. Even in California, San Francisco is remarkable for having preserved so much of its Victorian era buildings (despite the city nearly being destroyed in 1906), and it too has a special character all its own. In Los Angeles? Apparently, our idea of a landmark is a mall tossed up in the 80s, anything older be damned. This is a national embarrassment, and it has only been through the efforts of dedicated preservationists that things like Olvera Street, Ravenswood, many downtown landmarks of the 30s, and the like are still around. Otherwise, all would have passed under developer's bulldozers, been plowed into dust and replaced with shiny, identical, anonymous condos.

Or maybe not replaced. I have another reason to be very involved with saving Wyvernwood Garden, and it's this. I am currently a resident of Chase Knolls Apartments, and if you're not familiar with it you should take a few moments to learn its history. Built in 1946 on a former dairy farm donated by its owner (who also donated the land that became Notre Dame High School), it was threatened with demolition in the 90s. The tenants fought back and fought back hard. It is now an historical landmark, fourteen acres dotted with the oak trees that gave Sherman Oaks its name. It is a community, and it coexists with the modern developments around it. It is home to a few hundred people. If the developers had had their way, those few hundred people would have had to pack up and leave. If the developers had had their way, these fourteen acres would now be covered with a cookie-cutter glass and wallboard box with no personality. If the developers had had their way, there would no longer be a community on Riverside, between Fulton and Sunnyslope.

Now, how did I come to live at Chase Knolls? Well, I used to live in North Hollywood. I lived there for nearly a decade. Then, one day, a developer swooped in and bought two large apartment complexes, one door down from where I lived. They promised bright, shiny condos, marvelous redevelopment, and on and on. They tore down those apartments, evicted several hundred people, and... nothing happened. They created a great, gaping hole on the street where I lived – they created a brushy, vacant lot strewn with broken glass and shattered dreams that is still empty to this day, six years later. I moved out of my old neighborhood because developers, only interested in money, ripped the heart out of it and made it unlivable. One of the complexes they tore down was built about the same time that Chase Knolls was. It was a perfectly wonderful building, home to many people. Now? It's nothing. They turned a nice neighborhood into a ghetto with three hundred feet of chain-link fence separating what looked like a war zone from the rest of the neighbors.

Now, don't get me wrong – some redevelopment is good; in fact it's excellent, when it's done in the right way. The North Hollywood Metro developments are a perfect example. Underutilized commercial and industrial property around a transportation hub was built up for mixed-use commercial and residential purposes, and it has been a boon to the area. The same is true of all the projects tied to the Metro, particularly in Hollywood, but they have one thing in common. They did not destroy existing residential property to achieve their purposes. They did not displace residents but, rather, created new places for new residents. And, in many cases (the Hollywood and Vine corridor is a perfect example) they preserved existing street-level businesses while building up and out from those core buildings.

The argument to save the fourteen acres of Chase Knolls, built in 1946, was successfully made two decades ago. Wyvernwood, five times as large and seven years older, is even more worthy of preservation, especially because it was built in 1939, the *anno mirabilis* of Hollywood, but particularly because it is home to multiple generations of Angelenos who should not be displaced from their homes just because some developer thinks he can bulldoze history into the Earth and make more money off of a bland, uninteresting, glass and concrete monstrosity.

If you want to measure the true environmental impact of destroying a place like Wyvernwood, just talk to the people who live there. Then ask yourself this: what would you think if a developer decided that your home needed to go away so that they could toss up another Starbucks or McDonalds or strip mall? When it gets personal, the environmental impact becomes pretty enormous, doesn't it?

As a second-generation Angeleno, I am offended by the constant destruction of the history of my city. As the son of an architect who created a lot of it, I am doubly offended. Unless and until the developers can create a plan that preserves Wyvernwood, lets the residents stay, and builds a community around the community that is already there, I strongly urge you to reject any and all plans they have submitted.

Thank you for your consideration.

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## File Number ENV-2008-2141-EIR / Wyvernwood

1 message

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**Staci Valadez** <stacivaladez@yahoo.com>

Fri, Dec 9, 2011 at 1:48 PM

Reply-To: Staci Valadez <stacivaladez@yahoo.com>

To: "Sergio.Ibarra@lacity.org" <Sergio.Ibarra@lacity.org>

Hello,

I've been an Angelino for much of my 28 years of existence. My parents and grandparents are also long time residents of Los Angeles. It has always been very important to do what we could in order to preserve the history of this great city. Unfortunately as wonderful as this county is, it also seems to be one of the few counties of its size that care so little about historic preservation. We have seen so many wonderful historic locations torn down, and usually for reasons involving greed shadowed by an excuse of communal growth. As many big US cities and numerous countries around the world have shown us, it is possible to do both. Wyvernwood is an important landmark to the people of LA, there are close to NO complexes with such a unique structure anymore, please consider this while making your decision in regards to this precious land. Help us safe guard what is left of our architectural history. Thank you for your time.

Staci Valadez

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To whom this may concern:

My name is Olivia Vences. I am a neighbor to Wyvernwood and I live on 8<sup>th</sup> St. I support this project to the fullest and I think it is going to better the community. This project is going to create more jobs to unemployed people in need, better safety and protection, and parks that is a big factor here at Wyvernwood which is desperately needed. Residents need more security because of all the vandalism. They also need new, better apartments not repaired and old. I hope this project gets approved by the Planning Department of the City of Los Angeles for the best of Wyvernwood. Thank you.

Sincerely,

Olivia Vences  
E. 8<sup>th</sup> St.  
Los Angeles, LA. 90023

J.E.



Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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## Wyvernwood Garden Apartments

1 message

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**Robert Vogt** <robertvogt@hotmail.com>**Thu, Dec 15, 2011 at 9:33 AM**

To: sergio.ibarra@lacity.org

Sergio,

I am writing to you to request that you do whatever you can to preserve the Wyvernwood Garden Apartments from being demolished or destroyed. I have lived in Washington, DC and NY where there is a strong interest in preservation of commercial and residential properties. When I moved out to LA almost 15 years ago, I was dismayed at the way Southern CA allowed historic or significant structures to be destroyed. I think Wyvernwood Garden Apartments qualifies as such and hope you will do what you can to preserve the significance and uniqueness of this complex. Other cities have taken complexes of similar significance and ensure that the complexes are preserved. I live right up the hill from Village Green which has been beautifully preserved and I hope you can do the same for Wyvernwood. It would be a tragedy to let this complex be destroyed and replaced. Please help preserve this landmark.

Thanks much for your consideration,

Bob Vogt  
323-295-2901

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Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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## Wyvernwood

1 message

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**Shelley Wagers** <shelley@wagersmail.net>

Mon, Jan 16, 2012 at 2:05 PM

To: sergio.ibarra@lacity.org

Cc: fchou@laconservancy.org

**Wyvernwood is a significant historic place.**

Wyvernwood is listed as a historic district in the California Register of Historical Resources, and it is eligible for the National Register of Historic Places. Every effort should be taken to avoid the complete demolition of a designated historic district.

**► Large-scale garden apartments in Los Angeles and across the nation have been successfully rehabilitated and preserved.**

Village Green and Lincoln Place are just two examples of [other garden apartment communities](#) that have successfully addressed ways to rehabilitate their historic buildings and still provide a reasonable return on investment.

**► The draft EIR contains narrowly defined project objectives that favor new construction over preservation.**

An overly narrow definition of project objectives undermines the purpose of the California Environmental Quality Act (CEQA) by precluding consideration of less harmful alternatives.

**► The EIR should evaluate a greater range of viable preservation alternatives that retain Wyvernwood's eligibility as a historic district.**

Only one preservation alternative (Alternative C) was considered that attempts to meet project objectives and still maintain eligibility as a historic resource for the purposes of the California Environmental Quality Act (CEQA).

**► Wyvernwood's existing buildings can be sensitively upgraded to address the project's sustainability goals and objectives.**



# Boyle Heights Mixed-Use Community Project, File Number ENV-2008-2141-EIR

1 message

warren wigh <wigh.warren@gmail.com>

Tue, Dec 13, 2011 at 9:19 AM

To: sergio.ibarra@lacity.org

Cc: lghoyos@csupomona.edu, fchou@laconservancy.org

Submitted Electronically

Sergio Ibarra  
City of Los Angeles, Major Projects  
200 N. Spring Street, city Hall, Room 750  
Los Angeles, CA 90012  
[sergio.ibarra@lacity.org](mailto:sergio.ibarra@lacity.org)

Re: Boyle Heights Mixed-Use Community Project, File Number ENV-2008-2141-EIR

Dear Sergio Ibarra:

I am writing to submit comments on the need for further review and consideration of additional preservation alternatives for the Boyle Heights Mixed-Use Community Project. As a 4th year undergraduate of architecture at Cal Poly Pomona, I have spent the last 10 weeks analyzing the proposed project as part of a studio course, including performing extensive research and analysis on Wyvernwood. Based on my team's project (see attached pdf), we believe there are definitely a variety of alternatives to whole scale clearance of Wyvernwood that have not been fully considered within the DEIR.

Additionally, we think that maintaining Wyvernwood's eligibility as a historic resource can be achieved through feasible preservation alternatives. More analysis is needed and additional preservation alternatives should be considered instead of only Alternative C within the DEIR.

Other mid-to-large-scale garden apartments throughout Los Angeles have fostered strong, stable communities, in large part because of their design (ex: Village Green). The proposed project and preferred alternative will effectively destroy a historic resource and thriving community. Wyvernwood can be saved and rehabilitated with residents in place to address the perceived deficiencies without resulting in the full scale demolition of the entire site and displacement of residents.

As students of architecture and most of all, as citizens, we implore that alternatives be considered before any action is taken. Our attached pdf shows a general outline and site plan of the study we have done on location and a proposed alternative. If we as students could come up with a 55% utilization factor of Wyvernwood, there is no reason why other alternatives can achieve the same or even better

results of preserving Wyvernwood.

Thank you for your time and consideration.

Sincerely,  
Warren Wigh  
Cal Poly Pomona Architecture 2013



**Project Overview.pdf**

3120K

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# Housing by the Numbers

Total Units without demolition- 1187

Total Unidades Preservados- 1187

Modified plan C preserves 648 units, demolishes 539 units.

-Savings of 55%.

55% de lo existente preservado

1200 new units are added

1200 nuevas unidades adicionados

1848 total units

1848 unidades en total

661 unit net gain

661 unidades de ganancia

26.8 units per acre

26.8 unidades por acre

31.5 acres of open space

31.5 acres of open space

Projected revenue increase of 65%

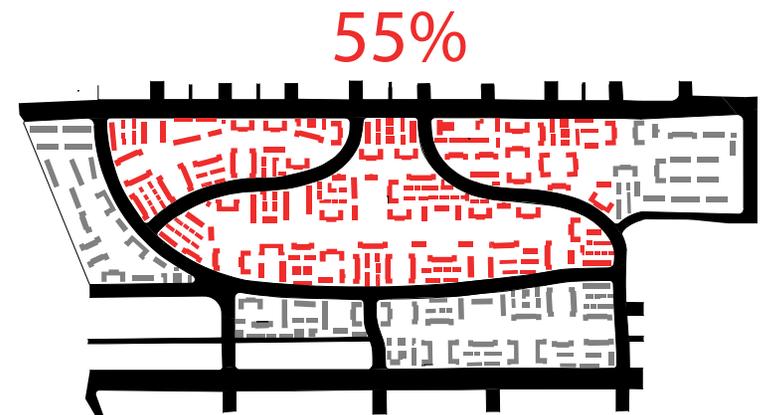
Aumento de 65% de pronosticado ingresos

Centralized commercial space totalling 260,375 S.F.

Total de centro comercial espacio 260,375 pies cuadrados

2 parking spaces provided per unit

2 estacionamientos por unidad



PRESERVATION PLAN



Sergio Ibarra

Ciudad de Los Angeles, Grandes Proyectos

200 N. Spring St. Ayunamiento, sala 750

Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

DEC 29 2011

ENVIRONMENTAL  
UNIT

Dear Sergio Ibarra,

I am writing to inform you that I have read the "Proyecto Comunitario de Uso Mixto Boyle Heights" plan.

And I do not support this project because of the following reasons. First of all, the smog here is already

very high and building new things and commercial center will only cause more smog. Second the traffic

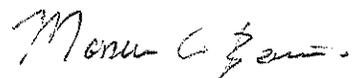
will only increase more. The traffic during the afternoons is unbearable; to get from one street to

another you have to spend quite some time with all the cars that are there and adding more families

and stores means more cars. Thank you for listening.

Sincerely,

Monica Zermeno





Sergio Ibarra &lt;sergio.ibarra@lacity.org&gt;

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## Wyvernwood DEIR

1 message

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**Arlene Zimmer** <crea\_tech@earthlink.net>**Mon, Jan 16, 2012 at 2:06 PM**

To: Sergio.Ibarra@lacity.org

As a native Angelina whose family has been here for more than 100 years, I have seen, experienced and appreciate the history of our very special city. I believe it is imperative that our historic areas be preserved and rehabilitated. Too many of our cherished communities have been destroyed and, as a result, our treasured memories and

lessons to be shared with family, neighbors and visitors are silenced. Too often, I have driven to areas in which I have lived and shared with family and neighbors, only to find replacements that lack character and will, most likely, never foster the unique and unequalled sense of community that promotes concern and caring for the neighborhood. Wyvernwood deserves and is entitled to the protection and preservation it must receive.

With thanks for your consideration -

Arlene Carlin Zimmer

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Hi nombre es, Maria Garcia,  
y A poyo el proyecto de  
reurbanisacion porque estos  
aportamentos estan muy viejos  
huelen mal, esta lleno de van-  
dalismo, y por estar tan viejo  
todo estamos más expuestos  
a peligro para nuestros hijos  
y el proyecto que estan  
planeando esta muy bien,  
espero que sea pronto, gracias.

3121 Wynwood LN #1  
L.A CA 90023.

~~Flora Santana~~

Estimado Señor Ibarra  
espero mi buen gusto dirijirme  
a usted con el Respeto que se  
merece el objetivo de esta carta  
Es para pedirle su apollo sobre  
el Proyecto que Quiero llevarse  
acabo con el fin de visitar mejor  
mi nombre es Zaira Guerrero  
tengo 32 años viviendo Pero en  
estas años he conocido muchos  
Bosques de cascos asaltos de caminos  
la marketa nuestros hijos para  
que tengan un rato de diversion  
los llevamos al Parque costello donde  
emos tenido que ver enfrentamiento  
de gangas Pero ahora que se nos  
presenta la oportunidad de visitar  
mejor le pedimos que nos de la  
oportunidad de visitar sana mente  
su decision las ponemos en las  
manos de Dios para que este Proyecto  
corra con firme la Voluntad de <sup>Dios</sup> El  
y la suela esperando muy pronto  
se aga Realidd me despido de  
usted y pidiendole a Dios que  
lo guarde en todo momento  
A. S. Zaira Guerrero

Atte. Sr. Ibarra.

La presente es para apoyar el proyecto de reurbanización porque creo que debemos vivir en un lugar mejor, en lo personal creo que mi apartamento necesita un cambio radical, aire acondicionado, pintura nueva, Cocinas nuevas y lo mejor sería hacerlos cimientos nuevos porque los departamentos ya están demasiado viejos y lo peor son las infestaciones de ratas y cucarachas. Yo quiero un lugar mejor para vivir y un lugar mejor para nuestros hijos. ayudenos a brindarles este lugar mejor, muchas gracias, y espero que este proyecto se realice pronto.

Atte. Cristina J  


2843 wynwood Ln.

J.E.

Jose Luis Lomel:

2938 tr.

Mi nombre Jose Luis Lomel.

Me gusta el nuevo proyecto que esta proponiendo el DUEÑO y todos los Beneficiarios que ese proyecto nos ha a dar.

Todo me gusta del nuevo proyecto.

y pienso que seria ~~q~~ mas mejor pronto posible. Todo WYVERNWOOD APT. necesite, no-nuevo Arreglos y sino todo REMPLAZADO.

por Favor de su Aprobacion el departamento de planificacion porque este Cambio si va a hacer de ~~me~~ mucha utilidad para Boyles ~~the~~

hisights. muchas gracias

ATT 

9-26-2011

My name is Magdalena, I support the project of reurbanization because it brings many benefits in work and recreational parks for our children. Also, these apartments are deteriorated and we want something new because here in this community there is a lot of vandalism. I request favor to the planning department that they put different security because the security that is here does not work, and I have lived here for 12 years and there is no library.

3109 Wynwood Ln apt 5  
Los Angeles CA. 90023

*Handwritten signature*

Estimado Sr. Ibarra.

yo el Sr. Ascención Montiel  
estoy apoyando el Plan del dueño  
de Wyverwood amy y amy familia  
Estamos apoyando que aga o Construya  
Unos nuevos apartamentos.-

Porque en los que estamos  
Viviendo ahora ya estan muy  
mal tienen muchas Cucarachas  
Pulgas Ratones y las Plomerías  
acada rato Se tapan.

Muchas gracias.

Ascencion Montiel.



3052. WYNWOOD LN. I  
L.A. CA. 90023



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## About Wyvernwood Apts.

1 message

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Veronica Ramirez <vero\_ramirez83@yahoo.com>  
Reply-To: Veronica Ramirez <vero\_ramirez83@yahoo.com>  
To: "Sergio.Ibarra@lacity.org" <Sergio.Ibarra@lacity.org>

Tue, Oct 25, 2011 at 2:02 PM

Hola,

Mi nombre es Gullermina Paez y yo a sido residente de estos apartamentos por 35 anos. Pero yo estoy por que los tumben. Estos apartamentos estan muy viejos y no estan bien cuidados. Aparte que tenemos cucarachas y abiertas por dentro de los edeficios la oficina y los duenos no asen nada por mantenerlos bien. Yo los apoyo que los tumben asi podriamos tener nuevos edificios y mas durable. Espero que cumplan con lo que ofrecen para todos nosotros los inquilinos. Muchas gracias y suerte.

Sinceramente,  
Guillermina Paez.

---

A quien Corresponda. 9-27-2011

Mi nombre es José E Sánchez  
Soy Residente de Wynvernwood.  
en Boyle Heights he vivido por 18 años  
y yo Apoyo el proyecto de Reurbanización  
que ha Propuesto el dueño al departamento  
de planificación, de la Ciudad de los  
Angeles CA. la principal razón, por,  
la cual yo apoyo el proyecto es,  
las nuevas oportunidades de trabajo.  
que dicho plan tiene para nosotros  
es lo necesitamos que haga Mucho  
trabajo, también la seguridad para,  
nuestros hijos y los parques que  
tanto hacen falta, para que  
nuestros hijos no vayan tan lejos,  
y corran peligro, este es un lugar  
muy peligroso debido a las actividades  
Ilegales Gangas Robos a nuestros  
autos y Casas.

Gracias por su Atención,  
y esperamos que Consideren,  
nuestras Necesidades. Para un nuevo  
Cambio.

Cinseramente:  
José E Sánchez

0

Mi nombre es Flora Santana estoy escribiendo esta carta para informarle que yo estoy de acuerdo con el nuevo proyecto para tumbar los apartamentos. Espero que con la nueva construcción tenga más beneficios para nuestras familias. Espero ver bibliotecas para nuestros niños y jóvenes. Espero tomen en cuenta nuestras necesidades.

2731 Wynglen LN

J.E.



My name is Teresa Valencia  
and I support the project that the owner has the principal motive for which  
I support is because my apartment  
is very deteriorated and we need  
maintenance.

And a new remodeling would not help  
in anything, we also need parks  
and courts for the children to have  
where to play.

Also a library would be  
very good for the students and  
they don't have to go far to do  
their activities.

I hope this petition is  
accepted.

2725 Wynlen Ln LA, CA  
Teresa Valencia

January 12, 2012

RECEIVED  
CITY OF LOS ANGELES

JAN 24 2012

Sergio Ibarra, Major Projects, City of Los Angeles  
City Hall, Room 750  
200 N. Spring Street  
Los Angeles, CA 90012

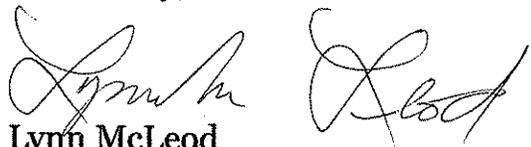
Dear Mr. Ibarra:

I would like to support the preservation and conservation of Wyvernwood as a residential community important to the history and integrity of Los Angeles. Garden apartments are a wonderful concept – and reality! – and Los Angeles should not lose this major achievement to developers who have no respect for past innovation, continuity and the lives of the people who live there. As a historic district in California and a potential member of the National Register of Historic Places, its existence should be nurtured, not destroyed.

Honest application of the EIR principles would promote consideration of a greater range of viable and green preservation alternatives that could retain Wyvernwood’s eligibility as a historic district. Rehabilitation of Wyvernwood would not even approach the environmental damage of constructing a massive new development. Profit, tax income and “jobs” should not outweigh the values of community and sustainability.

On many counts, preserving Wyvernwood would enhance Los Angeles as a world-class city that doesn’t have to discard the past in order to look forward. I hope you and the City will do the right thing and upgrade Wyvernwood.

Yours truly,



Lynn McLeod  
4009 Via Picaposte  
Palos Verdes Estates, CA 90274

November 14, 2011

RECEIVED  
CITY OF LOS ANGELES

DEC 19 2011

ENVIRONMENTAL  
UNIT

Dear Mr. Ibarra:

I am a longtime resident of Wyvernwood Apartments and I want to express my strong support for the planned redevelopment of the property.

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This plan will give us the improved community we've been asking for and let us continue to call Wyvernwood our home. I hope the city approves it quickly.

Sincerely,

Martin R Alpiroz

Print Name

2821 Camulos Pl

Address, Apt #

Los Angeles CA 90023

City, State, ZIP

November 13 2011

Dear Mr. Ibarra:

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Sincerely, 

Gloria Benitez  
Print Name

2764 Glenn Ave #8  
Address, Apt #

Los Angeles CA 90023  
City, State, ZIP

November 2011

RECEIVED  
CITY OF LOS ANGELES

DEC 19 2011

ENVIRONMENTAL  
UNIT

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Sincerely,

Reyna Bravo

Print Name

2750 Glenn Ave

Address, Apt #

Los Angeles, CA 90023

City, State, ZIP

November 13 2011



Dear Mr. Ibarra:

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Sincerely, X

ALINA L. CARNONA.

Print Name

2985 GLENN AVE.

Address, Apt #

L. A. CA. 90023.

City, State, ZIP

November 2011

RECEIVED  
CITY OF LOS ANGELES

DEC 19 2011

ENVIRONMENTAL  
UNIT

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Sincerely, *Guadalupe Castillo*

Guadalupe Castillo  
Print Name

2957 Sussex Ln #7  
Address, Apt #

LA CA 90023  
City, State, ZIP

November 1, 2011

Dear Mr. Ibarra:

I am a longtime resident of Wyvernwood Apartments and I want to express my strong support for the planned redevelopment of the property.

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Sincerely,



Frankie Chaney  
Print Name

2860 Camulos Pl.  
Address, Apt #

November 13, 2011

RECEIVED  
CITY OF LOS ANGELES

DEC 19 2011

ENVIRONMENTAL  
UNIT

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Sincerely, 

David Cristobal

Print Name

3001 E. OLYMPIC Blvd #2

Address, Apt #

LA CA 90023

City, State, ZIP

November 1, 2011

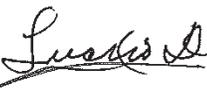
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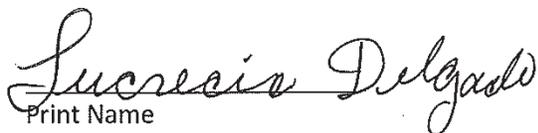
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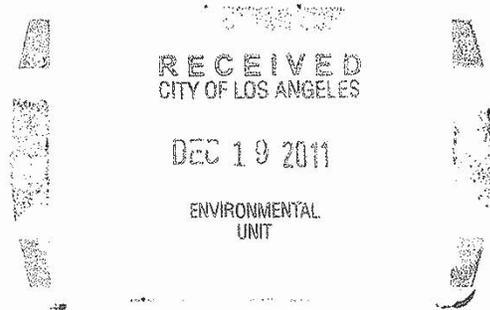
Sincerely, 

  
Print Name

2630 1/2  
Address, Apt #

Ellendil PL  
City, State, ZIP

November 14 2011



Dear Mr. Ibarra:

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Sincerely,

Sesús D. 92

Print Name

2921 Glenn Ave

Address, Apt #

LA CA 90023

City, State, ZIP

November 1, 2011

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Sincerely,

*Juan Flores M*

*Juan Flores M*  
Print Name

*2990 Glesser Ave*  
Address, Apt #

*L.A. CA 90023*  
City, State, ZIP

November 1, 2011

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Sincerely,

Mayra Flores

Print Name

2849 The Mall Apt #2

Address, Apt #

LA, CA, 90023

City, State, ZIP

November 1, 2011

Dear Mr. Ibarra:

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Sincerely, 

Aide Garcia  
Print Name

3121 Wyvernwood Ln Apt #1  
Address, Apt #

Los Angeles, CA 90023  
City, State, ZIP

November 1, 2011

Dear Mr. Ibarra:

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Sincerely,

MARIA Gomez

Print Name

2755 Clevea

Address, Apt #

Los Angeles CA.

City, State, ZIP

RECEIVED  
CITY OF LOS ANGELES

DEC 19 2011

ENVIRONMENTAL  
UNIT

November 14 2011

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Sincerely,

Juan Gonzalez

Print Name

2831 Wynwood Ln.

Address, Apt #

LA. CA. 90023

City, State, ZIP

November 2011

RECEIVED  
CITY OF LOS ANGELES

DEC 19 2011

ENVIRONMENTAL  
UNIT

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Sincerely, *Rosalba Gonzalez*

Rosalba Gonzalez

Print Name

3028 Glenn Ave #7

Address, Apt #

Los Angeles, CA 90023

City, State, ZIP

November 1, 2011

Dear Mr. Ibarra:

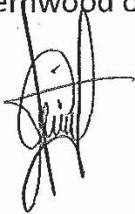
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Sincerely,



Ana María Hernández

Print Name

3108 Wynwood Ln. #6

Address, Apt #

Los Angeles CA. 90023

City, State, ZIP

November 1, 2011

Dear Mr. Ibarra:

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Sincerely,

Claudia Hernandez

Print Name

3017 the Mall St Apt #9

Address, Apt #

LA CA 90023

City, State, ZIP

November 1, 2011

Dear Mr. Ibarra:

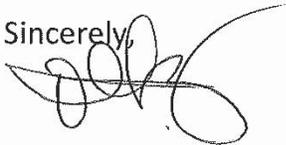
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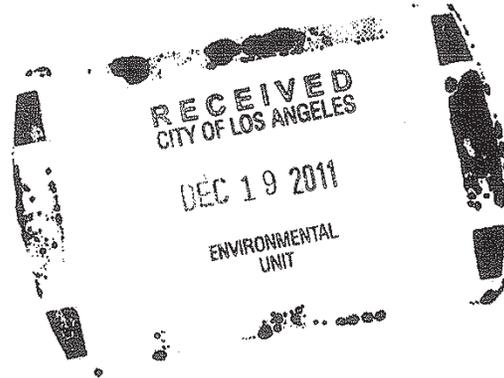
Sincerely,



Nadia Hernandez  
Print Name

2794 Wyngton Lane  
Address, Apt #

Los Angeles, CA 90023  
City, State, ZIP



November 13 2011

Dear Mr. Ibarra:

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Sincerely,

Carmen Herrera

Print Name

620 N. Soto

Address, Apt #

LA CA 90033

City, State, ZIP

RECEIVED  
CITY OF LOS ANGELES

DEC 19 2011

ENVIRONMENTAL  
UNIT

November 15, 2011

Dear Mr. Ibarra:

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This plan will give us the improved community we've been asking for and let us continue to call Wyvernwood our home. I hope the city approves it quickly.

Sincerely,

*Martha Lopez*

Print Name

*3046 Sussex Ln.*

Address, Apt #

*Los Angeles CA*

City, State, ZIP

*90023*

November 2011

RECEIVED  
CITY OF LOS ANGELES

DEC 19 2011

ENVIRONMENTAL  
UNIT

Dear Mr. Ibarra:

I am a longtime resident of Wyvernwood Apartments and I want to express my strong support for the planned redevelopment of the property.

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Sincerely,

Olga Lopez

Print Name

3028 Colenn Ave #3

Address, Apt #

Los Angeles 90023

City, State, ZIP

November 2011

RECEIVED  
CITY OF LOS ANGELES

DEC 19 2011

ENVIRONMENTAL  
UNIT

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Sincerely,

Maribel Mandorado

Print Name

2915 Wynwood Lane

Address, Apt #

Los Angeles, CA

City, State, ZIP

November 1, 2011

Dear Mr. Ibarra:

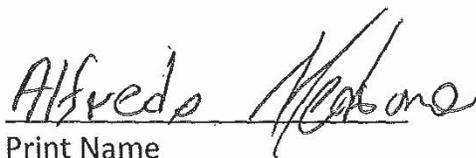
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Sincerely,

  
Print Name

  
Address, Apt #

  
City, State, ZIP

November 1, 2011

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Sincerely,



Daniel Melbrano  
Print Name

2929 E Olympic Blvd Apt 130  
Address, Apt #

Los Angeles CA 90023  
City, State, ZIP

November 13, 2011

RECEIVED  
CITY OF LOS ANGELES

DEC 19 2011

ENVIRONMENTAL  
UNIT

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Sincerely, *J. Ortega*

Jennifer Ortega  
Print Name

2913 Sussex Lane, #22  
Address, Apt #

Los Angeles, CA, 90023  
City, State, ZIP

November 1, 2011

Dear Mr. Ibarra:

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Sincerely,



Carolina Perez

Print Name

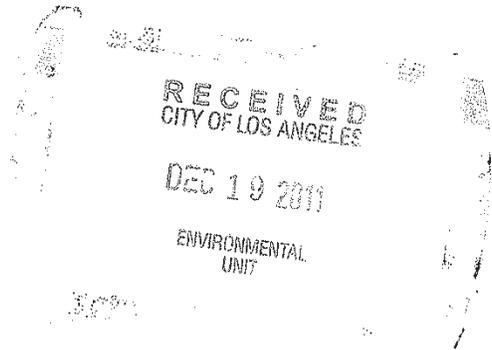
2929 E Olympic Blvd Apt 130

Address, Apt #

Los Angeles CA 90023

City, State, ZIP

November 10, 2011



Dear Mr. Ibarra:

I am a longtime resident of Wyvernwood Apartments and I want to express my strong support for the planned redevelopment of the property.

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Sincerely,

Yadira Pineda

Print Name

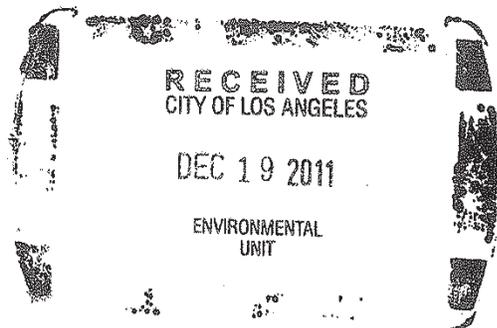
1038 W 42nd. st

Address, Apt #

LA CA 90037

City, State, ZIP

13 November 2011



Dear Mr. Ibarra:

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Sincerely,

Print Name

Address, Apt #

City, State, ZIP

November 1, 2011

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Sincerely,

RITA  
Print Name

2819 CAMILAS PL  
Address, Apt #

90023  
City, State, ZIP

November 2011

RECEIVED  
CITY OF LOS ANGELES

DEC 19 2011

ENVIRONMENTAL  
UNIT

Dear Mr. Ibarra:

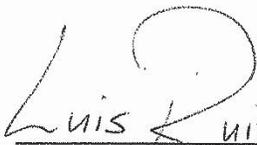
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Sincerely,

  
Luis Ruiz

Print Name

3019 Sussex Lane

Address, Apt #

CA, LA 90023

City, State, ZIP

November 2011

RECEIVED  
CITY OF LOS ANGELES

DEC 19 2011

ENVIRONMENTAL  
UNIT

Dear Mr. Ibarra:

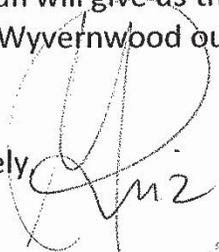
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Sincerely,



MARTIN Ruiz

Print Name

2866 The Mall #11

Address, Apt #

Los Angeles, CA 90023

City, State, ZIP

November 1, 2011

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Sincerely,

Jose Sanchez Jr.

Print Name

2796 Wynnlen Ln

Address, Apt #

LA, CA 910023

City, State, ZIP

JSSanchez019f@gmail.com

November 13 2011

RECEIVED  
CITY OF LOS ANGELES

DEC 19 2011

ENVIRONMENTAL  
UNIT

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Sincerely,

Ramon Sanchez

Print Name

2716 Wynglen Ln.

Address, Apt #

L.A. CA. 90023

City, State, ZIP

November 1, 2011

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Sincerely,  
*Florencia Santana*

*Florencia*  
Print Name

*3021 SUSSEX LN*  
Address, Apt #

*Los Angeles CA 90023*  
City, State, ZIP

November 1, 2011

Dear Mr. Ibarra:

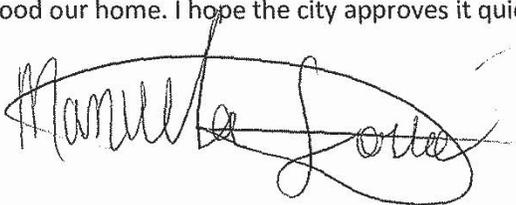
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Sincerely,



Manuela Soria  
Print Name

712 W. 41st Pl.  
Address, Apt #

LA. CA. 90037  
City, State, ZIP

November 1, 2011

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Sincerely,



Tania Soria  
Print Name

712. W. 41st  
Address, Apt #

LA, CA 90037  
City, State, ZIP

November 1, 2011

Dear Mr. Ibarra:

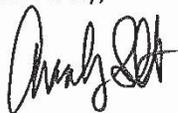
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Sincerely,



Aracely Soto  
Print Name

2806 Glenn Ave #  
Address, Apt #

Los Angeles, CA 90023  
City, State, ZIP

November 1, 2011

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Sincerely,



JUAN CARLOS TAN  
Print Name

2773 WYVERNWOOD LN.  
Address, Apt #

LOS ANGELES, CA. 90033  
City, State, ZIP

November 19 2011

Dear Mr. Ibarra:

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Sincerely,

*Anais Tellez*

  
\_\_\_\_\_  
Print Name

*1660 S. Santa St.*  
\_\_\_\_\_  
Address, Apt #

*Lo. Ca. 90023.*  
\_\_\_\_\_  
City, State, ZIP

13 de noviembre 2011



Estimado Señor Ibarra:

Soy un residente de los Wyvernwood apartamentos y quiero expresar mi fuerte apoyo del desarrollo planificado para la propiedad.

Los apartamentos actuales son pequeños y fuera de fecha, el diseño del sitio es inconveniente y en general la comunidad debe ser modernizada. Me gustaría ver este proyecto aprobado para que me pueda mover a mi apartamento nuevo, moderno y cómodo lo más pronto posible. Tener aire acondicionado, cableado de TV por cable, más baños, gruesos muros y ventanas, balcones, patios, etc. serían mejoramientos bienvenidos para todos nosotros.

Lo que es aún más emocionante es que seremos capaces de vivir en nuestro apartamento nuevo sin tener que pagar más en renta de lo que habríamos pagado por nuestra unidad actual. También no tendremos que mudarnos afuera de los apartamentos durante la construcción y no perder la comunidad especial que hemos formado aquí sobre la propiedad. Por último, conozco muchos vecinos aquí que verdaderamente se beneficiarían del acceso a los 15 por ciento de unidades designadas viviendas económicas.

Este plan nos dará la mejor comunidad que hemos estado pidiendo y poder continuar llamando Wyvernwood nuestro hogar. Espero que la ciudad lo apruebe rápidamente.

Atentamente,

*Isela929@gmail.com*

*Isela Acosta*

Nombre

*7415 S. San Pedro St.*

Dirección, Apt #

*9003*

Ciudad, Estado, ZIP

14 de Noviembre, 2011

RECEIVED  
CITY OF LOS ANGELES

DEC 19 2011

ENVIRONMENTAL  
UNIT

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Atentamente,

Joaquina Aguilera

Nombre

3011 Rosalind Pl # 6

Direccion, Apt #

LA. CA. 90023

Ciudad, Estado, ZIP

1 de noviembre 2011

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Atentamente,



CARLOS ARQUIN.

Nombre

438 S. EVERGREEN AVE.

Dirección, Apt #

LA. CA. 90033

Ciudad, Estado, ZIP

1 de noviembre 2011

Estimado Señor Ibarra:

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Atentamente,



Jorge Arila

Nombre

2738 Glenn

Dirección, Apt #

LA. CA. 91023

Ciudad, Estado, ZIP

1 de noviembre 2011

Estimado Señor Ibarra:

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Atentamente,

*Elizabeth Bahena*

Elizabeth Bahena

Nombre

1301 S. Boyle Ave Apt #5401

Dirección, Apt #

90023, Los Angeles CA.

Ciudad, Estado, ZIP

1 de noviembre 2011

Estimado Señor Ibarra:

Soy un residente de los Wyvernwood apartamentos y quiero expresar mi fuerte apoyo del desarrollo planificado para la propiedad.

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Atentamente,



Erick Bahena

Nombre

1301 S. Boyle Ave Apt #5401

Dirección, Apt #

Los Angeles, CA, 90023

Ciudad, Estado, ZIP

1 de Noviembre, 2011

Estimado Senor Ibarra:

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Atentamente,

JOSE MANUEL BALBUENA

Nombre

3032 GLENN AV

Direccion, Apt #

LOS ANGELES, CALIFORNIA 90023

Ciudad, Estado, ZIP

1 de noviembre 2011

Estimado Señor Ibarra:

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Atentamente, 

Silvia Brizuela  
Nombre

13015 - Boyle ave - apto. # 5102  
Dirección, Apt #

La Ca 90023  
Ciudad, Estado, ZIP

13 de noviembre 2011

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Estimado Señor Ibarra:

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Atentamente,

*Jesse Bucio*

Jesse Bucio

Nombre

2796 WYNGLEN AVE.

Dirección, Apt #

LA CA. 90023

Ciudad, Estado, ZIP

1 de noviembre 2011

Estimado Señor Ibarra:

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Atentamente,

MARIO F CABRERA

Nombre

2840 The MALL

Dirección, Apt #

L-A 90023

Ciudad, Estado, ZIP

14 de Noviembre, 2011

Estimado Senor Ibarra:

Soy un residente de los Wyvernwood apartamentos y quiero expresar mi fuerte apoyo del desarrollo planificado para la propiedad.

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Atentamente,

Mateo Cacatzun

Nombre

2921 The Mall #9

Direccion, Apt #

Los Angeles CA 90023

Ciudad, Estado, ZIP

13 de noviembre 2011

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Atentamente,

Vicente Carmona

Nombre

2985 Glenn Ave

Dirección, Apt #

Los Angeles, CA 90073

Ciudad, Estado, ZIP

B 1 de noviembre 2011

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Atentamente,

Norma Casanova

Nombre

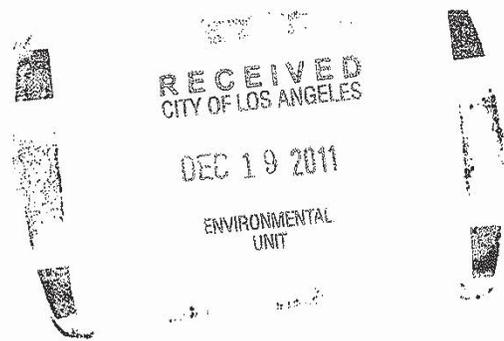
2805 1/2 MacGregor Ave.

Dirección, Apt #

Los Angeles Ca. 90033.

Ciudad, Estado, ZIP

14 de Noviembre, 2011



Estimado Senor Ibarra:

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Atentamente,

Andrea Castillo

Nombre

2921 The Mall #9

Dirección, Apt #

Los Angeles CA 90023

Ciudad, Estado, ZIP

14 de noviembre 2011

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Atentamente,

Marcia Castillo -

Nombre

2407 Glenwood St.

Dirección, Apt #

J.A. Calif 90023

Ciudad, Estado, ZIP

de noviembre 2011



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Atentamente, 

Rosalinda Castillo

Nombre

2957 Sussex Ln #7

Dirección, Apt #

LA CA 90023

Ciudad, Estado, ZIP

3 de noviembre 2011

Estimado Señor Ibarra:

Soy un residente de los Wyvernwood apartamentos y quiero expresar mi fuerte apoyo del desarrollo planificado para la propiedad.

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Atentamente, *Jorge*

*Jorge Castro*  
Nombre

*3023 Sussex Ln*  
Dirección, Apt #

*Los Angeles Ca.*  
Ciudad, Estado, ZIP

1 de noviembre 2011

Estimado Señor Ibarra:

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Atentamente,

*Mariauz C.*

MARIAUZ CAUICH.

Nombre

1311 S. Boyle H.V. 4402.

Dirección, Apt #

Los Angeles CA. 90023

Ciudad, Estado, ZIP

1 de noviembre 2011

Estimado Señor Ibarra:

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Atentamente, X

X

Guadalupe Contreras  
Nombre

3002 The Mall  
Dirección, Apt #

Los Angeles, CA 90023  
Ciudad, Estado, ZIP

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13 de noviembre 2011

Estimado Señor Ibarra:

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Atentamente,

Liliana Cristobal  
Nombre

3001 E Olympic Blvd. #2  
Dirección, Apt #

LA CA. 90023  
Ciudad, Estado, ZIP

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CITY OF LOS ANGELES

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1<sup>o</sup> de noviembre 2011

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Este plan nos dará la mejor comunidad que hemos estado pidiendo y poder continuar llamando Wyvernwood nuestro hogar. Espero que la ciudad lo apruebe rápidamente.

Atentamente,

Sofia Cristobal

Nombre

3001 E Olympic Blvd #2

Dirección, Apt #

Los Angeles CA 90023

Ciudad, Estado, ZIP

1 de noviembre 2011

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Atentamente,



Rosa Curiel  
Nombre

1321 S. Boyle Ave #3402  
Dirección, Apt #

Los Angeles Ca. 90023  
Ciudad, Estado, ZIP

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Atentamente,

*Maisal de Dios*

Nombre

*0225 Lorena St # 2*

Dirección, Apt #

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Ciudad, Estado, ZIP

*Isamri@Hotmail.com*

14 de noviembre 2011

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Atentamente



Jessica Diaz

Nombre

2921 Glenn Ave

Dirección, Apt #

LA CA 90023

Ciudad, Estado, ZIP

1 de noviembre 2011

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Atentamente,

*Jose Diaz*

*Jose Diaz*

Nombre

*1311 S Boyle Av #4101*

Dirección, Apt #

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Ciudad, Estado, ZIP