

SAVE SUNSET BOULEVARD - EIR COMMENTS ON 8150 SUNSET



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

JAN 20 2015

To the City of Los Angeles Planning Department, Tom LeBonge, Jonathan Brand.

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

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

Please enter the following comments on the Draft Environmental Impact Report (EIR) for the proposed project at 8150 Sunset Boulevard in the City of Los Angeles, California into the public record, and address each one.

Please also enter into the public record that Save Sunset Boulevard is a coalition of neighbors who are horrified at the size, scale, mass, traffic, shading, and geological consequences of this project on our historic neighborhood. This letter augments the over 700 (at last count) letters from our neighbors that have been submitted via our Save Sunset Boulevard's website, to the City Planning Office, Tom LeBonge and Jonathan Brand.

Documents referenced in this letter are attached as PDF's and listed on the final page of this document.

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GENERAL NOTES AND COMMENTS:

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

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

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

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

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

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

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

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

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

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

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

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

Where is the developer getting the density figures from? The EIR must show how these figures have been arrived at.

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

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

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

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

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

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

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The Hollywood Community Plan serves to “encourage the preservation and enhancement of the varied and distinctive residential character of the community” –pg.1, section 3

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

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

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

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

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

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

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

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

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

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The EIR goes on to say:

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

Pg 154-155 of Appendix C3, Historic Resource Appendix Report.

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

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

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

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

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

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

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The Hollywood General plan mandates that we must:

“protect lower density housing from the scatted intrusion of apartments”

page 1: section 3.

“promote the preservation of views, natural character and topography of mountainous parts of the Community” page 1: section 7

And that;

“Transitional building heights should be imposed, especially in the Medium density housing designated area where this designation is immediately adjacent to properties designated Low Medium 1 or more restrictive” page 3

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

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

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

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

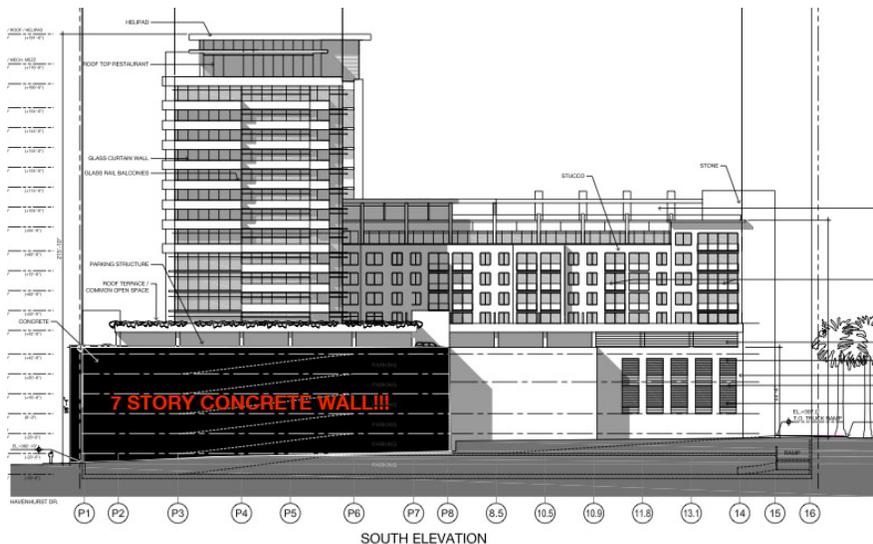
The EIR is nearly devoid of any discussion of the potential impacts of a dramatic change in the zoning for one lot in a historic neighborhood. The EIR inadequately discusses any of these important and directly applicable policies.

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On the left is the 2 story National Historic Register building, The Andalusia; directly across the street is the 8150 project site where the 220 foot building with its seven story concrete walled car parking structure is proposed, will completely over shadow it.



The projects seven story concrete parking structure is within feet of this modest two story neighboring building on the right.

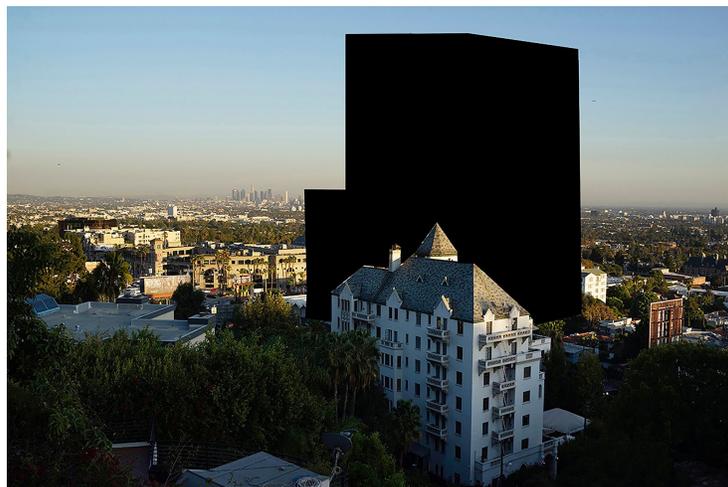


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The views of and from The Colonial House (right), another National Historic Register building, will be gone once a 216 foot tall skyscraper is built on the left hand portion of these photos.



Below is an illustration of how completely out of scale the proposed 220 foot building is with the 2-8 story context of the neighborhood.



Environmental Leadership Development Project

Where are the improvements mandated to gain an ELDP status and exemption?
How does this project meet the threshold?

The ELDP states;

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

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

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

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

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

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

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

The ELDP states the project must have a net reduction of greenhouse emissions, but the 11,693 new vehicle movements this project will generate will massively degrade both the neighborhood, community and city air quality.

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

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

ZONING, HEIGHT, DENSITY, AND TRANSIT

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

This area is not designated a "Regional Center," but the project is an "infill" project. Pursuant to Senate Bill 743 ("SB 743"), recently passed by the California legislature, aesthetic and parking impacts of residential, mixed use residential, and employment center projects on infill sites within transit priority areas (such as the proposed Project) "shall not be considered significant impacts on the environment."

However, SB 743 also states that local agencies may continue to set their own thresholds, including those for aesthetic impacts. As such, the analysis presented below evaluates aesthetics, views, light/glare, and shade/shadow impacts per the City of Los Angeles' local CEQA guidelines, which are contained in the Los Angeles CEQA Thresholds Guide, discussed below.

APPLICANT TEXT

b. Regulatory Framework

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

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

(1) "**Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.**"

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

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

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

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

COMMENT

We dispute the applicants assertion based on its non-compliance with the current law.

4.A-11.

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

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

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4.A-15

b. Thresholds of Significance

(1) Visual Character and Aesthetics

(a) Appendix G to the State CEQA Guidelines

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

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



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

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

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

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

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

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

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Also please justify permitting a development with a height of 220 feet on this site without a variance from Code Section SEC. 12.22.A.25.f.5

Specifically: (5) Height. A percentage increase in the height requirement in feet equal to the percentage of Density Bonus for which the Housing Development Project is eligible. This percentage increase in height shall be applicable over the entire parcel regardless of the number of underlying height limits. For purposes of this subparagraph, Section 12.21.1 A.10. of this Code shall not apply.

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

New Residential Units

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

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

The EIR must correct address and recirculate the answers to all these concerns.

PARKS AND GREEN OPEN SPACE

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

APPLICANT TEXT:

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

COMMENT

As can be seen from the images below, this one-building lot, pocket park cannot be considered as open space for a project of this density, size, scale and mass.



COMMERCIAL USE AND JOBS

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

However the EIR fails to provide information or detail regarding;

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

TRAFFIC

The traffic analysis in the DEIR is inadequate to answer the issues we have raised in our review and we believe the impacts are grossly understated. **We request that the applicant redo the analysis as suggested and that the DEIR be reissued for another 45 days for further review and comment.**

Our traffic consultant, Allyn Rifkin, former Bureau Chief of the LA DOT Planning Bureau, has calculated that the real figure for New Vehicle Trips generated by the project as it is proposed will be 2751. This has been correctly calculated using the I.T.E Trips Generation Manual, 9th Ed, Vol 6.

The wildly inaccurate analysis in the EIR must be redone and recirculated. It goes without saying that since the traffic figures are so flawed, the figures used to calculate the parking, both within the structure and its massive neighborhood destroying overflow, must also be realistically recalculated and recirculated.

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

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

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The project site does not fit the definition of a "transit oriented development" as the site is located almost two (2) miles from any rail transit (Red Line).

While there is a local bus stop on Sunset Blvd for Laurel Canyon, only Fairfax Ave has a local and rapid bus stops, but simple posts in the pavement cannot be described as a "regional transport hub" and it also lies beyond the mandated 1500 feet from the development. That bus is also constantly detoured due to numerous Hollywood Boulevard closures. The current local bus stop locations and sidewalks cannot support or accommodate high volume transit riders without significant improvements to all bus-transit stop locations within the project vicinity. The intersections and streets adjacent to 8150 in the City of Los Angeles and City of West Hollywood are already operating a "Fail" during peak and normal hours.

The EIR is asking for 'Green Bonuses' by providing parking for over 1,300 bicycles. With each bicycle space taking at least 6 square feet, that's a minimum of 6,000 square feet of encouraging the use of bicycles. However the EIR fails to recognize the unsuitability of the area for cyclists. The heavily trafficked junction of Sunset Boulevard, Crescent Heights and Laurel Canyon is already one of the most dangerous in the City of LA, and has had several bicycle fatalities in recent years. The hillside roads are all narrow, extremely steep and already overburdened by massive amounts of traffic, making them completely unsuitable and dangerous for any kind of weekday transport/transit cycling.

Despite the inherent dangers on the main roads and the unsuitability of the steep hillsides narrow and already overcrowded streets, the EIR fails to mention bicycle safety or bicycle routes for its proposed 1300 cyclists. Where are the bike lanes being proposed or planned? The sidewalks are certainly too narrow to support even a very few cyclists, and with the proposed increase in pedestrian traffic the project says it will generate, they will be completely unsuitable for cyclists.

It is glaringly obvious that all travel to and from the project site from all the neighboring hillsides and surrounding areas will be by car at all times of operation, especially during later night time hours. It must be noted that;

- Intersections and streets in the area surrounding the project site in the Cities of Los Angeles and West Hollywood are already operating a "Fail" during peak hours and beyond.
- Sunset Blvd, Crescent Heights and Laurel Canyon have no bike lanes now or planned. The sidewalks are narrow and unable to support safe bike riding.
- Therefore it is clear that all travel to and from the project site from the immediate neighboring hillsides and surrounding areas will be by car at all times of operation, especially during later night time hours.
- The projects proposed height, size, density, design and proposed volume use is incompatible with the neighborhood character and infrastructure capabilities.
- The projects proposed high volume commercial activity and late night use will have overwhelming and permanent negative impact on the surrounding community and daily commuter travelers on Laurel Canyon, Crescent Heights, Sunset Blvd and Fountain Ave.

These comments, and those in Allyn Rifkin's letter (addendum #1) must all be addressed and circulated in the final EIR.

RESIDENT AND GUEST PARKING

Resident parking figures are nothing short of ridiculous according to the EIR.

- Residential Units 249 for 505-528 residents = 210
 - 233 resident will Not have parking
 - Studio 73 units = 73 vehicle parking spaces
 - One Bedroom = 130 vehicle parking spaces
 - Two Bedroom = 76 vehicle parking spaces
 - Three Bedroom = 16 vehicle parking spaces
-
- **Total Resident Vehicle Parking Spaces = 295**

Resident & Guest Parking consequences on the neighboring community.

- **505-528 new residents where there are currently none.**
- 528 new residents minus (-) 295 resident / guest parking spaces =
- **233 residents with NO on-site parking will create a massive overflow**
- Guest Parking = ? (zero) which will also create a massive parking overflow

The project assumes that 210 to 233 residents will not have a car, but will walk, ride a bike or take the bus. How do these high income, high value units sell to people with no car in a city with no realistic public transport alternatives? The EIR needs to suitably demonstrate how people who are spending \$1500 a square foot to buy an apartment in the proposed site (or rent at comparative rates) will not have a car. It is possible in New York, Paris or London, but it is totally impossible on the border of West Hollywood.

What about the Guests of the residents?

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

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

PARKING FOR RESTAURANT, EMPLOYEE AND RETAIL PATRONS

Unrealistically limited commercial & employee shared parking.

The EIR states that the originally proposed 617 vehicle parking spaces will be further reduced by 123 additional vehicle parking spaces to allow for 380 more bike parking spaces, leaving just **494 shared vehicle parking spaces.**

- The EIR assumes that more than half the guests, employees and patrons will not have a car, but will ride a bike.

SAVE SUNSET BOULEVARD - EIR COMMENTS ON 8150 SUNSET

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

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

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

The also EIR fails to mention the history of the developers overcharging for parking at this site. The EIR must reflect and discuss this as it throws into question their ability to safeguard their tenants, residents, commercial operators and act as responsible operators of a neighborhood serving destination.

See: "Sunset Stripmall Owner Sued by Tenants Over Parking Fees | WEHOville <http://www.wehoville.com/2013/04/17/sunset-stripmall-owner-sued-by-tenants-over-parking-fees/>

1365 BICYCLE PARKING SPACES

The EIR states that bicycle parking spaces have been increased by 380, for a total of 1365. This has been achieved by reducing 123 commercial and residential vehicle parking spaces. Further the project states the future studies for possible bike paths were suggested as part of a study farther east from the project site - Fairfax, Hollywood and Sunset Blvd.

SAVE SUNSET BOULEVARD - EIR COMMENTS ON 8150 SUNSET

This cynical, bonus grabbing antic provides on-site (mostly short term) bike parking, but is completely unsuitable for this location. The EIR fails to reflect how

the 'high income' individuals residing in, frequenting, or working at their 'newly created high income jobs' will chose to risk their lives in one of the most hazardous and congested areas of Hollywood.

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

The EIR must demonstrate how it arrived at this figure as a percentage of residents, guests, patrons and employees who would use a bicycle as a form of transport, and give real world examples of buildings in a similarly hilly, high traffic density area.

The EIR must also provide full details on bike parking:

- Where in the structure is short term bike parking?
- What constitutes "long term" and "short term" bike parking? Minutes, hours or days of parking use?
- Will exterior bike parking be covered and lighted?
- Will bike parking areas provide 24 hours security?
- Will there be a fee or charge for long term or short term bike parking?
- Will shower and lockers be available to all employees and/or patrons using bicycles?
- What times of the day will showers and lockers be open and available?
- Will there be a charge (fee) for use of showers and lockers?
- Will there be valet bike parking and at what charge?
- The project state that bikes lanes and bike paths are being "studied" for future application; however, the EIR fails to provide information or detail on the time horizon of the study, is it five years, ten years, never?
- Who will be conducting the study and installation of the bike paths and lanes?
- What streets are the bike paths and bike lanes to be installed on?
- How will it affect traffic and parking?
- Which and how many vehicle travel lanes will be removed to accommodate the new bike paths and bike lanes?
- What is the location of a safe bike path feeding directly into and out of the project site?
- Will bike riders be expected to share the sidewalk with pedestrians?
- Will bike paths be actual protected bike paths and bike lanes or minimal non safety sharrows?
- How many vehicle travel lanes and what length of the street will be lost on each street to apply new bike paths
- How will cyclists, including children, safely access the site and bike parking?
- Will a security guard be stationed at bike parking area all the time?

SAVE SUNSET BOULEVARD - EIR COMMENTS ON 8150 SUNSET

There are no bike paths or bike lanes now, or proposed in the plans. Due to the high volume motorized traffic, putting 1,000+ cyclists in the dense and dangerous traffic on Sunset Blvd, Crescent Heights, Laurel Canyon, even Fountain Ave and Havenhurst Dr without protected bike lanes for adults and children, is a public safety debacle. This must be suitably addressed and circulated in the final EIR.

Designated bike access from all surrounding streets to and from project site must be included for, but the current layout of these streets makes this an impossibility.

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

PARKING CHARGE & VALET CHARGE

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

- Resident may rent or purchase an additional vehicle parking space. What would the weekly or monthly fee per space?
- What is the cost or charge to park and Valet parking? Long term - Short term
- Is self parking option provided?
- Will guests of residents be charged for parking or free parking? What cost?
- Will employees be charged to park ? What cost?
- Will transit passes and discounts will be offered; What type - How many ? What cost and for how many years? For residents, employees, patrons, guests?
- The developer tried out the pay parking at this location charging \$3 for 15 minutes to park. It failed. Will the developer be charging these rates again?

The EIR states that 8150 will be 100% valet parking. Does this apply to the affordable housing units as well? How will they pay for this service or will the other residents subsidize this cost in their charges?

The EIR must evaluate the street parking available in the area. What conditions will be applied to ensure that there no impacts to the adjacent streets? The site is currently self-parked with free parking, so the EIR must also evaluate whether free self-parking will help mitigate impacts of the 2751 new vehicle trips this project will generate on the adjacent streets. (figure re I.T.E Trips Generation Manual, 9th Ed, Vol 6 - please quote, confirm and recirculate in the new EIR).

VANPOOL & CARPOOL

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

- Will these ride options be provided by the building management or by individual establishments?
- How long will this service be guaranteed to employees, commercial operators and most importantly, the community?
- Who and how will the operation of the Van Pool and Ride Share be policed?

SAVE SUNSET BOULEVARD - EIR COMMENTS ON 8150 SUNSET

- What measures are in place to guarantee it remains enforced for the life of the building?
- How will the community, the City and the Neighborhood Council be reimbursed if new landlords decide they no longer want to offer it?
- Where will the van pool and ride share pick up and drop be?
- What times and frequency will this service be available?
- Will all ride share and ride home options be available daily, day & late night service and what charge / fee?
- Will the "Van Pool" service be available for all residents, guests, employees?
- Will three or more per car will be offered parking discounts-what discounts?
- How will that be available, to who and at what cost ?
- The project requests 80% vehicles spaces to be Compact cars.The EIR does not explain why, or discuss the lower ride sharing suitability of these?
- How many free parking spaces?
- What is the charge for ride share at the Valet?
- Will valet charge increase at night or evening hours?
- Will parking be validated by on site commercial establishments - How many minutes at what charge?
- How much handicap parking will there be, and will it be free?
- How many Electric car spaces w/plug in will be provided?.
- What voltage/wattage/hours to charge and at what costs to residents, patrons and guests?
- What protections to existing neighborhood residents will the project provide?

VEHICLE TRAFFIC & CIRCULATION

APPLICANT TEXT:

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

CORRECTION

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

SAVE SUNSET BOULEVARD - EIR COMMENTS ON 8150 SUNSET

COMMENT

Streets surrounding the project site should not have been studied as "modified" street standards for the project's traffic study. The EIR must reflect the correct current Hollywood Community Plan.

The EIR fails to provide information and detail on why the project proposes to use and incorporate the City of Los Angeles owned traffic island, street and right turn lane, making it a part of their project.

The removal of the City owned traffic island, street and right turn would cause irreversible and severe negative impact on traffic for the entire surrounding area forever. This proposed change should be eliminated from the project plan.

The EIR must review the lasting, negative effects of eliminating the City owned traffic island and dedicated right turn lane and moving the Metro bus stop.

The EIR also fails to provide detail as to how the increase in vehicle traffic, traffic flow, transit riders, pedestrians and bike riders would safely co-exists and move to and from the project site and throughout the neighborhoods and community.

The current City of Los Angeles owned traffic island should remain and be improved to accommodate the new increase in transit user volume, pedestrians and bike riders. Traffic Island should not be incorporated into the project.

The EIR must examine how articulated fire engines, large trucks, private buses, and other long wheel base vehicles would make that right turn. The removal of the island would make it impossible for anything large than a compact car to make the almost hairpin turn that would remain the only southbound option.

The elimination of the traffic island would prevent, or at minimum, severely limit Metro and the City of Los Angeles from any future enhancements and additions of new transit service. Any future or new transit service that would require the right or left turn at Sunset Blvd and Crescent Heights would no longer be an option for the City or Metro.

Elimination of the traffic island and current dedicated-sweeping right turn would make very dangerous conditions for vehicles attempting to make the right turn onto Crescent Heights and also vehicles turning left onto Sunset from Crescent Heights left.

Since all turning traffic would now have to wait for pedestrians and bike riders to clear the junction, this would cause further back-ups along Sunset Blvd. This would fray tempers, putting pedestrian and cyclists at the crosswalk in further danger while adding even more pollution to the neighborhood than the 2751 new vehicle trips the project will generate.

SAVE SUNSET BOULEVARD - EIR COMMENTS ON 8150 SUNSET

APPLICANT TEXT:

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

COMMENT

The project proposes a signal light at Fountain Ave at Havenhurst Dr to mitigate traffic. The EIR traffic study fails to provide detail of the severe negative impacts due to vehicles backing up on Fountain Ave;

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

The project proposes to mitigate pedestrian and bike safety by prohibiting left turn from Crescent Heights into the project site. This is already an illegal turn, but regardless of that, the EIR fails to provide information on how this would affect traffic and circulation into and out of the project site;

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

The project proposes the use of the current Crescent Heights street vehicle travel "merge" lane for their valet parking drop off and queuing. However the EIR fails to address or provide detail regarding these safety issues;

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

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APPLICANT TEXT:

All of the Project's residential component trips must exit from the Havenhurst Drive driveway toward the north; approximately 10 percent of the Project's residential trips exiting the Havenhurst Drive driveway are expected to utilize an "around the block" route to access Fountain Avenue, turning right from Havenhurst Drive onto

SAVE SUNSET BOULEVARD - EIR COMMENTS ON 8150 SUNSET

eastbound Sunset Boulevard, and then turning right again onto southbound Crescent Heights Boulevard before continuing along westbound Fountain Avenue.

COMMENT

- The EIR proposes to eliminate the current traffic island, bus stop and traffic lights and streets lights.
- The EIR proposes to eliminate the current dedicated right turn lane from eastbound Sunset Blvd to southbound Crescent Heights.
- The EIR proposes moving the bus stop further east, away from the site.
- The EIR proposes all residential vehicles must exit on Havenhurst and travel north to Sunset Blvd. the vehicles that don't turn west on Sunset Blvd would have to turn east on Sunset Blvd, then TURN RIGHT around the tip of the deleted traffic island (now the project's plaza) onto Crescent Heights in order to access Fountain Ave or travel south on Crescent Heights.
- Vehicles making the right turn from Sunset Blvd to Crescent Height will be increased by many thousands of vehicle trips daily from residents, employees and vehicles returning to the valet drop off.
- All these vehicles will have to skirt the taxi and limo drop off for the proposed concerts, and open air entertainments, as well the multitude of restaurants, creating a massive bottle-neck, adding to the traffic mess generated by the SBE venue, and Chateau Marmont's drop off, both directly across the street.
- Right turns around the deleted traffic island from all this new traffic would create tremendous back-ups on Sunset Blvd as all right turning vehicles will now be forced to wait for pedestrians and bikes to cross Crescent Heights at Sunset Blvd.
- Thousands of passenger vehicles, large delivery trucks and emergency vehicles would now be attempting to make this almost hairpin right turn daily.
- All long wheel base vehicles, including Fire Trucks, would be forced into opposing traffic lane when attempting to make this tight and unsafe right turn.
- This will impede the already heavy eastbound traffic flow on Sunset Blvd, especially during PM peak commute hours (Today that lasts from 3pm-8pm)
- What will adding thousands more vehicles into such a heavy trafficked intersection that already operates at "E" to "F" do to the quality of life and the air quality of the neighborhood and community?
- It makes No Sense in regard to traffic flow, turn capabilities and vehicle, pedestrian and bike safety to remove the current dedicated turn lane and traffic island. The mass of pedestrians, bike riders and bus riders generated by the project crossing Crescent Heights to access and leave the project site makes removing the traffic island even more non-sensical.
- Moving the bus stop farther away from the project site, forcing transit riders to walk back and cross Crescent Heights is also neither safe nor sensible.

APPLICANT TEXT:

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

SAVE SUNSET BOULEVARD - EIR COMMENTS ON 8150 SUNSET

as well as a total of approximately 314 new trips per day on Fountain Avenue west of Havenhurst Drive, a total of approximately 313 new trips per day on Fountain

Avenue between Havenhurst Drive and Crescent Heights Boulevard, and a total of approximately 78 new daily trips per day on Fountain east of Crescent Heights. Therefore, the Project's combined retail/commercial and residential components are estimated to add approximately 469 new (northbound only) trips per day to Havenhurst Drive south of the Project Site, along with approximately 654 new daily trips on Fountain Avenue west of Havenhurst Drive, a total of approximately 653 new daily trips on Fountain Avenue between Havenhurst Drive and Crescent Heights Boulevard, and a total of approximately 418 new trips per day on Fountain Avenue east of Crescent Heights Boulevard.

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

COMMENTS CONTINUED

The project proposes all patron and employee vehicles, delivery trucks and service trucks will exit onto Crescent Heights turning left to Sunset Blvd and right turns to Fountains Ave. However the EIR fails to address and provide information and detail regarding realistic traffic operations;

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

All these comments in this VEHICLE TRAFFIC & CIRCULATION section must all be addressed and circulated in the new EIR, as well as the comments made by our Traffic Consultant, Allyn Riskin in his attached letter, Appendix #1

PUBLIC TRANSIT, CIRCULATION AND IMPROVEMENTS

Local Bus Stop: **Yes**

Transit Stop: **Sunset and Fairfax**

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

Bus Stop: **Removed from site**

Dash Bus: **No**

Bike Lanes / Bike Path: **No**

Proposed Bike Lanes / Paths: **No**

Bike Access to Project Site: **None shown in EIR**

Bike Lane Improvements: **None**

APPLICANT TEXT:

(d) Public Transit

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

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

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

Using the AVO factor of 1.2 persons per vehicle, the Project's residential component could result in a potential increase in area transit ridership of approximately 187 persons per day.

While it is acknowledged that bus utilization in the Project vicinity can be heavy during the peak weekday commute periods, this nominal level of new rider demand would likely be divided among the three bus lines (Metro Lines 2/302, and Metro Line 218) providing direct service to the Project Site.

COMMENT

Only local bus service is available at the site, and the EIR also states that a Dash Bus Service is available at the project site.

CORRECTION

The project site is more than 1500 feet from a main bus line, and 1.9 miles from the Red Line at Hollywood & Highland, far beyond the distance a commuter would consider walking. The project misleadingly used old and outdated information from

SAVE SUNSET BOULEVARD - EIR COMMENTS ON 8150 SUNSET

the now scrapped 2012 Hollywood Community Plan Update. The Dash bus was withdrawn on Aug 1, 2010 due to it not enough riders to make economical sense.



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

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

Metro Service Changes | December 2013 Service Changes and Detours

Monday through Friday <small>Effective Dec 14, 2013</small>		780
Saturday, Sunday and Holiday Schedules		
No service on Saturday, Sunday, New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day.		
217 Hollywood/Vine Station -- Howard Hughes Ctr via Hollywood Bl -- Fairfax Av - La Cienega Bl	Establish regular detour route from Hollywood Bl/Highland Av via Highland Av, Sunset Bl to Fairfax Av on frequent days when Hollywood Bl is closed for special events.	
780	Metro Rapid - Washington/Fairfax - Pasadena via Fairfax Av & Hollywood & Colorado Bl	12/15/13

SAVE SUNSET BOULEVARD - EIR COMMENTS ON 8150 SUNSET

COMMENT

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

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

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

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

LATE NIGHT BUS SERVICE

The EIR proposes late night operations and events running until 2am close. However, there is not the service to support this.

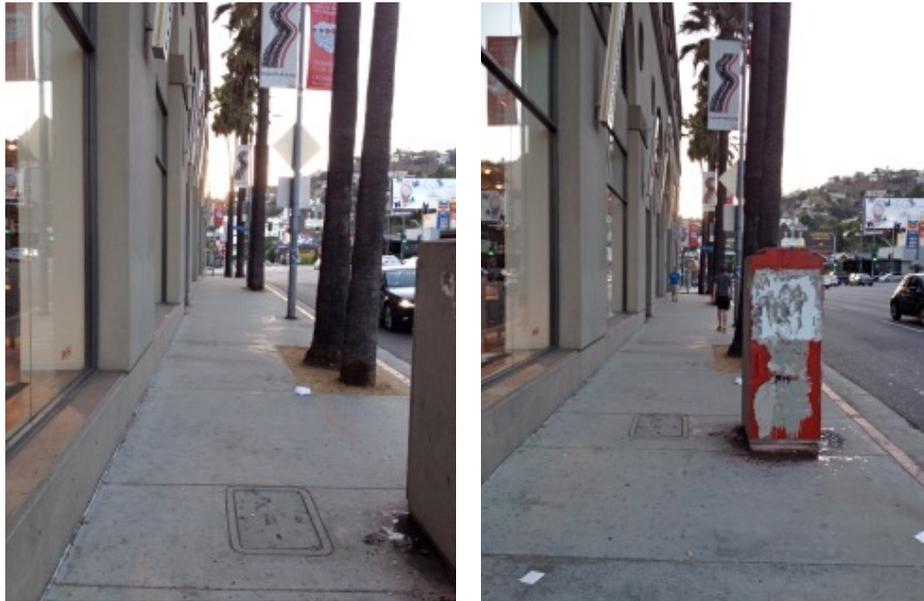
- The local bus late night "Owl Service" only runs every hour after 11:30pm, and has a limited weekend/holiday service.
- There is also no Rapid bus service nights or weekends or holidays
- Rapid bus is constantly redirected for Hollywood Blvd event closures
- Red line doesn't run beyond 11pm

BUS STOP IMPROVEMENTS

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

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

Proposed placement of moved bus stop in front of the 8000 Sunset building



APPLICANT TEXT:

(e) Access

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

SAVE SUNSET BOULEVARD - EIR COMMENTS ON 8150 SUNSET

COMMENT

Sunset Blvd & Fairfax Ave bus stops are not acceptable "high quality or major transit stops"



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



Bus Stop - eastbound on Sunset Blvd at Fairfax



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

SAVE SUNSET BOULEVARD - EIR COMMENTS ON 8150 SUNSET

The proposed re-location of the local bus stop is to a narrow sidewalk that would not accommodate a bus stop with shelter and could also not accommodate pedestrians and bus riders and bicycles. It is also not American Disability Act (ADA) compliant.

ADDITIONAL PUBLIC TRANSIT COMMENTS

The EIR also does not discuss the project's plans for improvements and upgrades to the current bus stops along Sunset Blvd, Crescent Heights, Laurel Canyon, Fairfax Ave and sidewalks that would be needed to accommodate the projects anticipated pedestrians, bike riders and future generated transit use. This must be addressed and circulated in the EIR.

The Bus Stop location should be evaluated as part of the EIR as the adjacent streets are impacted by its location. Moving the location east to mid-block between Crescent Heights and Laurel could work if the right turn lane and triangular median at the east lane of Crescent Heights were improved.

Maintaining the current bus stop location at the project site could accommodate the bus and anticipated new bus riders and riders with bikes. This would mean that residents, employees and patrons wouldn't need to cross Crescent Heights to catch the bus, increasing pedestrian congestion at the already dangerous and overcrowded intersection. A state of the art bus stop could be placed on the current traffic island with using green technologies, such as solar shelter roofs for lighting.

Please study how this new location and improvements might help mitigate impacts for this Project.

ADDITIONAL TRAFFIC FLOW COMMENTS

1.) Removing the traffic island on the south west corner of Sunset Boulevard and Crescent Heights will;

- Make it all but impossible for eastbound traffic on Sunset to turn south, especially for long wheelbase vehicles. This will add congestion to Sunset by forcing all heavy traffic to remain on Sunset until Fairfax, and then adding more traffic to Fairfax. This is must be addressed and circulated in the EIR.
- Any vehicle larger than a small SUV turning south onto Crescent Heights from Sunset will be forced to 'invade' the north-bound lane of opposing traffic.
- The removal of the easy-access right turn lane means all drivers will be forced to wait for ALL PEDESTRIANS crossing Crescent Heights. This takes "forever" as there are always numerous stragglers paying little heed to the duration of the crossing light; so by the time the last pedestrian completes his crossing, the SOUTHBOUND vehicles on Crescent Heights are already crossing the intersection on their way to Fountain Ave. The result will be a massive build-up of the East bound traffic behind the vehicle making the almost impossible right turn.

SAVE SUNSET BOULEVARD - EIR COMMENTS ON 8150 SUNSET

- The traffic island acts as a "safety buffer" and several minutes of "free" time (as the pedestrians take a few minutes to cross the rather large triangle) for the easy-access right turning traffic to accomplish their turns into the Southbound Crescent Heights traffic flow.

2.) The misguided concept of adding yet another traffic light at the corner of Sunset and Havenhurst mentioned both in the EIR and in the HHWNC PLUM meeting on the Jan 8th will have disastrous consequences for the already congested East-West traffic on Sunset Boulevard.

- Besides the stoplight on Crescent Heights, there is another traffic light 2 1/2 blocks west on the corner of Roxbury Road and Sunset Boulevard that creates traffic tie-ups during morning and evening rush hour traffic.
- That light is very badly timed, often unnecessarily long waits for it to change, and that is from a tiny, almost private road with no more than 4-5 residences.
- Adding this new light in an area in two different municipalities will be fraught with massive congestion issues since two of these lights are the province of the City of LA and the third (Roxbury Road) West Hollywood, there is no hope of ever getting the two traffic departments to synchronize the lights - they haven't been able to work it out since the Roxbury light was installed - approximately 8 years ago.
- From the stop light at Crescent Heights and a new one installed on the corner of Havenhurst is around 100 feet. To regulate traffic twice in such a short distance guarantees that there will be traffic trailing into the North-South traffic flow of Crescent Heights at almost every change of the light.
- Drivers will scrunch in to the traffic ahead to 'beat the light', disrupting not only the East-West traffic, but the North-South traffic at the lights, and the pedestrians crossing who'll be endangered as they walk around the gridlock blocking their crosswalk.
- This will all have a massive negative impact the quality of life of the community and the air quality of the neighborhood.

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

4.) There is no safe provision of entry, exit, or riding of the 1,365 bicycles they are proposing to park. There are no bike paths on Sunset and the ridership suggested by the number is not supported by any current use patterns on Sunset. This extraordinarily large quantity is clearly an unrealistic proposal. Real data needs to be evaluated much more accurately and carefully in the EIR.

5.) EIR fails to provide detail on the bus stop. While we understand relocating the bus stop on the east side of crescent heights during construction. Relocating the bus stop permanently will probably not be ADA compliant. You need 7 unobstructed feet. It is on a slope and there is not enough depth of sidewalk.

MAYOR OF WEST HOLLYWOOD JOHN D'AMICO ON TRAFFIC

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

Source: wehoville.com

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

pg 4

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

These comments must be reviewed, addressed and circulated in the EIR.

NOISE

APPLICANT TEXT:

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

- Sunset Terrace - 500 patrons plus event staff, security/safety personnel, etc According to the applicant, the operation hours of the Sunset Terrace would be 10AM to 10PM. (Sunday through Thursday) and 10 AM. to Midnight (Friday and Saturday)
- Rooftop Lounge Terrace - The Rooftop Lounge Terrace would open as early as 10AM to serve breakfast and close as late as 2AM. Noise levels generated by dining activities of approximately 500 people with background music could be as high as 73 dBA at 40 feet from the boundary of the Rooftop Lounge Terrace.
- Pool Terrace - Level 9 - The residential component of the Project would include amenities such as a private pool/pool deck (Pool Terrace) on Level 9. The Pool Terrace is located approximately 94 feet above ground. The nearest residential uses (R4) is located approximately 20 feet from the Pool Terrace.

SAVE SUNSET BOULEVARD - EIR COMMENTS ON 8150 SUNSET

- However, the Pool Terrace is located approximately 74 feet above the top of the nearest residential uses (R4).
- Internal Patios and Central Plaza - The operation hours of Internal Patios and Central Plaza would be 10AM to 2AM daily. Noise generated by operation of the Internal Patios and Central Plaza generally includes music (amplified) and crowds of people (applause and cheer). Noise from amplified music would be controlled by limiting the allowable volume level from equipment. Noise levels generated by crowds (applause and cheers), however, could be as high as 86 dBA (maximum sound level) at the back row of the event terrace based on measurements of similar events.

COMMENTS

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

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

The EIR fail to state what activity will be taking place on the roof.

The EIR fails to state the hours of use/operation of any resident only common area.

The EIR fails to state the policing of the hours of use/operation of any resident only common area, and how the community can control this noise pollution.

The EIR fails to state if any of the projects open spaces can be used for special event parties.

All open space use, including sound and light pollution, especially to residents on the hill who will have a direct line of sight and sound to these areas, must be fully studied, addressed and circulated in the EIR.

SOLAR TECHNOLOGY USE

As an ELDP beneficiary, this building should have all open areas covered in solar panels, but it makes no mention of any solar or other environmentally conscious technology to offset the 11693 new vehicle trips worth of pollution it is going to generate.

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

SAVE SUNSET BOULEVARD - EIR COMMENTS ON 8150 SUNSET

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

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

AFFORDABLE HOUSING

The project's residential unit count appears to be based on density bonuses provided under the City's housing policy. It appears that the total proposed amount of affordable housing at 11% of the total residential units. How does the Applicant arrive at the unit counts that qualify for this bonus?

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

This project does not appear to qualify of an off-menu incentive for Affordable Housing because it is more than 1500 feet from a major transit stop. The Applicant is asking for a Variance in order to qualify for an incentive/bonus density. This is not legal. A developer cannot ask for a variance to qualify for a bonus. This puts the City (and taxpayers) at risk of losing more expensive lawsuits.

The EIR fails to adequately state where the affordable housing units will be placed within the building. Will they be on a separate floor? Will the affordable housing tenants be given less desirable units? Will the affordable housing tenants have the same finishes and appliances as market rate units? Will they share the same entrance, parking, pools and decks? The EIR fails to include adequate information on what services the affordable income tenants will be allowed to use.

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

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

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

EARTHQUAKE - SEISMIC STUDY

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

The EIR fails to estimate emissions if trenching is needed as it is in the Alquist-Priolo Earthquake Zone.

The EIR fails to state what emergency evacuation plans will be as it is in Alquist-Priolo Earthquake Zone.

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

The EIR fails to state evacuation methods pursuant to ADA guidelines within the Alquist-Priolo Earthquake Fault Zoning Act.

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

The EIR also fails to examine the dangers of hydrology on an alluvial fan. The consequence of constructing the correct barrier will lead to a diversion of groundwater and the increased likelihood of liquefaction under neighboring building such at 8000 Sunset, the historic Granville Towers, the Andalusia, the Colonial House etc, etc., in the event of a bad quake, especially following a period of intense rain, which is usual in an El Nino year. This must be addressed in the EIR, and it should be signed off on by the state geologist to ensure that the city will not be open to massive and costly lawsuits in the unfortunate event of any such damage occurring.

COMMUNITY IMPACT

The EIR contains insufficient information to allow the decision makers to reach the correct conclusions and findings regarding the project's impact on both the local historical resources and the existing neighborhood.

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

The EIR incorrectly labels the neighboring homes on Selma, Sunset and Crescent Heights as multi family units, but many of them are single-family residences.

SAVE SUNSET BOULEVARD - EIR COMMENTS ON 8150 SUNSET

There is no discussion in the EIR of the principals noted above from the Hollywood Community Plan, merely a conclusion that the building is not disruptive and causes no significant impact. This conclusion is not supported by any demonstrated facts. An in-depth discussion is needed as to how the proposed building is sympathetic to the scale and form of the existing neighborhood so as to reconcile the erroneous conclusions of 'no impact' or 'less than significant impact' on such a historical neighborhood.

The EIR does not state the economic impact of more traffic, more shade, more glare on buildings on the property values of Havenhurst.

The EIR does not state the impact on hillside residents whose views will be dominated and their property prices devastated by the out-of-scale and context 216 foot tower.

The EIR states that the Billboard on the site was digital and/or illuminated. The billboard is lit up by spotlights at night, but has never been a digital board. What outside advertising there will be? Will there be any digital displays facing the street causing light pollution and visual blight.

The EIR does not state whether cell towers will be placed on the site, this must be addressed for both the present and the future.

The EIR fails to address the "respect other neighbors" policy in Hollywood Community Plan. There is a 10-story West Hollywood height limit that must be addressed and discussed in the EIR.

FIRE AND SAFETY

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

LAFD requires 9000 gallon a minute from 4 hydrants known as the GPM flowing simultaneously. The hydrants currently at the site produce less than 4000 gallons per minute. This is insufficient according to the LA City Fire Code. The EIR does not contain plans to remedy this massive and exceptionally dangerous oversight in public safety. (see attached LAFD letters - Addendum #2)

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

SAFETY DURING CONSTRUCTION

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

Pedestrian safety during construction is not addressed in the EIR

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



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

SAVE SUNSET BOULEVARD - EIR COMMENTS ON 8150 SUNSET



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

A NEW COMPREHENSIVE HISTORIC SURVEY MUST BE COMPLETED BEFORE CERTIFICATION

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

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

The EIR indicates numerous potential and acknowledged historic resources but concludes that no impacts will occur because previous development in the 50's and 60's have nullified a need to preserve our historic buildings, and nullified the need to respect our buildings from the 20's and 30's. Therefore, the EIR does not meet accepted professional standards.

By design, a Survey or Historic Resources Evaluation Report is intended to prioritize the evaluation of properties that are directly impacted by the proposed project. The approach used here is inadequate as a matter of law. The full and complete analysis of the impacts of the project cannot be deferred or separated from approval and certification of the final EIR. In order to comply with law the EIR must adequately and completely fully disclose all potential impacts to the historic resources in the area impacted by the project.

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

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

CONCLUSION

The Department is presenting an EIR to the public which is at best incomplete and at worst both inaccurate and completely unrepresentative of the consequences of the project. A request for certification on such a document is directly contrary to CEQA. "The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure." (CEQA Guidelines, 15151.)

The ultimate decision of whether to approve a project, be that decision right or wrong, is a nullity if based upon an EIR that does not provide the decision-makers, and the public, with the information about the project that is required by CEQA.' "San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus, supra, 27 Cal.App.4th at pp. 721-722, quoting Santiago County Water Dist. v. County of Orange (1981) 118

Cal.App.3d 818, 829 [173 Cal.Rptr. 602]). If the description of the environmental setting of the project site and surrounding area is inaccurate, incomplete or misleading, the EIR does not comply with CEQA. Without accurate and complete information pertaining to the setting of the project and surrounding uses, it cannot be found that the EIR adequately investigated and discussed the environmental impacts of the development project.

SAVE SUNSET BOULEVARD - EIR COMMENTS ON 8150 SUNSET

Save Sunset Boulevard would like to conclude our comments by reminding the City that the force of public opinion is against this completely out of scale development. As of 9pm on Jan 19th 783 letters of objection have been forwarded to the City Planning Office, Tom LeBonge and Jonathan Brand from our website. The full contents of the letter, and also the names, emails and address of the concerned and disgusted citizens in our community are added to the addendum list.

8150 mailing list -- On My Mac (783 messages)

Search

Flagged **This is how many emails the planning department have recieved from our one click letter writing campaign.**

From	Subject	Date Received	Time	Author
Save Sunset Boulevard	Objection to 8150 Sunset Blvd. fro...	Today	8:51 PM	Jonathan Brand
Save Sunset Boulevard	Objection to 8150 Sunset Blvd. fro...	Today	8:47 PM	Jonathan Brand
Save Sunset Boulevard	Objection to 8150 Sunset Blvd. fro...	Today	8:44 PM	Jonathan Brand
Save Sunset Boulevard	Objection to 8150 Sunset Blvd. fro...	Today	8:43 PM	Jonathan Brand
Save Sunset Boulevard	Objection to 8150 Sunset Blvd. fro...	Today	8:40 PM	Jonathan Brand
Save Sunset Boulevard	Objection to 8150 Sunset Blvd. fro...	Today	7:40 PM	Jonathan Brand
Save Sunset Boulevard	Objection to 8150 Sunset Blvd. fro...	Today	7:38 PM	Jonathan Brand
Frank Taplin	8150 Sunset Comments	Today	7:05 PM	srimal.hewawitharana@lacity.org
Save Sunset Boulevard	Objection to 8150 Sunset Blvd. fro...	Today	6:45 PM	Jonathan Brand
Save Sunset Boulevard	Objection to 8150 Sunset Blvd. fro...	Today	6:44 PM	Jonathan Brand

Save Sunset Boulevard December 31, 2014 at 1:45 PM SS

To: Jonathan Brand, planning.envreview@lacity.org, tom.labonge@lacity.org and 2 more...

Reply-To: auntiemer4x@yahoo.com

Objection to 8150 Sunset Blvd. from Meryl S. Cohen

From:
Meryl S. Cohen
auntiemer4x@yahoo.com
1416 N. Havenhurst Drive
West Hollywood
CA
90046

To:
The City Planning Department, Councilman Tom LaBonge, and Jonathan Brand,

I strongly object to the oversized and completely out of context development being proposed for the south-west junction of Sunset & Crescent Heights on these grounds;

This EIR makes reference to general conformance, yet general conformance is not the standard on which a project may be approved. In the EIR there is no serious respect given to the historical context for a development of this scale, mass or design. This project stands in direct conflict to the Hollywood General Plan and CEQA.

HEIGHT
The land use detailed in the 8150 Sunset Blvd EIR is simply too excessive. At 216 feet this will be the tallest skyscraper on the historically low rise Sunset Strip.

8150 is applying for a permit to build condominiums. I ask that the city of Los Angeles reject this permit because on the way in which the approval process for rentals and condominiums differs. The EIR Represents the project as 16 stories when it is actually over a realistic 20 stories at 10 feet per story. I believe this to be an intentional misrepresentation to confuse the public, and because of this I demand a new EIR that correctly states the height without this misleading and incorrect figure of just sixteen stories.

HISTORICAL RESOURCE DISTRICT
The Chateau Marmont and the surrounding French Chateau style apartment buildings represent some of Los Angeles's premier historical treasures, so to tower over them with a massive skyscraper will be a blight upon the area and a tragedy of urban design that cannot be undone. The EIR does not accurately represent the destruction to the neighborhood that this project will cause. The current design will have a disastrous effect on the historical nature of the immediate surroundings by:

- Demolishing the Lytton Building.
- The EIR fails to correctly address the aesthetic and financial effects of blocking the light and views of the historic Chateau Marmont, the Colonial House, Andalusia, Mi Casa, Chateau Marmont, The Granville, and The Savoy and countless hillside residents.
- The shading the Chateau Marmont, Colonial House, and The Andalusia will completely destroy one of the most open and spacious areas of

SAVE SUNSET BOULEVARD - EIR COMMENTS ON 8150 SUNSET

Addendum list, submitted by email and in person.

1. Allyn Rifkin Traffic Report
2. Letter from LA City Fire Department #1
3. Letter from LA City Fire Department #2
4. City of Los Angeles General Plan Framework
5. 1988 (currently in force) Hollywood Community Plan
6. Council Member Tom LeBonge's letter
7. City of West Hollywood letter
8. City of LA ELDP notification
9. City of LA Traffic Assessment
10. The full list of the 783 petitioners who joined the "Letter of Objection" campaign to the city through Save Sunset Boulevard's website.