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CITY OF LOS ANGELES
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200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801

VINCENT P. BERTONI, AICP
DIRECTOR
(213) 978-1271

KEVIN J. KELLER, AICP
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(213) 978-1272

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

JAN ZATORSKI
DEPUTY DIRECTOR
(213) 978-1273

<http://planning.lacity.org>

June 21, 2016

Scott Lunceford, AICP
City of West Hollywood
Community Development Department
8300 Santa Monica Boulevard
West Hollywood, CA 90069-6216

Mr. Lunceford,

Thank you for your letter, dated May 23, 2016, relative to the City of Los Angeles' processing and consideration of the 8150 Sunset Boulevard Mixed-Use Project (Case Nos. VTT-72370-CN, CPC-2013-2551-MCUP-DB-SPR, and ENV-2013-2552-EIR). Department of City Planning staff would like to address the concerns raised in your letter and respectfully requests your cooperation in providing us with additional information for further consideration.

We understand the City of West Hollywood takes issue with the following areas of the EIR that was prepared for the project:

- Signalization of Fountain and Havenhurst, where we propose the installation of a traffic signal at the intersection of Fountain Avenue and Havenhurst Drive
- Traffic impacts along Fountain Avenue
- Upgrade the existing mid-block pedestrian crosswalk at Crescent Heights Boulevard
- Fair-share contribution to the City of West Hollywood for ongoing operation and maintenance of the City of West Hollywood's sewer system
- Elimination of site access along Havenhurst Drive
- Require deliveries and services to only ingress and egress the project via driveways on Sunset Boulevard and Crescent Heights Boulevard
- Fund upgrades to traffic signal controller equipment, replacement of existing controllers, and installation of battery back-up systems

Signalization of Fountain/Havenhurst Intersection:

In order to address the potential impact at the currently unsignalized intersection of Fountain Avenue and Havenhurst Drive, our Department of Transportation (LADOT) recommended that a traffic signal be installed at this intersection. The EIR identifies LADOT as the enforcement agency for the proposed traffic signal installation. Your letter states that the City of West Hollywood does not support and will not approve the proposed traffic signal installation. Recognizing that this intersection is located within the City of West Hollywood and that you may have an alternative or substitute mitigation that you would like to be considered, we have revised our mitigation measure to read as follows:

Mitigation Measure TR-1: The Los Angeles Department of Transportation (LADOT) identified that the project may result in a significant impact at the unsignalized intersection of Fountain Avenue and Havenhurst Drive south of the

project site within the City of West Hollywood. LADOT proposes the installation of a new traffic signal at this intersection to off-set the potential impact, subject to review and approval by the City of West Hollywood. The applicant shall guarantee (by bond, cash or irrevocable letter of credit, subject to the approval of the City of West Hollywood) the necessary funding to enable the City of West Hollywood to design and install improvements at the intersection of Fountain Avenue and Havenhurst Drive.

Moreover, the Mitigation Monitoring Program has been corrected to identify the City of West Hollywood as both the Enforcement Agency and as a Monitoring Agency.

Enforcement Agency: City of West Hollywood

Monitoring Agency: Los Angeles Department of Transportation; City of West Hollywood

Monitoring Phase: Prior to occupancy

Monitoring Frequency: Once prior to occupancy

Action Indicating Compliance: Field inspection sign-off and compliance certification report submitted by project contractor

Your letter did not propose a substitute mitigation that would reduce impacts to less than significant levels at the intersection of Fountain Avenue and Havenhurst Drive, and we would appreciate understanding what the City of West Hollywood would propose instead in order to fully inform our decision makers.

Traffic Impacts along Fountain Avenue

The City of Los Angeles acknowledges that the traffic study prepared for the project did not include the intersections of Fountain/Olive and Fountain/Laurel. Your letter states that these intersections will be impacted and you would like the developer "to fund the upgrade of the traffic signal controller equipment, replacing existing 170 controllers with 2070 controllers, as well as fund installation of battery back-up systems for the following City of West Hollywood signalized intersections: Fountain/La Cienega, Fountain/Olive; Fountain/Sweetzer; Fountain/Crescent heights; and Fountain/Laurel..." The intersections of Fountain/La Cienega, Fountain/Sweetzer, and Fountain/Crescent Heights are located in the City of West Hollywood and were analyzed in the EIR in conformance with the City of West Hollywood's traffic study analysis procedures. These intersections were determined to not result in significant intersection impacts based on the City of West Hollywood's established traffic study methodologies.

In order to consider the City of West Hollywood's request, we respectfully request the traffic study or traffic analysis that was prepared in order to determine the impacts to Fountain/Olive and Fountain/Laurel, the methodology used and analysis that was conducted to warrant these upgrades, and what impacts would be mitigated by requiring these upgrades to the other intersections mentioned in your letter, including: Fountain/La Cienega, Fountain/Sweetzer, and Fountain/Crescent Heights.

Safe Pedestrian Access

The City of West Hollywood requests that the developer upgrade the current mid-block crosswalk along Crescent Heights to a mid-block pedestrian signal, and provide visibility enhancements, such as sidewalk bulb-outs, refuge island, reflective markings, etc. This was a comment raised by your agency during the Draft EIR, and which was responded to in the Final EIR as Response No. A9-11. The Final EIR responded that absent evidence of a significant pedestrian-related impact, there was no nexus requiring the proposed upgrade to this mid-block pedestrian crosswalk. Should the City of West Hollywood have a pedestrian traffic study or

similar analysis, using an established threshold above which impacts are considered to be significant under the City of West Hollywood's CEQA methodologies, we respectfully request that the study or analysis be shared with the City of Los Angeles so that we may consider a full range of feasible mitigation in order to best inform our decision makers.

Utilities and Service Systems – Wastewater

The City of West Hollywood requests the installation of a new 8-inch diameter sewer aligned in Crescent Heights Boulevard in the City of Los Angeles, or a requirement of the applicant to pay the City of West Hollywood a "fair-share" cost of on-going operation and maintenance of the City of West Hollywood-owned sewer system. At the public hearing held for the project on May 24, 2016, a representative from the City of West Hollywood indicated that the City of West Hollywood has an established requirement that projects pay a fair-share contribution to the City of West Hollywood's sewer system.

The EIR fully evaluated impacts to wastewater systems, including those within the City of West Hollywood. As detailed in the Recirculated Portions of the Draft EIR Appendix C, the project's wastewater contribution would be approximately 2% of the remaining 46% capacity of downstream sewers in the City of West Hollywood, and impacts would be less than significant. However, to ensure that project is subject to the same fair-share contribution as other projects which use City of West Hollywood sewers, the EIR includes a Project Design Feature that has been revised to read as follows:

PDF-WW-1: In order to address potential future improvements to sewage conveyance facilities within the City of West Hollywood that serve the project site, the project shall contribute fair-share payments to the City of West Hollywood commensurate with the project's incremental impact to affected facilities. Prior to the issuance of building permits, the applicant shall enter into an agreement with the City of West Hollywood determining the project's specific fair-share contribution for West Hollywood sewage system upgrades. The fair share contribution shall be calculated in the same manner used to calculate the fair share contribution for development projects within the City of West Hollywood, and the project's specific contribution shall be determined at such a time that the necessary improvements and associated capital costs are known, and shall be proportional to the project's contribution to total wastewater flows in each affected West Hollywood-owned sewer. The applicant shall guarantee (by bond, cash or irrevocable letter of credit, subject to the approval of the City of West Hollywood) the necessary funding to enable the City of West Hollywood to design and install the necessary improvements.

Enforcement Agency: Los Angeles Department of Public Works; City of West Hollywood

Monitoring Agency: Los Angeles Department of City Planning; Los Angeles Department of Public Works; City of West Hollywood

Monitoring Phase: Pre-Construction

Monitoring Frequency: Once, prior to issuance of building permits

Action Indicating Compliance: Agreement with City of West Hollywood or documentation of fair-share payments

Site Access and Deliveries on Havenhurst Drive

The City of West Hollywood requests the elimination of site access along Havenhurst Drive, and further requests that deliveries and services be required to access the project via driveways on Sunset Boulevard and Crescent Heights Boulevard.

The project site currently has an ingress/egress driveway on Havenhurst Drive, located at the southernmost part of the site in a similar location to that of the proposed project's condominium driveway. The existing driveway is limited to right-turn entry into the project site and right-turn

only exit moves out of the project site, a condition that the project would further improve upon by providing a physical barrier to ensure that vehicles exiting from the project's Havenhurst Drive driveways do not make left-turns onto southbound Havenhurst Drive. Under existing conditions, the project site also has driveways on Sunset Boulevard and Crescent Heights Boulevard.

The project has proposed the following Project Design Feature to minimize traffic on Havenhurst Drive:

PDF-Traffic-1: In order to ensure the vehicles exiting from the project's Havenhurst Drive driveways do not make left-turns onto southbound Havenhurst Drive, the applicant shall construct a physical barrier or other equivalent improvement, subject to review and approval by LADOT.

In addition, the EIR evaluated local/residential street traffic impacts for four street segments within the City of West Hollywood. These neighborhood street segments were evaluated in conformance with the City of West Hollywood Local/Residential Street Significant Impact Criteria.

- Havenhurst Drive, between Fountain Avenue and the project site
- Fountain Avenue, between Harper Avenue and Havenhurst Drive
- Fountain Avenue, between Havenhurst Drive and Crescent Heights Boulevard
- Fountain Avenue, between Crescent Heights Boulevard and Laurel Avenue

As detailed in the EIR, the proposed project would not exceed thresholds of significance on any of the analyzed street segments. Absent evidence of a significant impact, there is no nexus to require the access restrictions to the public right-of-way proposed by the City of West Hollywood.

Notwithstanding the lack of significant impacts to neighborhood streets, the project has taken measures to respond to concerns on traffic in abutting residential areas on Havenhurst Drive. In addition to the Project Design Feature detailed above, the proposed project has eliminated access to commercial and retail uses from the Havenhurst Drive driveways. It should be noted that commercial uses generally have higher trip generation rates than the residential uses which would be able access the site from Havenhurst Drive under proposed conditions. With respect to the loading driveway, all vehicle maneuvers would take place within the Basement Level 2 internal loading dock and trash sorting area. As detailed in the EIR, no noise or traffic impacts are expected as a result of this driveway. In addition, as discussed in the Draft EIR Section 4.J, limited loading/unloading at the project site is limited to off-peak hours in order to further minimize impacts to Havenhurst Drive.

Again, we appreciate your comments and continued input on this project. As you know, this project is scheduled for a hearing before the City Planning Commission on July 28, 2016. The Department of City Planning respectfully requests your cooperation in providing us with additional information requested herein for further consideration relative to the points discussed above so that we may fully inform our decision makers and interested parties.

Sincerely,



Luciralia Ibarra
Senior City Planner
Department of City Planning
Luciralia.ibarra@lacity.org