

LETTER 1

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Arnold
Schwarzenegger
Governor



Jan Boel
Acting Director

October 18, 2004

Jimmy C. Liao
Los Angeles City Planning Department
Environmental Review Station
200 North Spring Street, Rm 761
Los Angeles, CA 90012

RECEIVED
CITY OF LOS ANGELES
OCT 20 2004
ENVIRONMENTAL
UNIT

Subject: Tower of Wooden Pallets Apartments
SCH#: 2003121098

Dear Jimmy C. Liao:

1-1

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on October 15, 2004, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

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

Sincerely,

Terry Roberts
Director, State Clearinghouse

Document Details Report
State Clearinghouse Data Base

SCH# 2003121098
Project Title Tower of Wooden Pallets Apartments
Lead Agency Los Angeles City Planning Department

Type EIR Draft EIR
Description Site Plan Review for a 98-unit (original 78 units + 25% density bonus with five units designated as "affordable disabled"), three-story apartment building with 185 subterranean parking stalls in the R3-1 Zone, on a 1.43- acre site. The site contains Los Angeles Historic-Cultural Monument No. 184, "Tower of Wooden Pallets", a single-family structure, and sheds, all proposed to be demolished (but the monument will not be declassified).

Lead Agency Contact

Name Jimmy C. Liao
Agency Los Angeles City Planning Department
Phone (213) 978-1331 **Fax**
email
Address Environmental Review Station
200 North Spring Street, Rm 761
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of
Region
Cross Streets Sepulveda Boulevard

Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways 405
Airports
Railways
Waterways
Schools Kester Elementary, Van Nuys Middle, Van Nuys High
Land Use R3-1 / Multi-Family Residential

Project Issues Aesthetic/Visual; Air Quality; Geologic/Seismic; Growth Inducing; Noise; Population/Housing Balance; Public Services; Schools/Universities; Toxic/Hazardous; Traffic/Circulation

Reviewing Agencies Resources Agency; Regional Water Quality Control Board, Region 4; Department of Parks and Recreation; Native American Heritage Commission; Department of Housing and Community Development; Office of Historic Preservation; Department of Fish and Game, Region 5; Department of Water Resources; California Highway Patrol; Caltrans, District 7

Date Received 09/01/2004 **Start of Review** 09/01/2004 **End of Review** 10/15/2004

LETTER 2

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
 DISTRICT 7, REGIONAL PLANNING
 IGR/CEQA BRANCH
 120 SO. SPRING ST.
 LOS ANGELES, CA 90012
 PHONE (213) 897-6536
 FAX (213) 897-1357
 E-Mail: Nerces.Yerjanian@dot.ca.gov



RECEIVED
 CITY OF LOS ANGELES

SEP 29 2004

ENVIRONMENTAL
 UNIT

*Flex your power!
 Be energy efficient!*

Mr. Jimmy C. Liao
 LA Department of City Planning
 200 N. Spring St. Room 761
 Los Angeles, CA. 90012

IGR/CEQA# 040903NY
 DEIR/ Tower of Wooden Pallets Apartments
 SCH#2003121098
 LA/405/41.5

September 24, 2004

Dear Mr. Liao:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Tower of Wooden Pallets Apartments project.

2-1

We have reviewed the project's traffic study that you provided. The Department as a responsible agency under CEQA has jurisdiction superceding that of MTA in identifying the freeway analysis needed for this project. Caltrans is responsible for obtaining measures that will off-set project vehicle trip generation that worsens Caltrans facilities and hence, it does not adhere to the CMP guide of 150 or more vehicle trips added before freeway analysis is needed. MTA's Congestion Management Program in acknowledging the Department's role, stipulates that Caltrans must be consulted to identify specific locations to be analyzed on the State Highway System.

2-2

Please provide Queue length analysis at the On/Off ramp intersections, and propose mitigation measures, calculate a pro-rata share to be paid by this project. It is also necessary to verify the three small-Related Projects (No. 3,4,& 5) that are listed on Table 2 of the DEIR since Mr. Kevin Ecker of the City of LA has indicated these 3 projects have not yet been developed.

2-3

2-4

Please reference the Department's Traffic Impact Study Guideline on the Internet at <http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf>

We request that you apply the equitable share responsibility formula on page 2 of Appendix B (Methodology for Calculating Equitable Mitigation Measures) and set

LETTER 2

Mr. Liao

September 24, 2004

2-4

aside a portion of Transportation Impact Fees generated for the future State Highway improvement projects. The City may need to recalculate or establish an additional fee for this purpose.

If you have any questions regarding this response, please call the Project Engineer/Coordinator Mr. Yerjajian at (213) 897-6536 and refer to IGR/CEQA # 040903NY.

Sincerely,



Cheryl J. Powell

IGR/CEQA Branch Chief

Regional Transportation Planning

LETTER 3

SOUTHERN CALIFORNIA



ASSOCIATION OF GOVERNMENTS

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12th Floor

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3-1

Orange County: Chris Norris, Orange County • Marjory Pelt, Los Alamitos • Lou Bone, Tustin • Art Brown, Buena Park • Richard Chavez, Anaheim • Debbie Cook, Huntington Beach • Cathryn DeYoung, Laguna Hills • Richard Dixon, Lake Forest • Alta Dulin, La Palma • Bev Perry, Brea • Ted Higgins, Newport Beach

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Ventura County: Jerry Ahlrich, Ventura County • Glen Bacerra, Steel Valley • Carl Morehouse, San Buenaventura • Ford Young, Port Huamane

Orange County Transportation Authority: Charles Smith, Orange County

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Bill Davis, Santa Ynez

September 21, 2004

Mr. Jimmy C. Liao, Project Coordinator
Room 761, City Hall
Department of City Planning
200 North Spring Street
Los Angeles, CA 90012

RECEIVED
CITY OF LOS ANGELES

SEP 22 2004

ENVIRONMENTAL
UNIT

RE: SCAG Clearinghouse No. I20040586 Tower of Wooden Pallets Apartments

Dear Mr. Liao:

Thank you for submitting the Tower of Wooden Pallets Apartments for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the Tower of Wooden Pallets Apartments, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). The proposed project is not a residential development of more than 500 dwelling units. Therefore, the proposed Project does not warrant comments at this time. It is not necessary to send/provide us a copy of the Final EIR for this Project. However, please provide us with a Notice of Availability for the Final EIR. Please be sure that the Notice includes a complete project description and comment due date. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's September 1-15, 2004 Intergovernmental Review Clearinghouse Report for public for review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1867. Thank you.

Sincerely,

JEFFREY M. SMITH, AICP
Senior Regional Planner
Intergovernmental Review

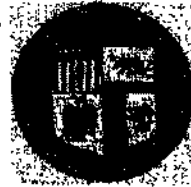
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WILLIAM F. BAMBATTRE
FIRE CHIEF

200 NORTH MAIN STREET
LOS ANGELES, CA 90012

(213) 485-8008
FAX: (213) 485-8247

<http://www.lafd.org>

September 3, 2004

Jimmy C. Liao, Project Coordinator
Department of City Planning
200 North Spring St., Room 761
Los Angeles, CA 90012

**REPLY TO DRAFT ENVIRONMENTAL IMPACT REPORT TOWER OF WOODEN
PALLET APPARTMENT PROJECT - 15357 W. Magnolia Blvd.**

Dear Mr. Liao:

The section of this draft EIR concerning fire protection contains an incorrect citation and several omissions.

4-1

This report incorrectly states that the Los Angeles Municipal Code (LAMC), Section 57.09.07 states that the Fire Department response standard for residential neighborhoods is within 1.5 miles from an engine company and 2.0 miles from a truck company. The response standard set forth in the municipal code for residential development is 1.5 miles from the closest fire station housing an engine or a truck (57.09.07, Table 9-C, LAMC). A copy of Table 9-C is attached for reference.

4-2

In the section listing proposed mitigation measures there are items listed which were not included in our reply dated December 22, 2003 and several items which have been omitted. Please ensure that this portion of the report is revised to accurately reflect the recommendations of the Fire Department included in our original correspondence, a copy of which is attached.

If you have any questions please call me at (213) 482-6506.


Richard Griffin, Inspector
Hydrant and Access Unit

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MAYORDEPARTMENT OF FIRE
200 NORTH MAIN STREET
LOS ANGELES, CA 90012WILLIAM R. Bamatyre
FIRE CHIEF(213) 485-8003
FAX: (213) 486-8247

http://www.hahnd.org

December 22, 2003

Jimmy Liao, Projects Coordinator
Planning Department
200 N. Spring Street, #763
Los Angeles, CA 90012**TOWER OF WOODEN PALLETS APARTMENTS****PROJECT LOCATION**

15357 W. Magnolia Boulevard

PROJECT DESCRIPTION

A 98-unit, 3-story apartment building with subterranean parking on a 62,477 square foot lot. Site presently contains Los Angeles Historic-Cultural Monument No. 184, "Tower of Wooden Pallets" which is to be demolished.

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

A. Fire Flow

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

~~Fire flow requirements vary from 2,000 gallons per minute (G.P.M.) in low Density Residential areas to 12,000 G.P.M. in high-density commercial or industrial areas. A minimum residual water pressure of 20 pounds per~~

Jimmy Liao
December 22, 2003
Page 2

square inch (P.S.I.) is to remain in the water system, with the required gallons per minute flowing. The required fire-flow for this project has been set at 4,000 G.P.M. from 4 fire hydrants flowing simultaneously.

B. Response Distance, Apparatus, and Personnel

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

Fire Station No. 88
5101 N. Sepulveda Boulevard
Sherman Oaks, CA 91403
Task Force Truck and Engine Company
Paramedic Rescue Ambulance
Division 3 Headquarters
Staff - 13
Miles - .91

Fire Station No. 39
14415 Sylvan Street
Van Nuys, CA 91401
Task Force Truck and Engine Company
Hazardous Materials Squad
Paramedic Rescue Ambulance
Battalion 10 Headquarters
Staff - 17
Miles - 2.48

Fire Station No. 83
5001 Balboa Boulevard
Encino, CA 91316
Single Engine Company
Staff - 4
Miles - 2.95

The above distances were computed to 15357 Magnolia Boulevard.

C. Firefighting Access

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

Jimmy Liao
December 22, 2003
Page 3

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

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

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

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

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

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

No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along path of travel. Exception: Dwelling unit travel distance shall be computed to front door of unit.

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

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

Submit plot plans for Fire Department approval of access and fire hydrants.

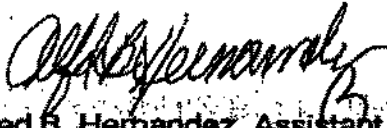
CONCLUSION

The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles C.P.C. 19708.

Jimmy Liao
December 22, 2003
Page 4

For additional information, please contact Inspector Griffin of the Construction Services Unit at (213) 482-6506.

WILLIAM R. BAMATTRE
Fire Chief



Alfred B. Hernandez, Assistant Fire Marshal
Bureau of Fire Prevention and Public Safety

ABH:RG:gm
tower wooden pallets apts

LETTER 4

**PROPOSED TABLE 9-C
RESPONSE DISTANCES THAT IF EXCEEDED REQUIRE THE
INSTALLATION OF AN AUTOMATIC FIRE SPRINKLERS SYSTEM**

* Land Use	Required Fire Flow	** Maximum Response Distance to LAFD Fire Station:	
Residential		Housing an Engine or Truck Company	
Low Density Residential	2,000 g.p.m. from three adjacent hydrants flowing simultaneously	1 1/2 miles	
High Density Residential and Neighborhood Commercial	4,000 g.p.m. from four adjacent hydrants flowing simultaneously	1 1/2 miles	
Commercial		*** Housing an Engine Company and Truck Company	
		Engine Company	Truck Company
Industrial and Commercial	6,000 to 9,000 g.p.m. from four hydrants flowing simultaneously	1 mile	1 1/2 miles
High Density Industrial and Commercial or Industrial (Principal Business Districts or Centers)	12,000 g.p.m. available to any block (where local conditions indicate that consideration must be given to simultaneous fires, an additional 2,000 to 8,000 g.p.m. will be required)	3/4 mile	1 mile

* Land use designations are contained in the community plan elements of the General Plan for the City of Los Angeles.

** The maximum response distance to LAFD fire stations pertains to areas outside the boundaries covered by the Hillside Ordinance (Ordinance Number 168,159). When a portion of any subdivision, as that term is defined in Section 17.02 of the Los Angeles Municipal Code, falls outside of the one and one-half mile distance requirement, automatic fire sprinklers will not be required in that portion whenever a

LETTER 5

From: "Glauz, Gayle" <Gayle.Glauz@WATER.LADWP.com>
To: <Jliao@Planning.lacity.org>
Date: 9/23/2004 8:34:11 AM
Subject: EIR for Tower of Wooden Pallets Apartments

Hi Jimmy,

I'm reviewing the EIR for this project and plan to prepare a formal response.

However, I noticed that Section II-B, Related Projects, did not mention the CalTrans project "405/101 Connector Widening Project" that is due to start construction in January 2005 and continue for approximately 2-years. Also related to the CalTrans project is E6000869 "Sepulveda Blvd from 250' N/O Dickens to 500' S/O Greenleaf St." I understood that this City project would be constructed in conjunction with the CalTrans project. But it's been almost 2-years since we attended the pre-design meeting and have not received any additional information. I left a message for Contract Administration to let me know the status of E6000869.

5-1

Please let me know if you have any questions or additional information.
Thanks!

Gayle Glauz
Water Distribution Engineering, West Valley District
(213) 367-1244 gayle.glauz@ladwp.com

CC: "Shane Etemad" <Setemad@eng.lacity.org>

LETTER 6

October 8, 2004

Department of City Planning
200 North Spring Street, Room 761
Los Angeles, California 90012
Attention: Jimmy Liao, Project Coordinator

Comments on Draft Environmental Impact Report
EIR Case No. EIR-2003-0742: Tower of Wooden Pallets Apartments

This is in response to your letter of August 31, 2004, requesting comments on the draft environmental impact report for the above-referenced project. This response applies only to the Water Services Organization of the Department of Water and Power (WSO). The Energy Services Organization will respond separately.

6-1

This project is within the 1000 Service Zone of the WSO's water distribution system which provides domestic, fire and irrigation flows. The WSO maintains a 12-inch water distribution main within Magnolia Boulevard, approximately 10-feet south of the centerline, and other water facilities within the vicinity. However, further analysis of the water distribution system may be necessary to determine if upgrades to the water system are required to meet the water flow demands for the project. Normally, these water flow demands are finalized during the City's subdivision process.

In addition, an information sheet on water conservation methods is attached.

If you have any questions, you may contact me at (213) 367-1244.

Sincerely,

Gayle Glauz

West Valley District Engineer
Water Distribution Engineering

IMPACT ON THE WATER SYSTEM

If the estimated water requirements for the proposed project can be served by existing water mains in the adjacent street(s), water service will be provided routinely in accordance with the Department of Water and Power's (DWP's) *Rules Governing Water and Electric Service*. If the estimated water requirements are greater than the available capacity of the existing distribution facilities, special arrangements must be made with the DWP to enlarge the supply line(s). Supply main enlargement will cause short-term impacts on the environment due to construction activities.

LETTER 6

In terms of the City's overall water supply condition, the water requirement for any project which is consistent with the City's General Plan has been taken into account in the planned growth of the Water System. Together with local groundwater sources, the City operates the Los Angeles-Owens River Aqueduct and is a member of the Metropolitan Water District of Southern California (MWD). These three sources will supply the City's water needs for many years to come.

Statewide drought conditions in the mid-1970s and late 1980s dramatically illustrated the need for water conservation in periods of water shortage. However, water should be conserved in Southern California even in years of normal climate because electrical energy is required to deliver supplemental MWD water supplies to the City and the rest of Southern California. Conserving water will minimize purchases from MWD and contribute to the national need for energy conservation.

WATER CONSERVATION

The Water System will assist residential, commercial, and industrial customers in their efforts to conserve water. Recommendations listed below are examples of steps which would conserve water in both new and old construction:

1. Automatic sprinkler systems should be set to irrigate landscaping during early morning hours or during the evening to reduce water losses from evaporation. However, care must be taken to reset sprinklers to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation.
2. Reclaimed water should be investigated as a source to irrigate large landscaped areas.

LETTER 6

3. Selection of drought-tolerant, low water consuming plant varieties should be used to reduce irrigation water consumption. For a list of these plant varieties, refer to Sunset Magazine, October 1976, "Good Looking - Unthirsty," pp. 78-85, or consult a landscape architect.
4. Recirculating hot water systems can reduce water waste in long piping systems where water must be run for considerable periods before hot water is received at the outlet.
5. Lower-volume water closets and water-saving shower heads must be installed in new construction and when remodeling.
6. Plumbing fixtures should be selected which reduce potential water loss from leakage due to excessive wear of washers.

In addition, the provisions contained in the Water Conservation Ordinance of April 1988 must be adhered to.

More detailed information regarding these and other water conservation measures can be obtained from the DWP's Water Conservation Office by calling (213) 367-0944.



LETTER 7


HISTORIC PRESERVATION

City Hall • 200 N. Spring Street, Room 667 • Los Angeles, CA 90012



October 14, 2004

TO: Jimmy C. Liao
Project Coordinator

FROM: Lambert M. Giessinger, Architect 
Deputy Historic Preservation Officer

SUBJECT: TOWER OF WOODEN PALLETS APARTMENTS
EIR-2003-0742

Thank you for the opportunity to comment on the above-referenced Draft EIR. The following comments are offered for your review:

7-1 Section VI - ALTERNATIVES TO THE PROPOSED PROJECT does not adequately address the Restoration/Preservation Alternative. It states that this alternative was rejected due to the advanced state of deterioration of the monument and the inaccessibility as a result of trash and debris on the site. If the trash and debris were removed, could alternatives to the stabilization/preservation of the monument be explored? There is no analysis, beyond the statement that the monument is deteriorated, to substantiate that it cannot be preserved.

7-2 Additionally, there is no analysis to show a feasible development around a preserved monument. Under CEQA, and recognized preservation practice in California, this may suggest the superior alternative. If there are any questions, I may be reached at (213) 978-1200.

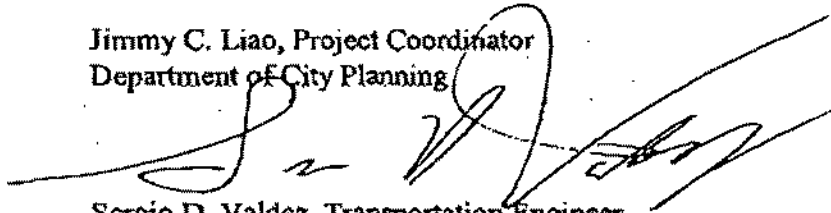
LETTER 8

CITY OF LOS ANGELES INTER-DEPARTMENTAL CORRESPONDENCE

Riverside Dr & Fulton Ave
DOT Case No. SFV 04-235
DOT Case No. SFV 03-027

Date: October 15, 2004

To: Jimmy C. Liao, Project Coordinator
Department of City Planning



From: Sergio D. Valdez, Transportation Engineer
Department of Transportation

Subject: **TOWER OF WOODEN PALLETS APARTMENTS DRAFT ENVIRONMENTAL IMPACT REPORT COMMENTS**

The Department of Transportation (DOT) has completed the traffic assessment for the proposed new 98-unit apartment project located at 15357 Magnolia Boulevard. The Draft Environmental Impact Report (DEIR) Comments are based on DOT's Traffic Assessment dated November 3, 2003.

8-1 After a careful review of the pertinent data, DOT has determined that the DEIR, adequately describes the project traffic-related impacts of the proposed development. However, Table IV.K-3 Critical Movement Analysis Summary Existing (2003) Conditions incorrectly states the a.m. and p.m. peak hour existing levels of service for Sepulveda and Magnolia Boulevards. Furthermore, Table IV.K-5 Related Projects incorrectly states that Related Project numbers 4 and 5 were developed at the time of the study. The attached DOT Traffic Assessment dated July 19, 2000 summarizes the volume-to-capacity (V/C) ratios and levels of service (LOS) at the study intersections, as well as the results of the traffic study analysis.

8-2

8-3 DOT has determined that the proposed project will significantly impact the intersection of Sepulveda Boulevard and Magnolia Boulevard. The intersection was mitigated to a less-than-significant level when the applicant funded a proportionate share of the cost for the design and construction of the Victory/Ventura Corridor ATCS Upgrade of Sepulveda Boulevard and Magnolia Boulevard. The project's proportionate share of the cost for the Victory/Ventura Corridor ATCS Upgrade is equal to the average ATCS Upgrade cost per intersection. In December of 2003, DOT received a cash payment of \$20,000 to guarantee the ATCS improvements.

This determination does not include approval of the project's driveways, internal circulation, or parking scheme. Final DOT approval shall be obtained prior to issuance of any building permits. This should be accomplished by submitting detailed site and driveway plans, with a minimum scale of 1"=40', to DOT's Valley Development Review Section at 6262 Van Nuys Boulevard Suite 320, Van Nuys, CA 91401.

If you have any further questions, you may contact Kevin Ecker of my staff at (818) 374-4699.

Attachment
SV:kc
SFV 04-235 DEIR

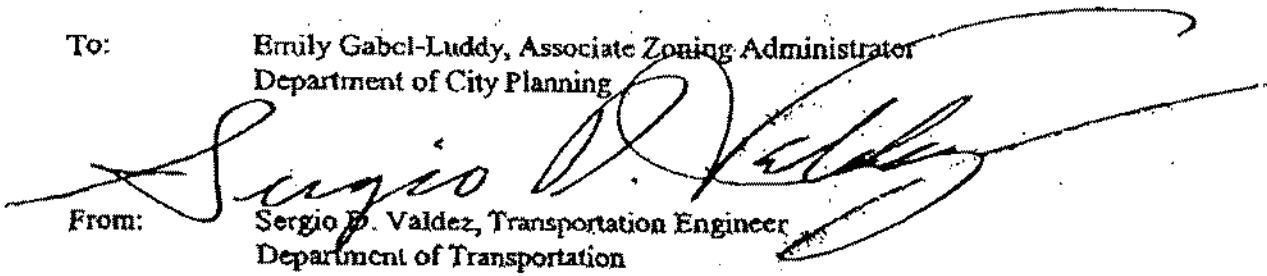
LETTER 8

CITY OF LOS ANGELES INTER-DEPARTMENTAL CORRESPONDENCE

Sepulveda Blvd & Magnolia Blvd
DOT Case No. SFV 03-027

Date: November 3, 2003

To: Emily Gabel-Luddy, Associate Zoning Administrator
Department of City Planning



From: Sergio B. Valdez, Transportation Engineer
Department of Transportation

Subject: **TRAFFIC ASSESSMENT FOR THE PROPOSED NEW 98-UNIT APARTMENTS AT 15357 MAGNOLIA BOULEVARD**

The Department of Transportation (DOT) has completed the traffic assessment for the proposed 98-unit apartment building at 15357 Magnolia Boulevard. This traffic assessment is based on a traffic study prepared by Coco Traffic Planners, dated June 2003, revised July 2003 and October 2003. After a careful review of the pertinent data, DOT has determined that the traffic study, as revised by DOT, adequately describes the project related traffic impacts of the proposed development. The revisions include the rejection of the submitted traffic counts for the intersection of Sepulveda Boulevard and Magnolia Boulevard, which were counted during major roadwork construction on Magnolia Boulevard. Instead, traffic counts previously submitted to DOT, taken November 2002, were used. Although traffic generated by the proposed project will significantly impact one intersection, the project-related traffic impact can be mitigated to a less-than-significant level.

DISCUSSION AND FINDINGS

The proposed project will consist of the new construction of a 98-unit apartment building west of Sepulveda Boulevard on Magnolia Boulevard, on an existing vacant site. The proposed project will generate an additional 722 daily trips with 52 trips in the a.m. peak hour and 72 trips in the p.m. peak hour, as shown below. The trip generation estimates are based on formulas published by the Institute of Transportation Engineers (ITE) Trip Generation, 6th Edition, 1997.

Land Use	Size (sq ft)	Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
			In	Out	Total	In	Out	Total
Apartments	98 units	722	8	44	52	48	24	72

DOT has determined that the proposed project will have a significant traffic impact at the intersection of Sepulveda Boulevard and Magnolia Boulevard, as shown in the summary of volume-to-capacity (V/C) ratios and levels of service (LOS) at the study intersections (see Attachment A).

LETTER 8

Emily Gabel-Luddy

- 2 -

November 3, 2003

The project can mitigate its project traffic-related impact to a less-than-significant level by funding a proportionate share of the cost for the design and construction of the Victory/Ventura Corridor ATCS Upgrade. DOT recommends that the following Project Requirements be adopted as conditions of project approval.

PROJECT REQUIREMENTS

A. Adaptive Traffic Control Systems (ATCS) Upgrade

The intersection of Sepulveda Boulevard and Magnolia Boulevard will be mitigated to a less-than-significant level by funding a proportionate share of the cost for the design and construction of the Victory/Ventura Corridor ATCS Upgrade. The project's proportionate share of the cost for the Victory/Ventura Corridor ATCS Upgrade is equal to the average ATCS Upgrade cost per intersection, which currently is \$20,000. ATCS improvements shall be guaranteed through a cash payment prior to the issuance of any building permit. Since the cost of ATCS improvements are reviewed and adjusted periodically, the actual cost may change depending on when payment is made. Funding of ATCS improvements must be guaranteed before the completion of the upgrade in order to qualify as a mitigation measure for this project. Currently the date for the completion of the upgrade is April 2004. In the event a different project impacts this intersection and wishes to fund a proportionate share of the cost for the ATCS Upgrade as a mitigation measure, it may be allowed to do so if this applicant has not already guaranteed the improvement, and a different mitigation measure would then have to be identified for the 98-unit apartment building project.

B. Highway Dedication and Improvements

Magnolia Boulevard is a designated Local Street west of Sepulveda Boulevard and a Secondary Highway east of Sepulveda Boulevard in the Streets and Highways Element of the City's General Plan. Magnolia Boulevard currently consists of a 40-foot half right-of-way with a 15-foot half roadway and a 25-foot sidewalk. The standard cross section for a Local Street is a 30-foot half right-of-way with an 18-foot half roadway and a 12-foot sidewalk. The standard cross section for a Secondary Highway is a 45-foot half right-of-way with an 35-foot half roadway and a 10-foot sidewalk. The total right-of-way is 80 feet along the project frontage and there exists a continuous 80-foot right-of-way to the west. Therefore, a 5-foot dedication is required along the entire project frontage to provide for the future extension of Magnolia Boulevard as a Secondary Highway. This may be completed through a dedication, future street dedication, or combination of dedication and future street dedication to the satisfaction of the Department of Public Works, Bureau of Engineering and DOT.

The street dedication shall be completed through Linda Arnold in the Department of Public Works, Bureau of Engineering, Land Development Group, (213) 977-8933, before the issuance of any building permit for this project. Since the dedication procedure may be lengthy, the process should be commenced as soon as possible.

Additional street improvements may be required, the applicant should contact the Bureau of Engineering, Department of Public Works, to determine any other requirements.

LETTER 8

Emily Gabel-Luddy

- 3 -

November 3, 2003

C. Site Access and Internal Circulation

This determination does not include approval of the project's driveways, internal circulation, or parking scheme. A preliminary review of the site plan indicates the following revisions may be necessary to bring the site layout into conformance with DOT standards:

- The project driveway shall be 30 feet in width, w=30', exclusive of the side slopes for two-way operation.
- Parking shall not be allowed between the property line and the entrance to the parking area.

Final DOT approval shall be obtained prior to issuance of any building permits. This should be accomplished by submitting detailed site and driveway plans, with a minimum scale of 1"=40', to DOT's Valley Development Review Section at 6262 Van Nuys Boulevard Suite 320, Van Nuys, CA 91401.

If you have any further questions, you may contact Kevin Ecker of my staff at (818) 374-4699.

Attachment
SV:kc
SFV 03-027

- c:
- Second Council District
 - Mike Bagheri, DOT Metro Programs
 - Irwin Chodash, DOT East Valley District
 - Jim Williams, DOT ATSAC
 - John Afford, DOT Accounting
 - Randall Tsurutani, BOE Valley District
 - Linda Arnold, BOE Land Development
 - Antonio Coco, Coco Traffic Planners
 - Carlos Madrigal, Catalina Systems

LETTER 8

ATTACHMENT A

98-unit Apartments
 15357 Magnolia Boulevard
 DOT Case No: SFV 03-027

Summary of Volume to Capacity Ratios (V/C) and Levels of Service (LOS)
 November 3, 2003

Intersection	Peak Hour	Year 2002 Existing		Year 2005 w/o Project		Year 2005 w/ Project		Project Impact	Year 2005 w/ Mitigation		Project Impact
		V/C	LOS	V/C	LOS	V/C	LOS	Δ V/C	V/C	LOS	Δ V/C
Burbank Blvd. & Sepulveda Blvd.	AM	0.848	D	0.857	D	0.861	D	0.004			
	PM	0.826	D	0.833	D	0.838	D	0.005			
Magnolia Blvd. & Sepulveda Blvd.	AM	0.980	E	1.048	F	1.078	F	0.030*	1.048	F	0.000
	PM	1.122	F	1.197	F	1.214	F	0.017*	1.184	F	-0.013
101 Fwy NB Ramp & Sepulveda Blvd.	AM	0.781	C	0.785	C	0.792	C	0.007			
	PM	0.492	A	0.485	A	0.498	A	0.013			
101 Fwy SB Ramp & Sepulveda Blvd.	AM	0.771	C	0.802	D	0.808	D	0.006			
	PM	0.493	A	0.513	A	0.519	A	0.006			
Ventura Blvd. & Sepulveda Blvd.	AM	0.928	E	0.938	E	0.940	E	0.002			
	PM	0.918	E	0.928	E	0.936	E	0.008			

* Project-Related Significant Impact

LETTER 9

From: "Kristen Wageman" <
To: <jliao@planning.lacity.org>
Date: 9/20/2004 7:05:43 PM
Subject: File Number EIR 2003-0742

September 20, 2004

Dear Mr. Liao:

I am a homeowner at the Sherman Oaks Villas 15335 Magnolia Blvd. #109 Sherman Oaks, CA 91403. I have reviewed your letter on the environmental impact report for the property located at 15357 W. Magnolia Blvd.

Frankly I am appalled that a review of this property does not immediately communicate to you that the impact of a 98 unit apartment building with 185 parking spaces is a serious hazard to the residents of our little dead end street.

9-1

I can barely get out of my parking garage now between the traffic for the school at the end of the street and the office building on the corner.

9-2

As a homeowner and tax payer I find this ruling totally unacceptable! One of the reasons I purchased my unit is that we are on a dead end street and that it is quiet in the evenings and on the weekends. Also my unit is right next door to this property so it will affect me more than perhaps other homeowners in the building. Besides the amount of traffic and noise there will also be more trash and the strong possibility that this apartment building will negatively affect the resale value of my unit.

9-3

As I drive thru Sherman Oaks I see For Rent signs everywhere so the only conclusion I can come to is that the city is more interested in potential tax revenue than it is the welfare of the taxpayers and homeowners who live there.

9-4

I hope you will consider the impact of this decision and hold a public hearing.

9-5

Sincerely,

Kristen Wageman

CITYWOOD CONDIMINIUMS
15344 Weddington St. #203
Sherman Oaks, CA 91411

October 8, 2004

RECEIVED
CITY OF LOS ANGELES
OCT 13 2004
ENVIRONMENTAL
UNIT

JIMMY LIAO
CITY OF LOS ANGELES DEPARTMENT OF CITY PLANNING
200 North Spring Street, Room 781
Los Angeles, CA 90012

RE: TOWER OF WOODEN PALLETS APARTMENT PROJECT
15357 Magnolia Blvd
State Clearinghouse Number 2003121098
EIR-2003-0742.

Dear Mr. Liao:

10-1 This letter is in response to the Draft EIR referenced above. We are representatives of the Citywood Condominium Homeowners' Association. Our property is directly north of the site of the proposed project on Magnolia Boulevard in Sherman Oaks. While we are enthusiastic about the property in question being redeveloped, a review of the Draft EIR brings forth several concerns that impact our property specifically and our neighborhood in general.

GEOLOGY AND SOILS - Part IV.E

10-2 The report indicates that studies have been done on the soil of the proposed project, and the study was very specific as to the construction and grading guidelines required. Our purpose is not to question the validity of the results or the methods used in the study, but to convey additional, relevant information.

Our swimming pool is about 5 feet from the north property line of the Magnolia Project. In the past, pool contractors have indicated that there might be stability issues with our pool. No significant movement or damage has occurred as of yet, but the excavation required and the movement of heavy equipment on-site might cause damage to our pool. Since this information was not available to the Soils Engineer, we thought it might be valuable at this time. We would be happy to cooperate in any further testing or other mitigation.

PARKING – POPULATION AND HOUSING PAGE IV.I

10-3 Our preeminent concern is the impact this project will have on street parking on Magnolia and Sepulveda Boulevards. Page IV-I-4 indicates that the project will have 185 parking spaces for the proposed 98 units. The report also states that this exceeds the Los Angeles Municipal Code's requirement. Our belief is that this is why the report does not address the impact of street parking. It is assumed that on-site parking will meet the needs of the project.

However, the methodology used by the report would be appropriate if the project is to be made up of one and two-bedroom apartments. That is not what the report calls for. In fact, the project calls for 31 three-bedroom, 62 units with four-bedrooms or more, and five "affordable disabled" units. The report also calls for 191 adults and 44 school age children (based on Census Data and School Information). We have attached Exhibit A as an analysis of parking needs for the building plan.

Exhibit A indicates 346 total bedrooms in 98 units. Using Census factors in the Study, the project would house 186 adults and 44 school age children. That would require 230 bedrooms (Line 7) to house the population. (This is probably conservative, as both adults and children often share rooms)

10-4 With a demand for 230 rooms and a supply of 346 rooms (Line 3), that would leave 116 rooms available for roommates or adult family members. If we assume that there was a need for .6125 parking spots per available adult bedroom (See line 10), there would be a parking spot deficiency of 70. (Line 11)

These cars would need to park on Magnolia and Sepulveda Boulevards, adding to an already difficult parking situation on the streets. Again, this analysis is probably conservative, given that some older children excluded from the calculation will probably have cars, and visitors of the building will need parking.

We would request that the Final Environmental Impact Report include an analysis of the project's demand for street parking in the area.

CONCLUSION

10-5 At this point, we fully support the development of the property at 15357 Magnolia Boulevard. It has been a neighborhood eyesore and magnet for crime for many years. We also understand that there is a critical housing shortage in the City of Los Angeles, and the City has a general policy of increasing the density of neighborhoods. However, increased traffic and insufficient street parking severely impact the quality of life of neighborhood residents. These factors simply cannot be ignored in making planning decisions.

10-5

We would propose that "Alternative 2 -- Reduced Density Alternative" be accepted. This would still allow for 78 units to be built. While we support the concept of "Affordable Disabled" units, the density bonus granted would negatively impact all areas of life in the neighborhood.

We look forward to addressing these issues at the public hearing.

Thank you for your consideration.

JERRY WINKLHOFER
BOARD MEMBER, CITYWOOD CONDOMINIUM HOMEOWNERS' ASSOCIATION

AMY CAREY
BOARD MEMBER, CITYWOOD CONDOMINIUM HOMEOWNERS' ASSOCIATION

cc: Citywood Condominium Homeowners' Association Board Members
Tandem Management
Westgate Group, Inc.
Candy Campbell, Councilwoman Wendy Gruel's Office

Enclosure

TOWER OF WOODEN PALLETS APARTMENT PROJECT
15357 MAGNOLIA BLVD

EXHIBIT A

LINE		DISABLED AFFORDABLE	3 BDR	4+ BDR	TOTAL
1	BEDROOMS	1	3	4	
2	UNITS	5	31	62	98
3	TOTAL BEDROOMS (LINE 1 X 2)	5	93	248	346
4	GEN FACTOR (U.S. CENSUS)	1	1.85	1.95	
5	TOTAL ADULTS PROJECTED (LINE 2 X 4)	5	60.45	120.90	186.35
6	CHILDREN (PER D.E.I.R)	0	14.52	29.48	44
7	TOTAL RESIDENTS (LINE 5 + 6)	5	74.97	150.38	230.36
8	TOTAL AVAILABLE ADULT BEDROOMS (LINE 3 - 6)	6	78.48	218.52	302
9	ADULT BEDROOMS IN EXCESS OF ADULT RESIDENTS PROJECTED (LINE 8 - LINE 5)	0	18.03	97.62	115.65
10	PARKING SPOTS PER ADULT BEDROOM RATIO (165 PARKING SPOTS/302 BEDROOMS)	0.6125	0.6125	0.6125	
11	TOTAL PARKING SPOT DEFICIENCY (LINE 9 X LINE 10)	0	11.04	59.78	70.84

LETTER 11

ROSENHEIM & ASSOCIATES

21800 Oxnard Street • Suite 480 • Woodland Hills, CA 91367 • (818) 716-2689 • FAX (818) 593-6184

October 14, 2004

Mr. Jimmy Liao
Los Angeles City Planning Department
Environmental Review Section
200 N. Spring Street, Room 761
Los Angeles, CA 90012

Re. Tower of Wooden Pallets Apartment Project
State Clearinghouse Number: 2003121098
EIR-2003-0742 / Site Address: 15357 Magnolia Blvd.

Dear Mr. *Jimmy*

I have been retained by the Emek Hebrew Academy (EMEK) and the Sherman Oaks Villas Homeowners Association (SOVHA) (both immediate neighbors of the proposed project), to review and provide comment on the above-mentioned Environmental Impact Report. Following are my comments related to this document:

Section I. SUMMARY

Page I-4 B. Proposed Project

Comment: The proposed parking garage is interchangeably referred to as at-grade and semi or partial subterranean throughout the document leaving the reader and appropriate agencies unclear as to the manner in which the proposed parking will be constructed. The differences between at-grade parking versus partial subterranean will impact the nature and amount of excavation required, possibly the nature and therefore duration of construction, construction noise and air quality, potential hydrology including impact of ground water levels and construction related traffic impacts.

Request: The proposed garage must be defined and be made consistent throughout the document and all related impacts such as but not limited to those identified above, must be appropriately modified and addressed. Furthermore, to mitigate the construction related impacts related to noise, air quality, vibration and traffic, excavation should be performed only during the summer when the EMEK Hebrew Academy is not in session and residents of the abutting properties might most likely be away on vacation.

11-1

LETTER 11

Section II. ENVIRONMENTAL SETTING

Page II-1 Local Setting

11-2

Comment: Magnolia Boulevard is identified as a major arterial in the DEIR when in fact, according to the Los Angeles City Transportation Element and the Generalized Circulation Plan, it is a Local Street.

Request: The street designation should be corrected and any appropriate modification to the transportation analysis should be made to reflect the correct street designation adjacent to the subject property.

Section III. PROJECT DESCRIPTION

Page III-1 A. Project Location

11-3

Comment: The Emek Hebrew Academy (EMEK) (later referenced in the DEIR under several names including the institution, the school and The Teichman Family Torah Center) has a K-8 school with an enrollment of 600 students. EMEK is located immediately to the west of the subject property but is not included as an abutting use in this Section. The school with its children ranging in ages from 5 - 14 is a very sensitive receptor but is often ignored in the DEIR as an abutting use. In fact EMEK, when it is referenced in the DEIR, is described as being 100 feet from the subject property. In reality, the EMEK school building is located less than 10 feet from the common property line with the proposed project.

Request: The DEIR and its technical elements, in particular but not limited to; construction related noise, vibration, air quality, soil contamination and traffic as well as shade and shadow, privacy and other operational and permanent elements must be restudied to accurately reflect the proposed project's impacts on EMEK, which is indeed a very sensitive receptor.

C. Project Characteristics

11-4

Comment: The proposed project as designed, with balconies and large windows along the east and west elevations of the building, will significantly impact the privacy and security of the Emek Hebrew Academy and the privacy of the SOVHA. This element is disregarded in the DEIR but has biblical implications to EMEK as well as practical privacy and security implications to EMEK and SOVHA.

Request: The FEIR must address this matter and provide for adequate mitigation measures such as the elimination of balconies on the east and west building elevations and the elimination of windows and/or provision for only high level windows on both the east and west elevations.

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Page 3

Section IV. ENVIRONMENTAL IMPACT ANALYSIS
A. IMPACTS FOUND TO BE LESS THAN SIGNIFICANT

Page IV. A-2 3. Land Use and Planning

Comment: New residential projects within the City of Los Angeles consisting over of over 50 residential units must apply for Site Plan Review (SPR). According to Section 16.05 of the City of Los Angeles Municipal Code;

The purposes of site plan review are to promote orderly development, evaluate and mitigate significant environmental impacts, and promote public safety and general welfare by ensuring that development projects are properly related to their sites, surrounding properties, traffic circulation, sewers, other infrastructure and environmental setting; and to control and mitigate the development of projects which are likely to have a significant adverse effect on the environment as identified in the City's environmental review process, or on surrounding properties by reason of inadequate site planning or improvements.

As indicated above and throughout this comment letter, the land use and planning implications of the proposed project are significant, particularly as they relate to the adjacent uses, both deemed as sensitive receptors. The SPR process as stated above, was initiated to ensure that development projects properly relate to surrounding properties and that projects mitigate the adverse effect on surrounding properties that might result due to inadequate site planning.

It is our contention that the proposed project as currently designed will have a significant and ongoing impact on the surrounding properties as it relates directly to land use and planning. This is due primarily but not solely to, poor site planning, over intensification of development and lack of design consideration related to items such as, but not limited to, windows and balconies as they relate to the abutting sensitive receptors.

Request: Land Use and Planning must be evaluated in the FEIR as having significant impacts and appropriate mitigation measures must be identified to reduce and/or eliminate said impacts on the adjacent properties.

Section IV.B. VISUAL RESOURCES

Page IV.B-5&7 *Comment:* Once again, EMEK is not included as a neighborhood use. As indicated this is a consistent oversight throughout the document. Additionally, when EMEK is identified as a neighboring use it is portrayed as being 100 feet from the subject site when in fact it is 10 feet from the property line.

11-5

11-6

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11-6

Request: As previously stated, the EIR must include EMEK as a neighboring use and must also analyze all impacts as they relate to an immediately adjacent school use.

Section IV.C AIR QUALITY

Page IV.C-9 *Comment:* Reference is made on this page to "no extensive grading activities are warranted" while a previous section of the DEIR states that "No excavation of earth materials are planned for this project." (Page I-12 of the DEIR). The issue of excavation is left unclear throughout the document yet is essential to an appropriate analysis of the air quality impacts during the construction phase of the proposed project. The issue of excavation and therefore air quality impacts relates specifically to the matter of whether the garage is to be at grade or partially subterranean. This is another matter that must be clarified and made consistent throughout the FEIR.

The fact that the DEIR contradicts itself so frequently as it relates to the issue of excavation and the status of the parking garage (at grade versus partially subterranean) causes concern as to the level of analysis performed on the construction air quality, noise, vibration and other related impacts on the adjacent residential and school uses. This concern is further exacerbated by the DEIRs consistent misrepresentation of EMEK's proximity to the project site (in those few instances when the school's presence is even acknowledged).

11-7

Finally, the DEIR states; "The project is too limited in scope to cause air quality impact significance thresholds to be exceeded during construction. We take exception to this conclusion. It is clear throughout the document that the EMEK school use is disregarded as being too distant from the site or quite possibly not even considered as a sensitive receptor. There is no discussion or analysis of the construction impacts (air quality, noise, vibration and traffic) as they relate to the 600 youngsters that study five days a week from early morning to mid afternoon (the same general hours as construction) immediately adjacent to the subject site.

Request: The impacts of site excavation must be thoroughly analyzed particularly as they relate to the school and residential uses directly abutting the proposed construction site. We believe construction will have significant and unmitigateable impacts on these uses, particularly EMEK and as such, additional efforts must be made to mitigate said impacts. Appropriate mitigation measures beyond those identified in the EIR must be considered including but not limited to, the washing down of adjacent properties (i.e. windows and patios) and other protections to air filtration systems such as filter and or unit replacement. The status of the garage must be determined and made consistent throughout the EIR so as to assure an understanding of the amount of earth movement necessary to complete the proposed project.

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Section IV.D. CULTURAL RESOURCES

Comment: The subject property houses one of the San Fernando Valley's ±40 designated historic monuments. This in comparison to a citywide total of approximately 700 historic monuments highlights the importance of this one monument to the local community. Yet, the DEIR discounts the monument to a relic worthy of only some plans and photos to be archived in the downtown Central Library.

There is no consideration or discussion in the DEIR given to reducing the project's scope in a manner that would permit housing and the monument to co-exist on the property. Nor is there discussion of a project alternative that would allow the monument to be retained while permitting another use to be conducted on the site.

11-8

It seems disingenuous for the DEIR to so matter of factly dismiss the further existence of this monument without consideration of alternatives that would allow for its co-existence with another use. Furthermore, the mitigation measures listed in the DEIR are minimal at best and show a lack of consideration and thought as to how best memorialize the Tower of Wooden Pallets both on and off site.

Request: Additional consideration should be given to alternative means of maintaining the Tower of Wooden Pallets. This can be accomplished by downscaling the proposed project or identifying an alternative use that can be performed on the site while maintaining the Tower. Furthermore, the measures that can be employed to mitigate the actual demolition of the Tower can and should be significantly enhanced.

Section IV.F. HAZARDS AND HAZARDOUS MATERIALS

Page IV.F-1 Hazardous Materials/Petroleum Products Storage and Handling

11-9

Comment: This section refers to possible canister degradation, leaks and/or spills as well as potential fluid leaks from several abandoned vehicles that may pose a hazard to people working on the project site. Yet there is no clear plan articulated in the DEIR to determine if indeed dangerous spills have occurred and if so, what steps are to be taken to assure the community is not put at risk by the required cleanup.

Page IV.F-2 Mold

11-10

Comment: Mold may be present on the site - specifically identified as a potential toxin within the Tower of Wooden Pallets. Amazingly, the DEIR only discussed the potential impact of the mold on construction workers, completely disregarding the residents and school children immediately adjacent to the project site. If indeed the Tower of Wooden Pallets is to be demolished, appropriate measures

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Page 6

11-10

must be identified to safeguard the residents and students in the vicinity of the site.

It is recommended that a survey be conducted to determine the presence of mold in the Tower of Wooden Pallets. There is little discussion however, on the follow-up to the study and the means by which the community will be assured that appropriate mitigation is followed.

The applicant already has a history on this site of demolition prior to receiving building permits let alone the performance of appropriate testing for asbestos, molds and the like. Additional scrutiny is necessary to protect the residents and students in the immediate area.

Request: The FEIR must outline a strict course of action related to mold and other potential toxins. In fact, the FEIR should incorporate the results of a mold survey and if applicable, its recommended mitigation measures. This would document the required measures and allow them to be made a part of a project approval as well as the mitigation monitoring.

All potential Hazards should be studied in relation not just to the workers on the site, but all residents and students in the immediate area.

Section IV.F. HYDROLOGY AND WATER QUALITY

11-11

Comment: The site is currently vacant with the vast majority of the lot in a natural state and therefore, a significant percentage of permeable surface area. The proposed project will eliminate all but a very small percentage of permeable area thereby increasing water flow to Magnolia Boulevard **significantly**. As stated in the DEIR, (page IV.G-5, footnote 1) "... calculations show that existing and proposed 10-year frequency storm runoff overflows the top of the curb elevations on Magnolia Boulevard."

Magnolia Boulevard serves as the sole access to the SOVHA as well as EMEK. Any additional water directed to the street should not be permitted in any way to exacerbate the existing problem.

Request: The project must be required at a minimum to mitigate its contribution to the Magnolia Boulevard flooding problem.

Section IV.H. NOISE

11-12

Comment: Unlike the other sensitive receptors in the area, EMEK is operated at its peak from early morning to mid-afternoon -- the same general hours as the construction crews. The DEIR noise analysis does not appear to consider or address this factor. In the instance when the school is considered in the DEIR it is incorrectly identified as being approximately 100 feet west of the proposed project site. As previously stated, EMEK is 10 feet from the project site and

LETTER 11

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Page 7

therefore subject to potentially very significant noise impacts, particularly during the construction phase.

The DEIR further states "... that the nearest sensitive receptors, which would experience the highest noise levels, are approximately 30 feet to the east of the site." This clearly indicates the analysis is flawed to the core. It must be redone with specific attention focused on the school use located 10 feet from the subject property.

11-12

The DEIR does not address the noise impacts of the project's operational elements such as but not limited to; air conditioning, pool heating and filtration equipment and trash hauling.

Request: The noise impact analysis should assess the impact of the construction and operation of the proposed project on the Emek Hebrew Academy, as it actually exists in proximity to the subject property (10 feet from the property line). Additional mitigation measures should also be considered such as requiring the grading and excavation work (which has the potential to create the greatest noise and air quality impact) to take place during EMEK's summer break period.

Section IV. I. POPULATION AND HOUSING

11-13

Comment: Based on the DEIR, the proposed project is composed of 31 three bedroom units, 62 four bedroom units and five smaller units reserved for "Affordable Disabled" (DEIR, Section I, Page I-4). On the basis of this unit mix, the minimum parking requirement is 188.5 parking spaces. Therefore, the site is under parked at the minimum city standards. In reality, the project must also accommodate parking for guests at the minimum ratio of .25 parking spaces per unit. Based on this city standard an additional 24.5 spaces must be provided thereby bringing the total parking required for the proposed project to 213 parking spaces.

The area in question has a moderately high demand for on-street parking; therefore, requiring guest parking at the standard city rate is reasonable and consistent with city policy.

11-14

Comment: The DEIR anticipates a total of 191 people living in the proposed project. Common sense dictates otherwise. If one were to take an average of one person per bedroom across all of the units (one resident per Affordable Disabled Unit) the resident population would be 344. This estimate seems to be much more accurate as some units will have people doubled up in rooms while others will have rooms for offices or other purposes.

Request: The significant underestimation of the resident population may have led to other miscalculations throughout the DEIR. Therefore, the applicable sections of the DEIR must be reviewed and revised according to more accurate numbers presented in this letter.

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Page 8

Section IV.J PUBLIC SERVICES

Comment: On October 13, 2004, the author of this letter spoke with Office Marco Jimenez of the Los Angeles Police Department's Community Relations Section, Site Plan Review Office. He expressed concern with the general conclusion that the redevelopment of the site could lead to a reduction in crime in the localized area. According to Officer Jimenez, without a review of current complaints and crime statistics resulting from the site specifically, this comment is pure speculation and invalid.

11-15

Office Jimenez also expressed concern as to the privacy and safety of the students in regard to the proximity of a grade school 16 feet (EMEK is 10 feet from the property line while it is our understanding the proposed project is designed to be six feet from the property line) from a three story multiple residential apartment building designed with windows and balconies that enable one to easily look directly into the school (and visa versa). No further comment need be made as to the dangers associated with this scenario.

An interesting observation, it is a bit surprising that the quote from Sergeant Amendola (DEIR, Page IV.J-5) was made on March 11, 2003. It was our understanding the work on this EIR commenced after that date.

Request: The project be redesigned to eliminate balconies on the west and east side and provide high-level windows only on the west side of the project.

Page IV.J.-13 Schools

11-16

Comment: Based on the project population provided above, the student projections seem to be significantly underestimated.

Request: The numbers of potential students must be recalculated and a new school related impact analysis conducted.

Section IV.K TRANSPORTATION AND TRAFFIC

11-17

Comment: The DEIR does not provide an assessment of construction related traffic impacts. The subject property is located directly to the east of Emek Hebrew Academy with all traffic to and from EMEK flowing past the subject site. There is no acknowledgement of the potential for danger and congestion that may result from the hundreds of cars accessing EMEK while large trucks are maneuvering into and out of the proposed development site.

Request: THE FEIR must include a detailed description of the mitigation measures that will be employed to mitigate the construction related traffic impacts on the residences and most importantly the Emek Hebrew Academy.

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Page 9

Section VI. ALTERNATIVES TO THE PROPOSED PROJECT

11-18

Comment: The DEIR must also evaluate a project alternative that would provide for the development of a less intense residential project while maintaining the Tower of Wooden Pallets.

Request: This alternative be fully analyzed and provide for in the FEIR.

Page VI-2

C. Alternative Rejected as Infeasible

11-19

Comment: The last few sentences of this Section may very well have been written about the Watts Tower. It too was deteriorating, built to no code other than that of its visionary builder with no specific idea of longevity or structural integrity. But the Watts Tower endures as one of Los Angeles' great personal achievements. Millions of dollars have been spent to assure its future.

Similar treatment could afford the Tower of Wooden Pallets a similar future. Either a stand-alone monument or incorporated into another use, the Tower of Wooden Pallets could be saved if the effort were made.

Request: MAKE THE EFFORT!

In closing, I notice that the DEIR does not address the areas of "Known Controversy". Presumably, this letter will assist in addressing this required element of the EIR.

11-20

Mr. Liao, on behalf of my clients, Emek Hebrew Academy and the Sherman Oaks Villas Homeowners Association, the two neighbors most directly affected by the proposed development of 98 residential units, I thank you for considering these comments and seeing that they are appropriately addressed in the Final Environmental Impact Report.

Please feel free to contact me if you should have any questions or comments regarding this letter.

Sincerely,



Brad M. Rosenheim
ROSENHEIM & ASSOCIATES