II. COMMENTS AND RESPONSES

A. OVERVIEW

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

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

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

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

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

In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as
the magnitude of the project at issue, the severity of its likely environmental impacts, and
the geographic scope of the project. CEQA does not require a lead agency to conduct
every test or perform all research, study, and experimentation recommended or
demanded by commenters. When responding to comments, lead agencies need only
respond to significant environmental issues and do not need to provide all information
requested by reviewers, as long as a good faith effort at full disclosure is made in the
EIR.

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

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

B. LIST OF THOSE WHO COMMENTED ON THE DRAFT EIR

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

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

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

<table>
<thead>
<tr>
<th>Commenters</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. State Clearinghouse and Planning Unit</td>
<td>September 29, 2009</td>
</tr>
<tr>
<td>No.</td>
<td>Name</td>
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<tr>
<td>2</td>
<td>Wastewater Engineering Services Division, Bureau of Sanitation</td>
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<tr>
<td>3</td>
<td>Beverly Hills Department of Community Development</td>
</tr>
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<td>4</td>
<td>Metropolitan Transportation Authority</td>
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<tr>
<td>5</td>
<td>Barbara Rowe</td>
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<td>6</td>
<td>Joseph Blum</td>
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<td>7</td>
<td>Carolyn Brown</td>
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<td>8</td>
<td>Christine Scotti</td>
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<td>9</td>
<td>Jeffrey Vinnick</td>
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<td>10</td>
<td>Cathie Kamin</td>
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<td>11</td>
<td>Lenore Sachs</td>
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<td>12</td>
<td>Douglas Jefferson</td>
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<td>13</td>
<td>Mark Wakim</td>
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<td>14</td>
<td>Victoria Arch</td>
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<td>15</td>
<td>Elizabeth Roach</td>
</tr>
<tr>
<td>16</td>
<td>Teresa Feldman</td>
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<td>17</td>
<td>Amy Galaudet and Tom Challener</td>
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<td>18</td>
<td>Mark Wakim</td>
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<td>Christine Scotti</td>
</tr>
<tr>
<td>20</td>
<td>Denise Lampron</td>
</tr>
<tr>
<td>21</td>
<td>A1 – 21 A34. Form Letters</td>
</tr>
</tbody>
</table>
Comment Letter No. 1

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

September 29, 2009

RECEIVED
CITY OF LOS ANGELES
OCT 06 2009
ENVIRONMENTAL UNIT

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

Subject: Wilshire Crescent Heights
SCH#: 2008051017

Dear Jimmy Liao:

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

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

Sincerely,

Scott Morgan
Acting Director, State Clearinghouse

1400 10th Street  P.O. Box 3044  Sacramento, California  95812-3044
(916) 445-0613  FAX (916) 323-3013  www.opr.ca.gov
LETTER NO. 1

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

Comment No. 1-1

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

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

Response to Comment No. 1-1

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.
DATE: September 3, 2009

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

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

SUBJECT: Wilshire Crescent Heights – Draft EIR

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

WASTEWATER REQUIREMENT

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

Projected Wastewater Discharges for the Proposed Project:

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<tr>
<th>Type Description</th>
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SEWER AVAILABILITY

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

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

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* No gauging available

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

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

STORMWATER REQUIREMENTS

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

SUSMP AND STORM WATER INFILTRATION

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

GREEN STREETS

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

WET WEATHER EROSION CONTROL

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

STORM WATER POLLUTION PREVENTION PLAN

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

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

SOLID RESOURCE REQUIREMENTS

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

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

c: Meher Irani, BOS
    Daniel Hackney, BOS
    Rowena Lau, BOS
LETTER NO. 2

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

Comment No. 2-1

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

Response to Comment No. 2-1

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

Comment No. 2-2

WASTEWATER REQUIREMENT

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

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</table>
**Response to Comment No. 2-2**

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

**Comment No. 2-3**

SEWER AVAILABILITY

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

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

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

The information provided in the Draft EIR regarding sewer availability was provided by the City of Los Angeles Bureau of Sanitation via written correspondence dated February 21, 2008. If the detailed gauging shows that there is insufficient capacity in the Orange Street line, the project shall be responsible for upgrading this line to accommodate the additional flows. It is acknowledged that this comment states...
slightly different information than what is presented in Section IV.M.1, Utilities/Service Systems, Wastewater, of the Draft EIR (for example the design capacities of the pipes are greater than shown in the Draft EIR), but does not change the conclusions of the Draft EIR. Please see Section III, Additions and Corrections, of this Final EIR for the revised information.

Comment No. 2-4

STORMWATER REQUIREMENTS

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

SUSMP AND STORM WATER INFILTRATION

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

Response to Comment No. 2-4

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

Comment No. 2-5

GREEN STREETS

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

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

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

**Comment No. 2-6**

**WET WEATHER EROSION CONTROL**

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

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

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

**Comment No. 2-7**

**STORM WATER POLLUTION PREVENTION PLAN**

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

WPD staff is available at your request to provide guidance on stormwater issues. Should you have any questions, please contact Meher Irani of my staff at (213) 485-0584.
Response to Comment No. 2-7

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

Comment No. 2-8

SOLID RESOURCE REQUIREMENTS

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

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

Response to Comment No. 2-8

The proposed project shall be consistent with all applicable requirements and regulations, including compliance with the City’s solid resource requirements. This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.
September 18, 2009

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

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

Dear Mr. Liao:

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

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

Our Traffic Engineer has also asked for greater explanation and justification of the use of high pass-by trip reductions and confirmation that these reductions are approved by the City of Los Angeles.
Jimmy Liao, City Planner
Wilshire Crescent Heights Project DEIR/ENV-2008-0729-EIR
September 18, 2009
Page 2 of 3

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

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

Sincerely,

LARRY SAKURAI
Principal Planner

cc: Aaron Kunz, Deputy Director of Transportation
Jonathan Lait, AICP, City Planner
Susan Healy Keene, AICP, Director of Community Development
Mahdi Aluzri, AICP, Assistant City Manager
**Future with Project PM Alt**

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<tr>
<th>Street Name:</th>
<th>La Cienega Bl</th>
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**Level Of Service Computation Report**

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**Traffic Flow Module:**

| Sat/Lane:  | 1600 1600 | 1600 1600 | 1600 1600 | 1600 1600 | 1600 1600 | 1600 1600 | 1600 1600 | 1600 1600 | 1600 1600 |
| Adjustment: | 1.00 1.00 | 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 |
| Lanes:      | 0.00 0.00 | 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 |
| Final Sat.: | 1600 1600 | 1600 1600 | 1600 1600 | 1600 1600 | 1600 1600 | 1600 1600 | 1600 1600 | 1600 1600 | 1600 1600 |

**Capacity Analysis Module:**

| Vol/Sat: | 0.11 0.34 0.34 0.10 0.35 0.35 0.14 0.49 0.49 0.12 0.35 0.35 |
| Crit Moves: | **** | **** | **** | **** | **** | **** | **** | **** | **** | **** | **** | **** |
LETTER NO. 3

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

Comment No. 3-1

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

Response to Comment No. 3-1

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

Comment No. 3-2

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

Response to Comment No. 3-2

As indicated in the Draft EIR (Figures IV.L-14 and IV.l-15), net project traffic travelling along Wilshire Boulevard into and out of the City of Beverly Hills (west of Wilshire Boulevard and San Vicente Boulevard), are forecast to be approximately 8 westbound and 5 eastbound trips (total of 13 trips) during the AM peak hour, with a reduction of approximately 3 westbound trips (versus existing site-generated traffic) and no net new eastbound trips during the PM peak hour (total reduction of 3 trips). Using the City of Beverly Hills’ requested ICU analysis methodology, which assigns a capacity of 1,600 vehicles per hour per lane, even if all of these net project trips were assigned to a single critical lane at the subject intersection, the potential project impacts would be +0.008 (13 vehicles/1,600 vehicle per lane capacity) during the AM peak hour, and -0.002 (reduction of 3 vehicles/1,600 vehicles per lane) during the PM peak hour. Further, assuming the future LOS F intersection conditions noted by the commenter during
both the AM and PM peak hours, the maximum project impacts would be less than significant under either the City of Los Angeles impact criteria (increase of 0.010 or more at LOS F) or City of Beverly Hills impact criteria (increase of 0.020 or more at LOS F). Therefore, as described in the project Draft EIR, the project would not result in significant impacts at the intersection of Wilshire Boulevard/La Cienega Boulevard during either the AM or PM peak hours, regardless of the analysis methodology, future level of service, or significance thresholds.

**Comment No. 3-3**

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

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

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

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

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

**Comment No. 3-4**

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

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

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to
CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.
September 24, 2009

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

Dear Mr. Liao,

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

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

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

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

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

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

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

Please contact the Westside Subway Extension Project Director David Mieger for further
coordination regarding this project. Mr. Mieger can be reached at 213-922-3040 or
miegerd@metro.net. Information about the Westside Subway Extension can be found on the

In addition, the following issue should be addressed:

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

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

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

Sincerely,

Susan Chapman
Program Manager, Long Range Planning

cc: Renee Berlin
Martha Butler
Jody Feerst Litvak
Rex Gephart
David Mieger
LETTER NO. 4

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

Comment No. 4-1

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

Response to Comment No. 4-1

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

Comment No. 4-2

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

Response to Comment No. 4-2

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

Comment No. 4-3

1. Current bus service: Wilshire Boulevard currently has very high levels of bus transit service and ridership with various bus lines that travel by and stop at or near the proposed project site. Please be advised that Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines. Metro should also be contacted if any changes to existing stops and zones are anticipated either during or after construction. Other Municipal Bus Service Operators may also be impacted and therefore should be included in the FEIR and included in construction outreach efforts.
Response to Comment No. 4-3

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

Comment No. 4-4

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

Response to Comment No. 4-4

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

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

Response to Comment No. 4-5

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

Comment No. 4-6

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

Response to Comment No. 4-6

The project traffic study assumed a reasonable 5% transit utilization for the residential components of the proposed project, based on the current availability of transit in the area. Although as noted in Comment 3-4 and Comment 3-5 additional transit services are proposed for the project vicinity, neither the Wilshire Bus Lane project nor the Westside Subway Extension project are currently approved, and as such, must
be considered speculative with regard to additional project resident and/or visitor utilizations. As such, since the infrastructure to support any substantial increase in project transit use cannot reasonably be assured within the study timeline, no reliance on such transit utilization as a means of reducing potential project traffic impacts was included in the project traffic study and Draft EIR, and therefore, these analyses identify the potential “worst case” traffic impacts for the project. The applicant is amenable to working with Metro and the City Planning Department in order to promote increased transit use.

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

**Comment No. 4-7**

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

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

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

See Response 4-6.

**Comment No. 4-8**

In addition, the following issue should be addressed:

5. Metro did not receive the Notice of Availability of a Draft Environmental Impact Report for the proposed project. Please ensure that Metro is included in future project outreach efforts.
Metro looks forward to reviewing the Final EIR. If you have any general questions regarding this response, please call me at 213-922-6908 or by email atchapmans@metro.net. Please send the Final EIR to the following address:

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

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

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

1. Publication at least one time by the public agency in a newspaper of general circulation in the area affected by the proposed project. If more than one area is affected, the notice shall be published in the newspaper of largest circulation from among the newspapers of general circulation in those areas.

2. Posting of notice by the public agency on and off the site in the area where the project is to be located.

3. Direct mailing to the owners and occupants of property contiguous to the parcel or parcels on which the property is located. Owners of such property shall be identified as shown on the latest equalized assessment roll.

The Notice of availability of the Draft EIR was provided in accordance with both (1) and (3) above. The Notice of Availability of the Draft EIR was published in the LA Times on August 13, 2009. The Notice of Availability was also mailed to the owners and occupants of property within a 500-foot radius of the project site. In addition, the Notice of Availability was also mailed to all persons who provided comments on the Notice of Preparation as well as to applicable public agencies as determined by the City of Los Angeles. A Notice of Availability and a CD of the Draft EIR were sent to Metro and were received and signed for on August 13, 2009. The mailing list used to provide notice and delivery confirmations are on file at the City of Los Angeles, Department of Planning. A copy of the Final EIR will be provided to Metro.
From: Jimmy Liao <Jimmy.Liao@lacity.org>
Subject: Re: ENV-2008-0729-EIR (Wilshire Crescent Heights))
To: "BARBARA ROWE" <mhirlvr@att.net>
Date: Monday, August 24, 2009, 10:33 AM

Dear Ms. Rowe,

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

Jimmy Liao
City Planning Department

Dear Sir,

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

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

Thank you for your attention

Barbara Rowe
6151 Orange Street
Los Angeles 90048
LETTER NO. 5

Barbara Rowe  
6151 Orange Street  
Los Angeles, CA 90048

Comment No. 5-1

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

Response to Comment No. 5-1

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

Comment No. 5-2

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

Response to Comment No. 5-2

The results of the analyses indicate that the proposed project could potentially result in significant traffic impacts at three of the 11 study intersections during one or both peak hours; at 6th Street and Fairfax Avenue (PM peak hour), at Wilshire Boulevard and Crescent Heights Boulevard/McCarthy Vista (AM peak hour), and at Wilshire Boulevard and Fairfax Avenue (both peak hours). The Draft EIR acknowledges significant and unavoidable impacts from these impacts. This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.
From: Joseph Blum <jblumre@gmail.com>
To: <jimmy.liao@lacity.org>
Date: 8/18/2009 1:17 PM
Subject: Wilshire Crescent Heights

Joseph Blum 1753 Orchid Avenue, Los Angeles, CA 90028

August 18 2009

Jimmy C. Liao, City Planner
Department of City Planning
200 North Spring Street, room 750, City Hall
Los Angeles, CA 90012

EIR ENV-2008-0729-EIR
Project Name Wilshire Crescent Heights

Dear Mr. Liao;

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

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

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

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

The neighborhood density has increased dramatically in the last few years with the construction and consequent success of the GROVE. That success has brought in dozens of large residential developments. Non of those have been this tall or concentrated and that has worked in keeping the nature of this area reasonable and livable.

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

Sincerely

Joseph Blum
LETTER NO. 6

Joseph Blum
1753 Orchid Avenue
Los Angeles, CA  90028
jblumre@gmail.com

Comment No. 6-1

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

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

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

Response to Comment No. 6-1

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

The Draft EIR addressed potential density impacts in Section IV.H, Land Use. As discussed in the Draft EIR, page IV.H-21, the proposed project is a mixed use development on a site zoned C4 and R3 and designated as a Regional Center. In accordance with Section 12.22.A18.a of the City of Los Angeles Planning and Zoning Code, because the project site is located within the “Regional Center Commercial”
land use designation, the proposed project’s residential density on the southern portion of the site is governed by the R5 zone standards. Per Section 12.12 C 4 (c), the R5 zone requires a minimum of 200 square feet of lot area per dwelling unit. A maximum total of 194 residential units could be constructed on the C4 portion of the site and a maximum of five units could be constructed on the R3 portion of the site. The proposed project would provide a total of 158 residential (condominium) units and four stand alone townhouse units. Therefore, the proposed project is consistent with residential zoning density requirements and impacts would be less than significant.

Comment No. 6-2

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

Response to Comment No. 6-2

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

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

Comment No. 6-3

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

Response to Comment No. 6-3

With respect to impacts related to neighborhood character and density, please see Response to Comment 5-1. In addition, as discussed in the Draft EIR, page IV.B-8, to reduce the effects of massing of the
proposed structure, the residential portion of the project (levels 5-21) would be provided in a 17-story residential tower (including a roof top garden and lounge level) set above the four-story podium parking. The tower element would be located along Wilshire and approximately 35 feet from the residences to the north. The building will be highly modulated with breaks and shifts in the massing and the visual impact of all exterior louvers, vent grills and other non-ornamental features will be limited.

**Comment No. 6-4**

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

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

The Draft EIR discussed project alternatives, including Alternative 2: Reduced Height and Density Alternative, in Section VI, Alternatives. As discussed in the Draft EIR, page VI-8, the Reduced Height and Density Alternative would provide approximately 100 residential units (not including the four townhouses), and approximately 5,130 square feet of ground floor retail space. Implementation of Alternative 2 would result in some of the same environmental impacts associated with the proposed project. Additionally, this alternative would not satisfy many of the project objectives as fully as the proposed project, including creating more housing and employment opportunities. Although Alternative 2 is considered to be the environmentally superior alternative since it would have a lesser impacts in general due to its reduced size, the Reduced Height and Density Alternative would still result in the same significant and unavoidable shade/shadow impacts and some of the same traffic impacts as the proposed project. This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.
6227 Warner Drive  
Los Angeles, CA 90048  
August 17, 2009  

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

Dear Mr. Liao,

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

Please add my voice to those who oppose this plan.

Sincerely,

Carolyn Brown
LETTER NO. 7

Carolyn Brown
6227 Warner Drive
Los Angeles, CA  90048

Comment No. 7-1

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

Response to Comment No. 7-1

The Draft EIR analyzes impacts to traffic, noise, and aesthetics, proposed mitigation where feasible, and acknowledges significant and unavoidable impacts with respect to traffic at three area intersections, temporary construction noise, and winter shade and shadows. The comment does not identify a specific flaw of the Draft EIR and expresses opinions about the project. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.
From: Christine Scotti <christine@scottidesigngroup.com>
To: <jimmy.liao@lacity.org>
Date: 8/25/2009 5:19 PM
Subject: ENV-2008-0729-EIR (Wilshire Crescent Heights) Proposed Development

Dear Mr. Liao,

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

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

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

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

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

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

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

I thank you in advance for your attention.

Best,
Christine Scotti
6151 Orange Street, #316
Los Angeles, CA 90048
LETTER NO. 8

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

Comment No. 8-1

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

Response to Comment No. 8-1

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

Comment No. 8-2

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

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

Response to Comment No. 8-2

The Draft EIR discussed noise and vibration impacts in Section IV.I, Noise. As discussed in the Draft EIR, page IV.I-7, ambient daytime noise levels listed in Table IV.I-4 are characteristic of a typical urban environment. The greatest regular source of groundborne vibration at the project site and immediate vicinity is from roadway truck and bus traffic. Regarding traffic conditions on residential streets in the project vicinity, an additional analysis was conducted on Orange Street to determine the potential for project impacts on the segments of La Jolla Avenue between 6th Street and Wilshire Boulevard, and
along Orange Street adjacent to the project site, and to the west of Crescent Heights Boulevard. Results of this analysis are shown in Table IV.L-8 of the Draft EIR. The analysis showed that there would be no significant impact to Orange Street from the project.

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

**Comment No. 8-3**

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

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

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

**Comment No. 8-4**

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

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

Existing conditions are presented in the Draft EIR and used as the baseline for the analysis. Observations of the study area indicate that existing traffic congestion throughout the area, particularly during peak commute traffic periods on Wilshire Boulevard, 6th Street, Crescent Heights Boulevard, and Fairfax Avenue result in high utilization of many of the local/residential streets in the area by commuters and
local residents seeking to avoid long delays. The anticipated increases in area traffic resulting from both ambient traffic growth and proposed new development are expected to exacerbate this “cut through” traffic, and it is likely that some project visitors, patrons, and/or employees will themselves use some of the area residential streets as alternative travel routes to and from the project site.

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

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

Comment No. 8-5

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

Response to Comment No. 8-5

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

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

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

**Comment No. 8-6**

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

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

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

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

Thank you.

Jeffrey Vinnick

Haight Brown & Bonesteel LLP

JEFFREY A. VINNICK

Attorney

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August 26, 2009

VIA EMAIL AND U.S. MAIL

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

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

Dear Mr. Liao:

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

As stated in your August 13, 2009 letter, the proposed project will result in significant and unavoidable environmental impacts. Notably, traffic at the subject intersection is already severely congested between the hours of 7:00 a.m. and 7:00 p.m., Monday through Saturday. During the week, cars are backed up as far south as Olympic Boulevard. I often see cars travelling north on Crescent Heights block the intersection at Crescent Heights and Olympic Boulevard because of the congestion going north on Crescent Heights. The additional number of vehicles anticipated with the proposed development will adversely affect safety and the quality of life of those residents, such as myself, who drive through the intersection multiple times each day.
As you are undoubtedly aware, another large residential building has been planned for the northwest corner of Wilshire Boulevard and La Jolla. This second proposed new development is only one block west from the development site. That building, in addition to the one planned for the northeast corner of Wilshire Boulevard and Crescent Heights, in my opinion, will make it impossible to take reasonable steps to mitigate the adverse impact of traffic and the strain on already limited resources such as police and fire suppression services.

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

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

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

Very truly yours,

Jeffrey A. Vinnick
Haight Brown & Bonesteel LLP
LETTER NO. 9

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

Comment No. 9-1

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

Response to Comment No. 9-1

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

Comment No. 9-2

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

Response to Comment No. 9-2

The Draft EIR discussed land use compatibility in Section IV.H, Land Use. As discussed in the Draft EIR, page IV.H-25, the proposed project would result in no significant impacts with respect to land use compatibility. The proposed project’s commercial uses would be located along a portion of Wilshire Boulevard that is commercially zoned, designated as Regional Center Commercial under the Community Plan, and is dominated by commercial uses. The proposed building would have varying stepbacks at different levels to reduce the impact of the height of the structure to existing structures on Orange Street. Moreover, the mass of the tower is concentrated toward Wilshire Boulevard and away from Orange Street. Further, it is not uncommon to locate multi-family structures adjacent to commercial uses. Examples of this mix are currently found nearby along Santa Monica Boulevard and on Wilton Place. Therefore, there are no impacts identified with placement of project uses in relation to the existing surrounding uses of the project site.
**Comment No. 9-3**

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

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

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

**Comment No. 9-4**

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

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

Related project no. 38 is located at 6411 Wilshire Boulevard and consists of 130 apartment dwelling units. This related project, along with 52 others, was incorporated into the traffic analysis and is reflected in Table IV.L-6. As discussed in the Draft EIR, page IV.L-53, in order to present the most conservative assessment of the potential effectiveness of the proposed left-turn mitigation measure at 6th Street and Fairfax Avenue, the project’s impacts at this location is considered to remain significant and unavoidable. Similarly, as no feasible mitigation is available for the project’s potential significant impacts at Wilshire Boulevard and Crescent Heights Boulevard/McCarthy Vista, or at Wilshire Boulevard and Fairfax Avenue, the impacts at these two locations would also remain significant and unavoidable. Although the
The project will prepare and implement appropriate trip-reduction strategies and programs to the satisfaction of LADOT, the effects of the TDM program are not considered to fully mitigate any of the three significant impacts identified above. However, it is noted in LADOT’s traffic impact assessment letter, dated May 5, 2009, that the project’s traffic impacts were analyzed without benefit of potential TDM-related trip reductions, and as such, LADOT identifies that the project’s traffic impacts described in the traffic study are over-stated.

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

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

Comment No. 9-5

The neighborhood around the development site is served by limited resources that could have potentially mitigated the adverse impact on traffic resulting from the increase in persons residing in the area. For example, there is no grocery store within walking distance from the intersection of Crescent Heights and Wilshire Boulevard. Residents, such as me, have no choice but to use their vehicles to run errands. Moreover, I have reviewed the DEIR and, based thereon, believe that the proposed height of the building will cause the neighborhood north of the development site to be cast in darkness most of the day adversely affecting the quality of life for those residing on the streets north of the proposed structure.
Response to Comment No. 9-5

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

Comment No. 9-6

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

Response to Comment No. 9-6

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

As set forth in Section IV.D, Cultural Resources, of the Draft EIR, the Carthay Circle neighborhood located 300 feet to the south of the project site is a designated Historic Preservation Overly Zone (HPOZ). The area to the north of Wilshire, including the project site, is not so designated. Therefore, contrary to the comment, the project would not impact a historically significant area. Additionally, the proposed project, at 255 feet at its highest point, would be shorter in height than 6300 Wilshire (located on the
southwest corner of the intersection). The 6300 Wilshire building is 307 feet high or 50 feet higher than the proposed project.

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

**Comment No. 9-7**

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

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

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

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

As discussed in Section IV.K, Public Services, the proposed project could potentially increase city tax revenues, a portion of which could be used to fund new fire facilities or personnel and any new or expanded police station would be funded via existing mechanisms (i.e., sales taxes, government funding) to which the proposed project would contribute.
Comment Letter No. 10

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

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

Dear Mr. Liao,

I am against the building of this project. Even the city's environmental evaluation does not give it adequately high grades to warrant its building at the expense of the residents of the neighborhood. Please know that many of us are watching what is trying to be foisted on us, and we do not appreciate it.

Cathie Kamin
353 N. Kings Rd
Los Angeles, 90048
LETTER NO. 10

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

Comment No. 10-1

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

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

Response to Comment No. 10-1

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.
From: Lenore Sachs <lenoresachs@abcglobal.net>
To: <jimmy.liao@lacity.org>
Date: 9/24/2009 10:54 AM
Subject: Wilshire/Crescent Project

ERI -# ENV 2008 -0729
Dear Mr. Liao,
I am writing to register my opposition to the height of the building being planned for the intersection of Wilshire Blvd. and Crescent Heights Blvd. It will surely be a nightmare for the residential community there who are suffering right now from heavy traffic congestion. What the resulting traffic will look like if the plans for the building are not scaled down is anyone’s guess. I would only venture to say that it would be full-time gridlock. And who would benefit from that? Not the developers and not the public. This is the time for serious negotiation to solve this huge problem before the project gets off the drawing boards and starts to become a reality on the ground. Hoping there is a solution to be found that will satisfy both the developers and the local residential community, I am sincerely yours, Lenore Levine Sachs. -
LETTER NO. 11

Lenore Sachs
lenoresachs@sbcglobal.net

Comment No. 11-1

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

Response to Comment No. 11-1

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

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

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.
From: Douglas Jefferson <dougdnm@yahoo.com>
To: <jimmy.liao@lacity.org>
Date: 9/24/2009 12:56 PM
Subject: wilshire crescent development

EIR#ENV-20080729-EIR

Dear Jimmy,

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

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

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

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

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

Enough already.

Thanks for your help in stopping this project from happening.

Sincerely,
Douglas Neal Jefferson
323-936-2393
LETTER NO. 12

Douglas Jefferson
dougjdnj@yahoo.com

Comment No. 12-1

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

Response to Comment No. 12-1

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

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

Comment No. 12-2

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

What a disaster. No retail has moved in on the ground level and to my knowledge only three units have been sold or rented in the entire building.
Response to Comment No. 12-2

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

Comment No. 12-3

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

Response to Comment No. 12-3

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

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

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

Comment No. 12-4

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

Response to Comment No. 12-4

The zoning designation for the majority of the project site is [Q] C4-2D-O (Q Condition, Commercial, Height District No. 2, D Limitation, and Oil Drilling District). The “O” indicates that the project site is within an Oil Drilling District, a supplemental use district. This designation allows for the use of a controlled drill site. Historically oil was extracted in this area; however, there are no oil wells or oil production on the project site. The project site is not located within an Alquist-Priolo Earthquake Fault Zone. No known active faults are mapped as crossing the project site or projecting towards the project.
site. The closest active fault to the project is the Newport-Inglewood fault which is located approximately 2.8 miles southeast of the project site.

Comment No. 12-5

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

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

Response to Comment No. 12-5

This comment states an opinion about the project and the developer and does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR.
From: "Mark J. Wakim, Esq." <mjw@wakimlaw.com>
To: <Jimmy.Liao@LACITY.ORG>
Date: 9/28/2009 7:57 AM
Subject: Wilshire Crescent Heights - Resident Comment

Dear Jimmy:

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

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

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

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

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

Yours truly,

Mark J. Wakim
Attorney at Law
P.O. Box 481130
Los Angeles, CA 90048
(323) 617 4499
mailto:mwj@wakimlaw.com

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LETTER NO. 13

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

Comment No. 13-1

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

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

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

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

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

Response to Comment No. 13-1

Some of the issues raised by this comment express concern regarding economic and social conditions that are experienced by persons living today in high density urban areas such as the general area of the project. CEQA analysis is focused on impacts on the physical environment rather than economic or social conditions. Therefore, no analysis of economic issues is required or included in the Draft EIR. CEQA analysis itself is not intended as the sole tool for urban planning purposes.
September 28, 2009

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

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

Project Name: Wilshire Crescent Heights

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

Council District: CD 5

Dear Jimmy C. Liao:

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

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

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

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

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

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

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

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

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

At a recent community meeting one of the representatives for the Wilshire-Crescent project had the audacity to say that they could legally build something much worse under
the City of Los Angeles’s current building codes. It was said as if we should be thankful for the considerations they have made. Just because an area is zoned for a certain kind of business, or building does not always mean that it is a wise thing to do. Many of Los Angeles’s ills have been caused by past poor city planning and here is an opportunity to ensure that trend does not continue.

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

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

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

Sincerely,

Victoria Arch
Property Owner
6221 Orange Street #4
Los Angeles, CA 90048
LETTER NO. 14

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

Comment No. 14-1

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

Response to Comment No. 14-1

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

Comment No. 14-2

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

Response to Comment No. 14-2

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

\(^1\) Mitigation measure would install SB left-turn signal phasing for Crescent Heights – unacceptable to LADOT due to additional signal phase potentially resulting in higher vehicle and pedestrian delays at this intersection.
Wilshire Boulevard and Fairfax. The effectiveness of the recommended traffic signal improvements at 6th Street and Fairfax Avenue will be ultimately evaluated by LADOT staff in their review of the feasibility of these measures. This measure is consistent with the Mayor’s directive to install new left-turn phasing at key intersections throughout the City, in order to address ongoing and increasing traffic congestion. However, in order to provide the most conservative assessment, the Draft EIR concludes that the impact will remain significant despite the mitigation. Similarly, the project’s traffic impacts were analyzed without taking into account the project’s traffic demand management (TDM) program, which will include measures to reduce project-related vehicle trips.

**Comment No. 14-3**

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

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

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

**Comment No. 14-4**

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

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

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

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2 Mitigation measure would widen east side of Fairfax north of Wilshire to install new SB right-turn only lane – unacceptable to LADOT since the proposed measure has already been assigned to another project in the area and is currently under construction.
project applicant has met with residents of Orange Street to discuss the issue raised in the comment, and has volunteered to work with the community, LADOT, and the local Council Office to identify potential measures to address the concerns noted.

**Comment No. 14-5**

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

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

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

**Comment No. 14-6**

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

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

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

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

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

**Comment No. 14-7**

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

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

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

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

**Comment No. 14-8**

The height of the project is a great concern to many residents. We do not wish to have our sunlight blocked, which will affect electric and heating bills and right to enjoy our gardens. One neighbor has expressed concern over the view from her condominium which will be obscured and reduce her enjoyment as well as her ability to resell it.
Response to Comment No. 14-8

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

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

Comment No. 14-9

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

Response to Comment No. 14-9

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

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

Comment No. 14-10

At a recent community meeting one of the representatives for the Wilshire-Crescent project had the audacity to say that they could legally build something much worse under the City of Los Angeles's
current building codes. It was said as if we should be thankful for the considerations they have made. Just because an area is zoned for a certain kind of business, or building does not always mean that it is a wise thing to do. Many of Los Angeles's ills have been caused by past poor city planning and here is an opportunity to ensure that trend does not continue.

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

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

**Comment No. 14-11**

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

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

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

See Response to Comment No. 14-7 regarding construction impacts. The Draft EIR included analysis of hazardous materials and air pollution, including consideration of sensitive receptors (children and elderly people). Construction related daily emissions would not exceed SCAQMD significance thresholds for ROG, NOx, CO, SOx, PM10, and PM2.5 during construction. Specifically, the construction emissions would not exceed the localized significance thresholds, which are based on the most stringent ambient air quality standards.

Additionally, during operation the proposed project would generate a net increase in daily emissions that would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, operational emissions impacts would be less-than-significant. The Draft EIR also analyzed impacts during construction for hazardous materials such as lead-based paints, PCBs, ACMs, mold, and methane. These
impacts were all determined to be less than significant. Please see Sections IV. C, Air Quality, and IV.F, Hazards, of the Draft EIR for further discussion.

Comment No. 14-12

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

Response to Comment No. 14-12

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. CEQA analysis itself is not intended as the sole tool for urban planning purposes.
From: E Roach <eroach08@yahoo.com>
To: <jimmy.liao@lacity.org>
CC: <eroach08@yahoo.com>
Date: 9/28/2009 4:49 PM
Subject: REFERENCE NO: (ERI # ENV - 20080729-EIR)

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

Dear Mr. Liao:

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

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

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

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

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

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

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

Sincerely,
Elizabeth M. Roach
6300 Orange Street, LA, 90048
LETTER NO. 15

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

Comment No. 15-1

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

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

Response to Comment No. 15-1

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

Comment No. 15-2

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

Response to Comment No. 15-2

This comment includes opinions regarding existing traffic conditions and does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. The Draft EIR identified existing conditions at study intersection and local streets based on actual traffic
counts, the future levels of service at the study intersections for both the without project and with project scenarios, and the potential incremental project traffic impacts at each location.

**Comment No. 15-3**

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

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

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

**Comment No. 15-4**

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

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

The traffic study identified potentially significant impacts from project traffic at Wilshire and Fairfax (both peak hours), Wilshire and Crescent Heights (a.m. peak hour only), and 6th Street and Fairfax (p.m. peak hour only). The project would not have significant impacts at 6th Street and Crescent Heights, which would continue to operate at Level of Service (LOS) A in both the a.m. and p.m. peak hour. The traffic study identified mitigation measures at all three potentially impacted intersections to reduce these
impacts, but LADOT rejected the measures proposed for Wilshire Boulevard and Crescent Heights\(^3\) and Wilshire Boulevard and Fairfax\(^4\). The effectiveness of the recommended traffic signal improvements at 6th Street and Fairfax Avenue will be ultimately evaluated by LADOT staff in their review of the feasibility of these measures. This measure is consistent with the Mayor’s directive to install new left-turn phasing at key intersections throughout the City, in order to address ongoing and increasing traffic congestion. However, in order to provide the most conservative assessment, the Draft EIR concludes that the impact will remain significant despite the mitigation. Similarly, the project’s traffic impacts were analyzed without taking into account the project’s traffic demand management (TDM) program, which will include measures to reduce project-related vehicle trips.

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

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

**Comment No. 15-5**

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

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

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

\(^3\) Mitigation Measure would install SB left-turn signal phasing for Crescent Heights – unacceptable to LADOT due to additional signal phase potentially resulting in higher vehicle and pedestrian delays at this intersection.

\(^4\) Mitigation Measure would widen east side of Fairfax north of Wilshire to install new SB right-turn only lane – unacceptable to LADOT since the proposed measure has already been assigned to another project in the area and is currently under construction.
not to less than significance. These measures include minimizing the concurrent use of noisy equipment and locating such equipment as far as is feasible from the adjacent residential uses.

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

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

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

I will follow up with a paper copy.

Thanks,

Teresa Feldman

(323) 937-7787
September 28, 2008

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

Sent Via Email: Jimmy.Liao@lacity.org

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

Dear Mr. Liao:

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

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

Section IV.B – Aesthetics –

Orange Street, which is directly behind this project, is zoned [QR]-3-1-O; projects are limited in height to 45 feet, to provide an appropriate transition to 6th Street, which is zoned R-2-1, and has height limits of 33 feet. While the Applicant has endeavored to orient the project to the southwest corner of the site, the proposed 21-story height does not provide for an appropriate transition to the much lower residences to the north.
The report states that the project will not impact scenic views. However, there are at least two sites in the vicinity that will have their views impacted. There is a condominium building on the north side of Orange Street that is 4 stories tall and has a rooftop deck and pool. This building's views will be affected by this project. In addition, a commercial building at 6317 Wilshire Boulevard, currently a medical office building, is scheduled for Adaptive Reuse into a hotel with rooftop garden and pool. The views to the northeast will be wiped out with the completion of the 21-story tower.

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

Section IV.H - Land Use

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

Section IV.I - Noise

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

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

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

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

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

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

Section IV.L – Traffic/Transportation

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

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

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

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

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

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

Sincerely,

Teresa Kiely Feldman
6231 West 6th Street
Los Angeles, CA 90048

(323) 937-7787
LETTER NO. 16

Theresa Feldman
mrsfeldo@aol.com

Comment No. 16-1

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

I will follow up with a paper copy.

Response to Comment No. 16-1

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

Comment No. 16-2

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

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

Response to Comment No. 16-2

The Draft EIR included analysis of all CEQA-required topics and disclosed all impacts, including significant and avoidable impacts to winter shade/shadows, construction noise and vibration levels, and traffic/transportation impacts. In order to approve the project despite these impacts, the City decision-makers would need to adopt a statement of overriding considerations. The commenter did not specifically state what the “unique elements” are of the neighborhood or what “other impacts that are more significant”. Nor does the commenter specify the project alterations that would purportedly address these issues. Therefore, it is not possible to address those concerns. This comment does not state a specific
concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR, but states the author’s opinion regarding the need for alteration of the project. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. It should also be noted that the applicant has volunteered to work with the community, LADOT, and the local Council Office to identify potential measures to address residents’ concerns regarding cut through traffic.

Comment No. 16-3

Section IV.B - Aesthetics -

Orange Street, which is directly behind this project, is zoned [Q]R-3-I-0; projects are limited in height to 45 feet, to provide an appropriate transition to 6th Street, which is zoned R-2-I, and has height limits of 33 feet. While the Applicant has endeavored to orient the project to the southwest corner of the site, the proposed 21-story height does not provide for an appropriate transition to the much lower residences to the north.

Response to Comment No. 16-3

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

Comment No. 16-4

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

Response to Comment No. 16-4

Views of the project site would not obstruct, totally block, partially interrupt or create a minor diminishment of a valued public view or provide a visual element that would considerably deter from a valued public view as there are no valued public views in the immediate vicinity. Views from locations on private property are not protected under CEQA or by the City of Los Angeles CEQA Thresholds.
Moreover, the project would not block private views of scenic vistas or valued visual resources from either of the properties cited in the comment, as the existing views through the project site consist primarily of buildings and sky. Further, the building would constitute only a small portion of the viewshed. Therefore, even if private views were projected, the project’s impacts on these views would not be significant.

**Comment No. 16-5**

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

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

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

**Comment No. 16-6**

Section IV.H - Land Use

A commercial corridor such as Wilshire Boulevard is the appropriate place for a project of the proposed height and density such as the one proposed. However, given the proximity to the much lower density neighborhood to the north, and the [Q] conditions which limit Orange Street dwellings to 45 feet in height, the Planning Department must treat this site as a transitional site, and require alterations to the project to bring it more in line with the neighborhood to the north. Alternative 4, the Reduced Height Alternative, is not an appropriate alternative, as its massing would have a different, but still negative, impact on the neighborhood. A reduction in both density and height, along with traffic calming measures, would seem to be appropriate for this project.
Response to Comment No. 16-6

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

Comment No. 16-7

Section IV.I - Noise

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

Response to Comment No. 16-7

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

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

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

I-8 During construction, an approximate 15-foot, temporary plywood barrier shall be erected along the northern boundary of the project site to reduce construction noise impacts on nearby sensitive receptors. The plywood barrier shall be erected prior to demolition activities and remain in place until exterior construction has been completed.
Comment No. 16-8

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

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

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

Response to Comment No. 16-8

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

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

Comment No. 16-9

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

Response to Comment No. 16-9

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

Comment No. 16-10

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

Response to Comment No. 16-10

The Quimby Act (Government Code Section 66477) authorizes local agencies to enact ordinances which would require the dedication of land or payment of fees for park or recreational purposes for projects involving residential subdivisions. The City of Los Angeles has established a local ordinance, Los
Angeles Municipal Code (LAMC) Section 17.12 (Park and Recreation Site Acquisition and Development Provisions), which implements the Quimby Act. The purpose of the LAMC Section 17.12 is to enable the City to meet the park and recreation needs generated by residential projects. The project will pay Quimby Fees as required by the City of Los Angeles. These fees will be used to acquire or improve parks in the project vicinity. Therefore, impacts on parks and recreation will be less than significant.

Comment No. 16-11

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

Response to Comment No. 16-11

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

Comment No. 16-12

Section IV.L - Traffic/Transportation

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

Response to Comment No. 16-12

The descriptions of the potential project impacts are described fully in the Draft EIR. Further, potential (recommended) traffic mitigation measures to address these impacts are also noted in the project traffic study (Appendix H of the Draft EIR). LADOT reviewed these preliminary mitigation recommendations, and determined that they were not feasible at two of the locations. To provide a conservative assessment, the Draft EIR concluded that mitigation at the third location would not reduce the project’s impacts to less than significant. As a result, the Draft EIR concludes that impacts will remain significant and unavoidable at all three intersections. The proposed Wilshire Bus Lane Project is currently underway with its Environmental Assessment, and since this project is not currently approved, the traffic study for the proposed Wilshire/Crescent Heights project did not assume or rely on its effects to reduce potential
project trips, and as such, the traffic study presents a “worst case” analysis of potential project impacts. Additionally, while the introduction of this convenient transit facility in close proximity to the proposed Wilshire/Crescent Heights project is likely to encourage greater transit utilization by project residents, visitors, and patrons, specific project-related transit ridership estimates cannot be identified until detailed bus headways and schedules are identified. However, it is anticipated that the proposed Wilshire Bus Lane Project environmental assessments will include estimates of the anticipated potential ridership demands along its route, including the proposed Wilshire/Crescent Heights project, and that the Bus Lane project will include sufficient capacity to accommodate patronage by the proposed Wilshire/Crescent Heights project as well as other proposed and ongoing developments along its route; no significant Wilshire/Crescent Heights project-related impacts to future bus or other transit facilities are anticipated. Additionally, it should be noted that increased transit utilization by residents or visitors of the Wilshire/Crescent Heights project will act to reduce the project’s potential traffic impacts as identified in the Draft EIR. Further, the Wilshire BRT project environmental assessment will be required to evaluate that project’s potential effects and impacts to traffic along the Wilshire Boulevard corridor, and to provide recommendations to mitigate such impacts to the extent feasible; any such impacts are beyond the control of the Wilshire/Crescent Heights project. Therefore, as the impacts of the Wilshire BRT project and its potential mitigation measures have not yet been identified, it is beyond the scope of analysis of the proposed Wilshire/Crescent Heights project to include speculative impacts from this as-yet unapproved and not fully-defined transit project.

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

Comment No. 16-13

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

Response to Comment No. 16-13

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

Comment No. 16-14

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

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

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

Response to Comment No. 16-14

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

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

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

Comment No. 16-15

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

Response to Comment No. 16-15

The Draft EIR included an analysis of four alternatives to the proposed project. See Section VI. Alternatives, for more details. Consistent with CEQA, these alternatives are intended to substantially reduce or eliminate the significant impact of the proposed project while still meeting most of the project objectives. As the commenter does not propose any specific alternative or mitigation, no further response is possible.
From: <amyg93@aol.com>
To: <jimmy.hao@lacity.org>
Date: 9/29/2009 10:06 AM
Subject: Wilshire and Crescent Heights,

Dear Sir:

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

Is there no end to this?? As it is, the residents that live here

cannot get thru and now this.

Please, please do something to prevent this useless project.

Amy galaudet

Tom Challener

6120 W. 5th St.

Los Angeles, Calif 90048
LETTER NO. 17

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

Comment No. 17-1

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

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

Please, please do something to prevent this useless project.

Response to Comment No. 17-1

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.
From: <mjw@wakimlaw.com>
To: "Jimmy Liao" <Jimmy.Liao@lacity.org>
CC: <mjw@wakimlaw.com>
Date: 9/29/2009 1:40 PM
Subject: Re: Wilshire Crescent Heights - Resident Comment(ENV-2008-0729-EIR)

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

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

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

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

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

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

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

Yours truly,

Mark Wakim
LETTER NO. 18

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

Comment No. 18-1

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

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

Response to Comment No. 18-1

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

Comment No. 18-2

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

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

Response to Comment No. 18-2

The comment speculates that most of the project traffic will utilize 6th Street. As stated in Section IV.L, Traffic and Transportation, observations of the study area indicate that existing traffic congestion throughout the area, particularly during peak commute traffic periods on Wilshire Boulevard, 6th Street, Crescent Heights Boulevard, and Fairfax Avenue result in high utilization of many of the local/residential streets in the area by commuters and local residents seeking to avoid long delays. The anticipated increases in area traffic resulting from both ambient traffic growth and ongoing development are expected to exacerbate this “cut through” traffic, and it is likely that some project visitors, patrons, and/or employees will themselves use some of the area residential streets as alternative travel routes to and from the project site.
Therefore, an additional analysis was conducted to determine the potential for project impacts on the segments of La Jolla Avenue between 6th Street and Wilshire Boulevard, and along Orange Street adjacent to the project site, and to the west of Crescent Heights Boulevard. These locations were selected as the local/residential street segments most likely to be impacted by the project’s traffic, as they will exhibit the potentially highest project traffic additions, as vehicles converge on the project site from around the project area. The results of the analysis of potential neighborhood traffic impacts are summarized in Table IV.L-8 of the Draft EIR.

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

Comment No. 18-3

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

Response to Comment No. 17-3

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

Comment No. 18-4

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

Response to Comment No. 18-4

The comment expressed an opinion regarding existing traffic conditions. The Draft EIR included an analysis of cumulative impacts and identified the future levels of service at the study intersections for both the without project and with project scenarios, as well as the potential incremental project traffic impacts at each location.

The results of the analyses contained above indicate that the proposed project could potentially result in significant traffic impacts at three of the 11 study intersections during one or both peak hours at 6th Street and Fairfax Avenue (PM peak hour); Wilshire Boulevard and Crescent Heights
Boulevard/McCarthy Vista (AM peak hour); and Wilshire Boulevard and Fairfax Avenue (both peak hours). Therefore, a review of the existing intersection and roadway geometries and operations was undertaken to identify feasible roadway system improvements to mitigate these potential impacts. The area roadway system is currently substantially improved, and there are few available rights-of-way or unimproved roadway segments with which to construct any meaningful new roadway or intersection capacities. Additionally, the area traffic signal network has already been upgraded with both the ATSAC and second-generation ATCS signal coordination systems, and no additional signal operation enhancements are available. Therefore, potential mitigation measures have been incorporated into this project. However, the mitigation measures for this project are relegated to operational improvements based on the forecast traffic demand patterns, such as converting the operations of existing lanes to better accommodate future travel patterns, or the addition of short turn lanes to improve “through” traffic movements at the intersections, where feasible.

Comment No. 18-5

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

Response to Comment No. 18-5

This Final EIR is being prepared to respond to comments on the Draft EIR submitted during the review period. The Final EIR modifies the Draft EIR as required. Public hearings on the proposed project will be held after completion of the Final EIR. The City will make the Final EIR available to agencies and the public prior to considering certification of the EIR and approval of the project. Notice of the time and location will be published prior to the public hearing date.
20 September 2009

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

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Liao,

My name is Christine Scotti and I am writing on behalf of a group of residents, myself included, at 6151 Orange Street. We are located within the immediate area of the proposed Wilshire Crescent Project and as residents of this community we would like to voice our opposition to this project.

We are deeply concerned with issues that have been raised in the draft EIR provided by the LA Department of City Planning as well as other issues not brought up. The most significant of these issues being the following:

1. Traffic and Transportation

   We are already heavily burdened with traffic from Fairfax Avenue on the east and Crescent Heights on the west. Additionally, there are two 99¢ stores in the immediate area (Wilshire & Fairfax and Fairfax & 6th St), placing another traffic burden on Orange Street. Residents of Orange Street that are traveling in both the east and west directions are subjected to significant delays in gaining access to and from our street because of the inadequate parking lot design at the Wilshire/Fairfax store. This lot does not have a pass through, requiring people to back in and out of one side of the lot thereby trapping anyone who is trying to travel up or down Orange Street. At the same time, people are trying to access the Fairfax/6th St store through the alley behind the store parallel to Fairfax Ave, and this causes additional delays, accidents, and back-ups along the east end of our street.

   Per the draft EIR, there will be a significant increase in traffic at multiple intersections in the immediate area. The three most significant areas, Wilshire/Crescent Heights, Wilshire/Fairfax, and Fairfax/6th Street currently surround Orange Street. The draft EIR notes a conservative estimate of an increase in the number of daily trips to be approximately 1,655 across these three intersections, which will result in a significant increase in the amount of traffic and transportation along Orange Street. Our street is constantly used as a "cut-through" for people trying to avoid the traffic congestion at these three intersections. We deal with an influx of cars cutting up and down our street on a daily basis - most with no regard for the speed limit and at all hours of the day and this will only intensify if this proposed development is approved.

   Lastly, the draft EIR states that at these intersections there are “no feasible physical
improvements available to mitigate the project’s impact at these locations.” This proposed development would create additional blockage at the east end of Orange Street as well as significant blockage at the west end of Orange Street and there are no improvements to be made at either end of Orange Street that would help alleviate this congestion for the residents.

2. Noise and Vibration Levels

In addition to the permanent increase in noise and vibrations levels as a result of the significant traffic/transportation increase, we are concerned with the increase in noise and vibration levels during the 18-month construction period. From 7AM-9PM, six days a week, residents would be subjected to intense vibration and noise increases from heavy equipment, generators, high-powered tools as a result of the demolition, clearing, and construction of the proposed development.

It is also our understanding that city of Los Angeles METRO plans a subway stop at the Wilshire/Fairfax intersection within the next several years which again is going to create huge environmental, parking/traffic issues, and noise and vibration issues within very close proximity of the planned development.

Additionally, during the construction process there are invariably areas of the adjoining streets that are cordoned as parking spaces for heavy equipment, which increases the noise and vibration levels to the residential area while this equipment is moved in and out of the project site.

3. Aesthetics, Views and Obstructions

Contrary to the draft EIR report, the residents of 6151 Orange Street do not feel that the proposed project would add any significant visual character or aesthetic quality to our neighborhood. Based on the provided rendering, the building shows no unique architectural or design characteristics that set it apart from any of the immediately surrounding buildings. We do not feel, nor necessarily want, another tall building contributing to “a more dynamic landscape and skyline.” We also do not feel that the proposed development would complement any of the other uses within the area. From where we reside, it will look like another concrete and glass tower with a fresh coat of paint.

For the residents on the south side of the building and for those residents who are utilizing the pool facilities on the top of the building, their southwest view would be completely obstructed as a result of this proposed structure.

Most importantly, the quality of a city view is taken into consideration in property valuation. Contrary to the EIR, the building would obstruct the view of south facing residences thereby further reducing property values in an already declining market.

At present we have a significant and unobstructed view toward the southwest, which provides us with a clear, open view of the sky, trees and on clearer days, the South Bay area and the Pacific Ocean. Again, contrary to the draft EIR, we VALUE
this view and do not wish to have it disappear for the sake of this proposed development.

4. Winter Shade/Shadows

According to the draft EIR, there will be significant impact on our neighborhood with regards to winter shade and shadows. The winter shade/shadows would directly affect adjacent properties resulting in a loss of natural light and warmth for the residents in the immediate area and within these properties.

5. LEED Construction Practices

As residents of 6151 Orange Street, we were very disheartened at the lack of accountability this proposed development will have in the role of global climate change. While it may be true that this specific project is to small to have any significant impact on global climate change, it is this type of rhetoric that will continue to let companies skate by the issue of global warming. Yes, one project alone may not have an impact, but the thousands of current projects under construction in the Los Angeles Metropolitan Area do have a significant negative impact on global climate change. To not hold companies accountable for the practices used in the construction of large-scale developments such as these we are turning a blind eye to the negative impacts on the environment that these projects have.

While the development company states that the residential portion of their development will be “constructed to maximize building efficiency with LEED characteristics...” there are substantially more LEED practices that could be and should be implemented for a project of this magnitude. At a minimum, we should demand that the proposed development implement the following LEED programs:

- **LEED Core & Shell** - practices which covers base building elements such as structure, envelope and the HVAC system
- **LEED New Construction** - which includes the incorporation of recycled materials, using certified wood and recycling construction debris
- **LEED for Commercial Interiors** - which covers sustainable sites, water efficiency, energy and atmosphere, materials and resources, indoor environmental quality, and innovative applications

6. Public Service Resources

In addition to the current proposed development, there are several other developments within the immediate area (less than 1 mile from the site) that would rely on public service resources; fire, police, parks & recreation, and library. On Wilshire Blvd alone, there are currently four new developments or redevelopments which are under construction including:

a. Wilshire & La Brea – 14 story mixed-use development, 645 residential units
b. 5528-5500 Wilshire Blvd – 11 story mixed-use redevelopment, 175 residential units

c. 5550 Wilshire Blvd – 6 story mixed use development, 163 residential condominiums

d. 5600 Wilshire Blvd – 6 story mixed use development, 284 residential units. Ground floor commercial currently only occupied by one tenant.

e. 637 S. Fairfax Blvd – 7 story mixed use development, ~30 residential condos. Currently this property is in foreclosure after a failed sales and lease effort. Currently, there are only ~4 units leased and the ground floor commercial currently has no tenants.

This totals approximately 1300 residential units with a one-mile vicinity of the proposed development.

Contrary to the draft EIR, we feel this puts a heavy burden on our public resources, most of which are facing serious budget cuts due to the financial crisis that the city of Los Angeles is currently experiencing. As recent as one week ago, it was revealed that city employees, including accountants, building planners, librarians and maintenance crews were facing layoffs and furloughs.

The city has already laid off 300 police cadets and is considering a proposal to freeze LAPD hiring. The Fire Department has been instructed to cut salaries and has already begun taking fire trucks and ambulances out of service.

As residents of this community, we feel that this and many other development companies are operating under the “If you build it, they will come” mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

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

Sincerely,

Christine Kollig Scotti
6151 Orange Street, #316
Los Angeles, CA 90048
323.842.4032
cscotti@me.com
LETTER NO. 19

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

Comment No. 19-1

My name is Christine Scotti and I am writing on behalf of a group of residents, myself included, at 6151 Orange Street. We are located within the immediate area of the proposed Wilshire Crescent Project and as residents of this community we would like to voice our opposition to this project.

We are deeply concerned with issues that have been raised in the draft EIR provided by the LA Department of City Planning as well as other issues not brought up. The most significant of these issues being the following:

Response to Comment No. 19-1

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

Comment No. 19-2

1. Traffic and Transportation

We are already heavily burdened with traffic from Fairfax Avenue on the east and Crescent Heights on the west. Additionally, there are two 99¢ stores in the immediate area (Wilshire & Fairfax and Fairfax & 6th St), placing another traffic burden on Orange Street. Residents of Orange Street that are traveling in both the east and west directions are subjected to significant delays in gaining access to and from our street because of the inadequate parking lot design at the Wilshire/Fairfax store. This lot does not have a pass through, requiring people to back in and out of one side of the lot thereby trapping anyone who is trying to travel up or down Orange Street. At the same time, people are trying to access the Fairfax/6th St store through the alley behind the store parallel to Fairfax Ave, and this causes additional delays, accidents, and back-ups along the east end of our street.

Response to Comment No. 19-2

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

Comment No. 19-3

Per the draft EIR, there will be a significant increase in traffic at multiple intersections in the immediate area. The three most significant areas, Wilshire/Crescent Heights, Wilshire/Fairfax, and Fairfax/6th Street currently surround Orange Street. The draft EIR notes a conservative estimate of an increase in the number of daily trips to be approximately 1,655 across these three intersections, which will result in a significant increase in the amount of traffic and transportation along Orange Street. Our street is constantly used as a "cut-through" for people trying to avoid the traffic congestion at these three intersections. We deal with an influx of cars cutting up and down our street on a daily basis - most with no regard for the speed limit and at all hours of the day and this will only intensify if this proposed development is approved.

Response to Comment No. 19-3

The results of the analyses indicate that the proposed project could potentially result in significant traffic impacts at three of the 11 study intersections during one or both peak hours; at 6th Street and Fairfax Avenue (PM peak hour), at Wilshire Boulevard and Crescent Heights Boulevard/McCarthy Vista (AM peak hour), and at Wilshire Boulevard and Fairfax Avenue (both peak hours). The Draft EIR acknowledges significant and unavoidable impacts from these impacts.

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

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

As shown in Table IV.L-8, the development of the project is not expected to produce significant traffic impacts on any of the local/residential street segments analyzed. Although it is expected that project
traffic will occur on these, and possibly other, local/residential streets in the general vicinity as project residents, visitors, patrons, and employees travel to and from the new development, these project-related volumes will be well below the thresholds for significance.

Comment No. 19-4

Lastly, the draft EIR states that at these intersections there are "no feasible physical improvements available to mitigate the project's impact at these locations." This proposed development would create additional blockage at the east end of Orange Street as well as significant blockage at the west end of Orange Street and there are no improvements to be made at either end of Orange Street that would help alleviate this congestion for the residents.

Response to Comment No. 19-4

The traffic study identified potentially significant impacts from project traffic at Wilshire and Fairfax (both peak hours), Wilshire and Crescent Heights (a.m. peak hour only), and 6th Street and Fairfax (p.m. peak hour only). The project would not have significant impacts at 6th Street and Crescent Heights, which would continue to operate at Level of Service (LOS) A in both the a.m. and p.m. peak hour. The traffic study identified mitigation measures at all three potentially impacted intersections to reduce these impacts, but LADOT rejected the measures proposed for Wilshire Boulevard and Crescent Heights and Wilshire Boulevard and Fairfax. The effectiveness of the recommended traffic signal improvements at 6th Street and Fairfax Avenue will be ultimately evaluated by LADOT staff in their review of the feasibility of these measures. This measure is consistent with the Mayor’s directive to install new left-turn phasing at key intersections throughout the City, in order to address ongoing and increasing traffic congestion. However, in order to provide the most conservative assessment, the Draft EIR concludes that the impact will remain significant despite the mitigation. Similarly, the project’s traffic impacts were analyzed without taking into account the project’s traffic demand management (TDM) program, which will include measures to reduce project-related vehicle trips.

Comment No. 19-5

2. Noise and Vibration Levels

In addition to the permanent increase in noise and vibrations levels as a result of the significant traffic/transportation increase, we are concerned with the increase in noise and vibration levels during the 18-month construction period. From 7AM-9PM, six days a week, residents would be subjected to intense vibration and noise increases from heavy equipment, generators, high-powered tools as a result of the demolition, clearing, and construction of the proposed development.

Response to Comment No. 19-5

The Draft EIR includes mitigation measures that would be required to reduce noise and vibration levels associated with construction at the project upon the adjacent multi-family residences. However, the Draft EIR acknowledges that there would be significant and unavoidable impacts from construction noise and
vibration. In the context of CEQA analysis, the term “temporary construction impacts” is used to identify environmental impacts of constructing a specific project (to the extent reasonably feasible) so that such temporary impacts can be mitigated to the extent reasonably feasible. “Temporary construction impacts” end once a specific project is completed, as distinguished from a project’s continuing “operational” environmental impacts, which continue while the project is occupied and operating. CEQA analysis tends to focus on temporary construction impacts that are more localized in the nature of their environmental impacts (for example, construction equipment noise or emissions) because they are more susceptible to standards of significance and mitigation. Construction activities, as a more generalized condition of urban life and activities tend to be less susceptible to segregation, quantification, standards of significance and mitigation.

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

Comment No. 19-6

It is also our understanding that city of Los Angeles METRO plans a subway stop at the Wilshire/Fairfax intersection within the next several years which again is going to create huge environmental, parking/traffic issues, and noise and vibration issues within very close proximity of the planned development.

Response to Comment No. 19-6

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

Comment No. 19-7

Additionally, during the construction process there are invariably areas of the adjoining streets that are cordoned as parking spaces for heavy equipment, which increases the noise and vibration levels to the residential area while this equipment is moved in and out of the project site.

Response to Comment No. 19-7

See Response to Comment No. 19-5.

Comment No. 19-8

3. Aesthetics, Views and Obstructions
Contrary to the draft EIR report, the residents of 6151 Orange Street do not feel that the proposed project would add any significant visual character or aesthetic quality to our neighborhood. Based on the provided rendering, the building shows no unique architectural or design characteristics that set it apart from any of the immediately surrounding buildings. We do not feel, nor necessarily want, another tall building contributing to "a more dynamic landscape and skyline." We also do not feel that the proposed development would complement any of the other uses within the area. From where we reside, it will look like another concrete and glass tower with a fresh coat of paint.

Response to Comment No. 19-8

The project site is located within an established commercial neighborhood containing a mix of buildings. Implementation of the proposed project would replace a surface parking lot and a one-story bank building with a new, contemporary building that is visually compatible with the several newer or recently renovated high rise buildings in the vicinity of the project site. The area is slowly undergoing redevelopment to create a more dynamic landscape and skyline reflective of the scale of Wilshire Boulevard as a major transportation and activity corridor. The proposed project does not distract from the unique image of other buildings in the area, but rather complements other uses. The building, as designed, is modern in style and is intended to lend a complementary, yet distinct, commercial character which would be integrated into the Wilshire Boulevard street frontage, as well as the overall project design. This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 19-9

For the residents on the south side of the building and for those residents who are utilizing the pool facilities on the top of the building, their southwest view would be completely obstructed as a result of this proposed structure.

Most importantly, the quality of a city view is taken into consideration in property valuation. Contrary to the EIR, the building would obstruct the view of south facing residences thereby further reducing property values in an already declining market. At present we have a significant and unobstructed view toward the southwest, which provides us with a clear, open view of the sky, trees and on clearer days, the South Bay area and the Pacific Ocean. Again, contrary to the draft EIR, we VALUE this view and do not wish to have it disappear for the sake of this proposed development.

Response to Comment No. 19-9

Views from locations on private property are not protected under CEQA or by the City of Los Angeles CEQA Thresholds. Views of the project site would not obstruct, totally block, partially interrupt or create a minor diminishment of a valued public view or provide a visual element that would considerably deter from a valued public view as there are no valued public views in the immediate vicinity. Therefore there
would be no significant impact on public views associated with the Proposed Project. The comment does not identify a specific flaw of the Draft EIR and expresses opinions about the project and property values. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 19-10

4. Winter Shade/Shadows

According to the draft EIR, there will be significant impact on our neighborhood with regards to winter shade and shadows. The winter shade/shadows would directly affect adjacent properties resulting in a loss of natural light and warmth for the residents in the immediate area and within these properties.

Response to Comment No. 19-10

The Draft EIR acknowledges significant and unavoidable impacts to shade/shadow. See Section IV.B. Aesthetics of the Draft EIR.

Comment No. 19-11

5. LEED Construction Practices

As residents of 6151 Orange Street, we were very disheartened at the lack of accountability this proposed development will have in the role of global climate change. While it may be true that this specific project is too small to have any significant impact on global climate change, it is this type of rhetoric that will continue to let companies skate by the issue of global warming. Yes, one project alone may not have an impact, but the thousands of current projects under construction in the Los Angeles Metropolitan Area do have a significant negative impact on global climate change. To not hold companies accountable for the practices used in the construction of large-scale developments such as these we are turning a blind eye to the negative impacts on the environment that these projects have.

Response to Comment No. 19-11

The Draft EIR included an analysis of the project’s contribution to global warming. At the time that this Draft EIR was being prepared, no air agency or municipality had yet established project-level significance thresholds for GHGs emissions. As such, GHG emissions were quantified, but could not be used to determine significance under CEQA. The proposed project would be consistent with the 2006 CAT Report strategies and incorporate several design features that exceed Title 24 Standards. Therefore, the implementation of the proposed project would not result in an unplanned level of development and does not represent a substantial new source of GHG emissions. For these reasons, the impact of the project to the cumulative effect of global climate change is not cumulatively considerable and is, therefore, considered to be less than significant.
**Comment No. 19-12**

While the development company states that the residential portion of their development will be "constructed to maximize building efficiency with LEED characteristics ..." there are substantially more LEED practices that could be and should be implemented for a project of this magnitude. At a minimum, we should demand that the proposed development implement the following LEED programs:

- **LEED Core & Shell** - practices which covers base building elements such as structure, envelope and the HVAC system
- **LEED New Construction** - which includes the incorporation of recycled materials, using certified wood and recycling construction debris
- **LEED for Commercial Interiors** - which covers sustainable sites, water efficiency, energy and atmosphere, materials and resources, indoor environmental quality, and innovative applications

**Response to Comment No. 19-12**

The proposed project would be constructed to maximize building efficiency with LEED characteristics. The proposed project has been registered for LEED “New Construction.” LEED for “Core & Shell” requirements to not apply as those aspects are covered in “New Construction,” which is much more comprehensive. LEED for “Commercial Interiors” refers to future tenant improvements for commercial tenants. The comment does not identify a specific flaw of the Draft EIR and expresses opinions about the project and the level of LEED practices that would be implemented. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

**Comment No. 19-13**

6. Public Service Resources

In addition to the current proposed development, there are several other developments within the immediate area (less than 1 mile from the site) that would rely on public service resources; fire, police, parks & recreation, and library. On Wilshire Blvd alone, there are currently four new developments or redevelopments which are under construction including:

a. Wilshire & La Brea - 14 story mixed-use development, 645 residential units

b. 5528-5500 Wilshire Blvd - 11 story mixed-use redevelopment, 175 residential units

c. 5550 Wilshire Blvd - 6 story mixed use development, 163 residential condominiums

d. 5600 Wilshire Blvd - 6 story mixed use development, 284 residential units. Ground floor commercial currently only occupied by one tenant.
e. 637 S. Fairfax Blvd - 7 story mixed use development, ~ 30 residential condos. Currently this property is in foreclosure after a failed sales and lease effort. Currently, there are only ~ 4 units leased and the ground floor commercial currently has no tenants.

This totals approximately 1300 residential units with a one-mile vicinity of the proposed development.

Contrary to the draft EIR, we feel this puts a heavy burden on our public resources, most of which are facing serious budget cuts due to the financial crisis that the city of Los Angeles is currently experiencing. As recent as one week ago, it was revealed that city employees, including accountants, building planners, librarians and maintenance crews were facing layoffs and furloughs.

The city has already laid off 300 police cadets and is considering a proposal to freeze LAPD hiring. The Fire Department has been instructed to cut salaries and has already begun taking fire trucks and ambulances out of service.

**Response to Comment No. 19-13**

The Draft EIR included an analysis of cumulative impacts to public services, which included a list of related projects in a specified geographic area. All proposed (those with pending applications), recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment when considered in conjunction with the proposed project are included in the EIR.

**Comment No. 19-14**

As residents of this community, we feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

We ask that the Los Angeles Department of City Planning support us in opposing this proposed development

**Response to Comment No. 19-14**

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

From: deniselampron@aol.com
Sent: Tuesday, September 01, 2009 5:12 PM
To: BETTY.WONG@LACITY.ORG
Subject: Wilshire Crescent Heights Project | EIR Case No. ENV-2008-0729-EIR

Ms. Wong,

As our Neighborhood Empowerment Analyst for the Mid City West Community Council, I am writing to you regarding the above matter.

As a resident within the Mid City West Community Council (6151 Orange Street), my neighbors and I are deeply concerned about the pending project at Wilshire and Crescent Heights and would like to contact our neighborhood council representative. Are you this individual or can you direct me to this person?

We are already heavily burdened with traffic from Fairfax Avenue on the east and Crescent Heights on the west. Additionally, there are two 99¢ stores in the immediate area placing another traffic burden on Orange Street.

Last year there was a large condo construction project at the corner of 6th and Fairfax, resulting in few if any sales. It is basically a vacant building, which raises other concerns of vagrancy.

I understand that METRO plans a subway stop at Wilshire and Fairfax in the next several years which again is going to create huge environmental, parking and traffic issues within very close proximity of the planned development.

My neighbors and I would like to discuss all of the above issues with our representative as soon as possible. From the paperwork presented by the City of Los Angeles, we have until September 28, 2009 to submit our requests/concerns.

Thank you,
Denise Lampron
6151 Orange Street, Unit 319
Los Angeles, CA 90048-4655

9/2/2009
LETTER NO. 20

Denise Lampron
6151 Orange Street, Unit 319
Los Angeles, CA  90048-4855

Comment No. 20-1

As our Neighborhood Empowerment Analyst for the Mid City West Community Council, I am writing to you regarding the above matter.

As a resident within the Mid City West Community Council (6151 Orange Street), my neighbors and I are deeply concerned about the pending project at Wilshire and Crescent Heights and would like to contact our neighborhood council representative. Are you this individual or can you direct me to this person?

Response to Comment No. 20-1

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. This comment was forwarded to Jimmy Liao with the City of Los Angeles Department of City Planning.

Comment No. 20-2

We are already heavily burdened with traffic from Fairfax Avenue on the east and Crescent Heights on the west. Additionally, there are two 99¢ stores in the immediate area placing another traffic burden on Orange Street.

Response to Comment No. 20-2

The Draft EIR included an analysis of traffic impacts and identified the future levels of service at the study intersections for both the without project and with project scenarios, as well as the potential incremental project traffic impacts at each location.

The comment provides an opinion as to existing traffic conditions in the vicinity of the project site. This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA.

Comment No. 20-3

Last year there was a large condo construction project at the corner of 6th and Fairfax, resulting in few if any sales. It is basically a vacant building, which raises other concerns of vagrancy.
Response to Comment No. 20-3

The issue raised by the comment express concern regarding economic and social conditions that are experienced by persons living today in high density urban areas such as the general area of the project. CEQA analysis is focused on impacts on the physical environment rather than economic or social conditions. Therefore, no analysis of economic issues is required or included in the Draft EIR. This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR.

Comment No. 20-4

I understand that METRO plans a subway stop at Wilshire and Fairfax in the next several years which again is going to create huge environmental, parking and traffic issues within very close proximity of the planned development.

Response to Comment No. 20-4

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

Comment No. 20-5

My neighbors and I would like to discuss all of the above issues with our representative as soon as possible. From the paperwork presented by the City of Los Angeles, we have until September 28, 2009 to submit our requests/concerns.

Response to Comment No. 20-5

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

We are deeply concerned with the following issues:

☐ Traffic and Transportation
☐ Noise and Vibration Levels
☐ Aesthetics, Views and Obstructions
☐ Winter Shade/Shadows
☐ LEED Construction Practices
☐ Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

We feel that this and many other development companies are operating under the “If you build it, they will come” mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

[Signature]

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A1

Signature is illegible and no contact information is provided.

Comment No. 21 A1-1

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

Response to Comment No. 21 A1-1

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

Comment No. 21 A1-2

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

Response to Comment No. 21 A1-2

The Draft EIR includes analysis of traffic and transportation; noise and vibration; aesthetics, including winter shade/shadow; energy, and public services. The project would be required to incorporate mitigation measures to reduce impacts, where feasible. Additionally, alternatives were analyzed to further reduce impacts to shade/shadow. This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.
Comment No. 21 A1-3

We feel that this and many other development companies are operating under the "If you build it, they will come" mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

We ask that the Mid City West Community Council support us in opposing this proposed development.

Response to Comment No. 21 A1-3

This comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Selling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

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☐ Traffic and Transportation
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We feel that this and many other development companies are operating under the “If you build it, they will come” mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A2

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A2

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

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☐ Traffic and Transportation
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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

[Signature]

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A3

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A3

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

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☐ Traffic and Transportation
☐ Noise and Vibration Levels
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☐ LEED Construction Practices
☐ Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

[Signature]

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A4

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A4

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A5

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A5

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

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☐ Aesthetics, Views and Obstructions
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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A6

Signature is illegible and no contact information is provided.

Response to Letter No. 20 A6

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

[Signature]

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A7

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A7

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

[Signature]

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A8

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A8

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

[Signature]

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A9

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A9

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A10

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A10

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A11

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A11

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009
Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

Melissa Cabrera

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A12

Signature is illegible and no contact information is provided.

**Response to Letter No. 21 A12**

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

George Ralph Shaw

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A13

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A13

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

Maria Richards

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A14

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A14

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

[Signature]

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A15

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A15

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

[Signature]

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A16

Marzena Gieurojc

Response to Letter No. 21 A16

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

Andrew Kennedy
Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A17

Andrew Kennedy

Response to Letter No. 21 A17

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

[Signature]

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A18

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A18

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

[Signature]

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A19

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A19

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

[Signature]

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A20

Gayle Hollis

Response to Letter No. 21 A20

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

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Sincerely,

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A21

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A21

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

Christine Yamagata

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A22

Christine Yamagata

Response to Letter No. 21 A22

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

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☐ LEED Construction Practices
☐ Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

We feel that this and many other development companies are operating under the “If you build it, they will come” mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

[Signature]

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A23

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A23

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

We are deeply concerned with the following issues:

- Traffic and Transportation
- Noise and Vibration Levels
- Aesthetics, Views and Obstructions
- Winter Shade/Shadows
- LEED Construction Practices
- Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

We feel that this and many other development companies are operating under the “If you build it, they will come” mentality. We cannot jeopardize the health and safety of our residents for a development that offers no benefit to our community.

We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

[Signature]

Cristina M. Tere
6151 Orange Street, LA, 90048

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A24

Christine Neel
6151 Orange Street
Los Angeles, CA  90048

Response to Letter No. 21 A24

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A25

Signature is illegible
6151 Orange Street
Los Angeles, CA  90048

Response to Letter No. 21 A25

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Selling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

We are deeply concerned with the following issues:

- ✔ Traffic and Transportation
- ✔ Noise and Vibration Levels
- ✔ Aesthetics, Views and Obstructions
- ☐ Winter Shade/Shadows
- ✔ LEED Construction Practices
- ✔ Availability of Public Resources (Fire, Police, Parks & Recreation, Libraries)

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

[Signature]

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A26

Jane Robertson

Response to Letter No. 21 A26

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

We are a group of residents who reside in the immediate area of the proposed Wilshire Crescent Project. As residents of this community we would like to voice our opposition to this project.

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☐ Traffic and Transportation
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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

[Signature]

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A27

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A27

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Seiling and Community Council Members:

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

Elda Sma Maghjou

# 109

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A28

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A28

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council  
543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

Dear Mr. Selling and Community Council Members:

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

Judith Brooks

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A29

Judith Brooks

Response to Letter No. 21 A29

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

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Sincerely,

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A30

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A30

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

RE: EIR #ENV-2008-0729-EIR

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Sincerely,

[Signature]

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A31

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A31

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
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Sincerely,

[Signature]

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A32

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A32

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

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Sincerely,

[Signature]

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A33

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A33

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.
20 September 2009

Mid City West Community Council
543 N. Fairfax Avenue, Suite 106
Los Angeles, CA 90036

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We ask that the Mid City West Community Council support us in opposing this proposed development.

Sincerely,

[Signature]

Concerned Resident Opposing the Wilshire Crescent Project
LETTER NO. 21 A34

Signature is illegible and no contact information is provided.

Response to Letter No. 21 A34

This letter is a signed form letter. For responses to the comments made in this form letter, please see Comment Letter 21 A1, responses to comments 21 A1-1 through 21 A1-3.