

Project 8150 Sunset Boulevard

April 25, 2014

TRACKING # 2014011087

(The italicized portions are direct quotes from the Project 8150 Application)

Dear Honorable Senators, Assemblypersons, and the J.L.B. Committee,

Kindly Look at this Project 8150 Sunset Boulevard application as well as the ARB report closely, and you will see that both make very little sense. The statistics that are used are bogus; the ARB report seems to purport that the new development will produce less pollution than the tiny, “mom-and-pop” business establishments that are there now generate.

Someone in Sacramento has really dropped the ball here. Is what happens when “politicos” on the state level feel they know more than the municipal governments and the local residents in deciding the future of their own community?

And why if you wish to perpetrate the myth that we live under a democratic form of government wherein our elected officials are paid for by our hard-earned tax dollars; do you allow these very officials to, not only act as if we don’t exist, but further enrage us by taking our rights away for examining and/or protesting the undeserving builders of this project.

Not only have the Townscape people behaved in a non-transparent fashion; when many of us spoke to them to attempt to present a community viewpoint, they refused to listen. As landlords, they used flagrantly bullying methods to coerce the tenants to give up their leases when the tenants wanted to continue operating their businesses under the legal terms of their leases. One of the tenants came to our Save Sunset Boulevard meeting and explained that Townscape refused to give them an address to which they should send their rent checks, so it would

appear that they were in default. Townscape put up parking arms at the entrances to the mall, charging egregiously inflated prices so the tenants lost customers. These parking arms were later proven in court to be illegal; and Townscape was ordered to take them down, but the damage to these small businesses was irreparable.

It's disheartening to communities when the political system rewards the moneyed elements and their lobbyists to override the hard-working citizens who pay your salaries to serve them; and, instead, receive short shrift because the governor has bought into a pack of lies.

I've had conversations with both Tom LaBonge our city council member and Michael LoGrande, head of the Los Angeles Department of Planning both of whom have stated that the project is too large and out of scale for the neighborhood. Jonathan Brand, Chief of Land use Planning, North in LaBonge's office stated, "We've told those guys they have to come back with a smaller plan."

Furthermore, this "High-density" ratio that Mayor Garcetti has been erroneously touting as the future for Los Angeles – Hollywood, in particular – has been struck down in court, because actuarial science shows that the populations of both Los Angeles and West Hollywood are on the decline; and if the city (and state) believe that urbanites are going to put up with crammed-in quarters, paying parking valets on a daily basis, untenable traffic, deficient Metro Transportation, and, finally, resorting to bicycles, you are all wrong. People will move out of L.A., and our tax revenues will decline even further. This city (and its street geography) are not equipped; nor can it afford, to build the transportation facilities to service its existing population – not to mention larger future populations.

Kindly read below.

The Report states:

“The Project’s open space would provide a new, 9,134-square-foot public space (“Corner Plaza”) at the northeast corner of the site (an area that is, and will continue to be, owned by the City, though the Applicant will be required to improve and maintain the area), a 34,050-square-foot central public plaza at the site interior (“Central Plaza”), public rooftop deck/garden areas.

RESPONSE: The corner plaza, which belongs to the citizens of Los Angeles, and which has been illegally usurped for the purposes of this plan includes a right-turn lane to increase the flow of traffic to the South on Crescent Heights Boulevard in the heavily congested intersection. In usurping this corner triangle, Townscape has neglected to inform you that the traffic turning right will be forced to turn back on itself, because there is no longer a facilitating right-turn lane in their plan. They’ve taken it away; so, the traffic flow will be even slower, if that’s possible, and heavily and negatively impacted as Sunset Boulevard is quite narrow at that point with no hope of widening even by inches. Furthermore, Townscape has taken away one of the few bus stops in the area which is currently situated on this triangle island.

Furthermore, the mention of “public rooftop deck” will bring noise pollution to the neighborhoods surrounding the complex; and when we asked the Townscape leadership in a public forum if they would limit the rooftop areas to daytime use and restaurant use and NOT NIGHT CLUB activities, they refused to do so.

The Report states:

“Siting, Transportation, and Mixed Use addresses preservation of undeveloped property by encouraging infill development, facilitating pedestrian activity by integrating a diversity of uses and providing convenient access to public transportation. 8150 Sunset Boulevard is located in a prime urban location close to transit, entertainment and employment and will integrate a range of commercial, retail and residential spaces arranged around

public and private open spaces. The Project's placement of residential units on the main commute arterial of Laurel Canyon increases efficiencies to the siting and transportation in the area. Additionally, the Project will provide short- and long-term bicycle parking and showers for bicycle commuters to facilitate "last mile" connectivity to transit options."

RESPONSE: If the bicycle ride is supposed to be so easy and attractive to shoppers, commuters, etc., why on earth will they need to take showers?! How are riders going to carry all their work gear – computers, clothes, sundries, make-up, purses, etc. on a bicycle up those steep hills?!?!? And WHAT TRANSIT OPTIONS are we talking about?! Two small bus stops within the two-block area, one of which is being taken away?

The Report states:

"Building Performance emphasizes water and energy efficiency to maximize livability with reduced resource consumption. Consideration will be taken to select high-performance materials, fixtures and appliances to reduce energy and water consumption by 20% from the regional usage baseline. Additionally, a construction and demolition waste management plan will maximize recycling."

RESPONSE: Waste management is a substantial issue that your committee needs to "vet" with the city of West Hollywood as ALL the sewage from the construction as well as from the commercial establishments, apartment units and condominiums will flush into the sorely-taxed West Hollywood sewer system. This is a point that the West Hollywood City Council brought up in its letter of concern to the City of Los Angeles. (Kindly see the attached email).

The Report states:

"MTA bus stops front the subject site and service Metro Lines 2/302 along Sunset Boulevard and Metro Line 218 along Laurel Canyon and Sunset Boulevards. Metro Line 217 and Metro

Rapid Bus Line 780 operate along Fairfax Avenue with a bus stop approximately 1,560 feet from the subject site. Additional bus lines in the area run along La Brea Avenue and Santa Monica Boulevard. Ridership along these four bus lines have been estimated to total well over 11 millions trips in 2013³.”

RESPONSE: The bus lines that operate along Fairfax Avenue are all beyond the 1,500 foot zone (which by the way Townscape is trying to use as a statistic to achieve a 3 to 1 FAR ratio when the city’s code ratio is 1 to 1; but the distances are too far! Also, La Brea Avenue is more than one mile away from the 8150 site, so it hardly qualifies as a metric for any Ridership statistic that impacts the site. Santa Monica Boulevard is also a long walk, over ½ a mile (six/tenths to be exact) which is 3,168 feet, which doesn’t qualify the site for a FAR variance, not to mention that the walk to Santa Monica Boulevard is steep downhill and a steep uphill to return.

The Report states:

“As a result, the Project’s commercial components will exhibit substantial “pass-by” patronage with commuters taking advantage of convenient services and shops provided by the Project during already-existing trips past the Project site, thereby reducing the amount of “new” project-related traffic added to the existing roadway network in the area.”

RESPONSE: First of all there is not even a possibility of “new” project-related traffic.” The traffic flowing north on Crescent Heights bottlenecks so badly at the Sunset Boulevard intersection already, the gridlock it causes blocks the East West traffic flow backing it up up far past both Fairfax Avenue to the east and over a mile and a half to Doheny Drive to the West.

The commuters who make the drive in any direction to or from – or simply passing - this intersection are so road-weary after working all day and adding another hour of driving in bumper-to-bumper traffic - the LAST thing they’re going to do is lose their place in the line of traffic to stop and shop at 8150. Many are

friends, and I've asked them this question. They just want to get home!

The traffic is so dense that one of our group almost died of a heart attack because an ambulance couldn't get to his house in time; and he lives just one-half a block away from Sunset Boulevard. Emergency fire and police units are very concerned about the traffic density already, and this huge project is only going to add massive amounts of cars to an already overly-taxed intersection.

Furthermore, there is a notable, historic mid-century building that deserves preservation on the site called the LYTTON CENTER. The Los Angeles Conservancy just awarded the LYTTON CENTER architect Kurt Meyer its Modern Masters Award in December 2013.

To quote the **WEHOville** article by Dan Watson, from Thursday 9/26/2013,

“Concerned Residents Sound Off on Townscape Partners’ 8150 Sunset Blvd. Project”

“The proposed project would demolish the Chase Bank building, which the Los Angeles Conservancy considers historic. The building was formerly Lytton Center, a 1960 modern bank building distinguished by its zigzag folded plate roof.

“With its dramatic, folded plate concrete roof and glass-walled banking floor, the former Lytton Center was a striking departure from traditional bank design when it opened in 1960,” according to the Conservancy. “As financial institutions nationwide analyzed the need for progressive banking methods following World War II, architects responded by radically reinventing the bank’s form. Lytton Center typified these national postwar banking trends through its modern architectural design, transparency, and integrated art component, and is one of Los Angeles’ earliest remaining examples of this

transformative shift in postwar-era bank design.”

“The conservancy believes the building might qualify for CEQA (California Environmental Quality Act) and that it needs to be analyzed,” Khalatian said. “The EIR will analyze the historic nature of the building and others in the area.”

Furthermore, this project abounds with CEQA issues:

- 1) Parking – With only 295 parking spaces (too many of which are for compact vehicles) for 249 residences; only 46 units will have parking for 2 cars. This is woefully inadequate for most households in L.A. that are made up of two working professionals, both of whom drive. With 554 parking spaces for commercial use, where are the hundreds of employees going to park who don't work in the commercial establishments or shop in them, but who work in the complex to service it, maintain it, guard it, etc.?
- 2) Besides sewage, waste removal, etc. that will over-utilize the West Hollywood sewer system, another problem is that of shade and shadowing. Dwellings that “live” in the permanent shadow of a large structure become permanent “dead zones;” fungus takes over, gardens and swimming pools are destroyed; life forms cease to exist in these dark shadowy basement-type environments. There needs to be an appropriate study on the surrounding apartment and condominium units, some of which are very high-end that will fall into the 8150 structural shadow.
- 3) EARTHQUAKE DANGER: Governor Brown purports to be a proponent of continuing the earthquake mapping that proved to be the final undoing of the Hollywood Millennium Project. Has he or anyone in his office taken a look at where 8150 is located? It's less than 100 feet from the Alquist-Priolo zone! And since we're all waiting for the state geologist team to finish mapping that fault; why don't we wait until the report comes out and an appropriate determination can be made for the safety of the public before racing ahead with granting a streamlined judicial

review. In the January, 2014 Los Angeles Times:

“Gov. Brown proposes sharp increase in earthquake fault mapping budget”

Further into the article, the State Senator for our district is even supportive of further fault exploration.

“State lawmakers have previously called for a boost in funding so the mapping can continue. In a letter last week to the state Senate president, Sen. Ted W. Lieu (D-Torrance) said that the state's budget situation has improved significantly in the last few years and fault mapping should fully funded immediately.

"It boggles my mind," Lieu said in an interview. "Every day across California, local planning departments are making decisions, and we need to make sure that no future buildings are going to be built on fault lines simply because a map wasn't updated."

Lieu's remarks came after The Times last month [reported that more than a dozen buildings](#) were approved for construction on or near the Hollywood and Santa Monica faults over the last decade without the rigorous studies that would have been required had the state zoned the two faults. Both faults are well known and capable of producing disastrous earthquakes.”

- 4) And where was the notification of the opening and closing of the Public Review Period posted? I am conversant with many people in many Los Angeles Councils, not to mention, the Save Sunset Boulevard group; and no one, to a person, had received any information that there was a Review process open to the public. No one who resides near 8150 Sunset Boulevard was notified of the Public review Period, and these are the very people whose neighborhood the governor is so willing to place in jeopardy from your unfamiliar vantage point in Sacramento.

In conclusion, please do not write a letter of concurrence for this disastrous project. Instead, at the very least, write a letter of non-concurrence so that the normal and less slippery wheels of the Los

Angeles and West Hollywood City Councils and communities can have the normal access to the means to represent the safety of their citizens on a somewhat even playing field.

Yours truly,

ALEXANDRA ROSE
PRESIDENT, SAVE SUNSET BOULEVARD
PRODUCER – CHAIR
Industry Initiatives and Special Projects
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Chapman University
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From: info@savesunsetboulevard.com [info@savesunsetboulevard.com]

Sent: Sunday, April 27, 2014 07:07 PM Pacific Standard Time

To: Ken Alex

Subject: PUBLIC OUTCRY AGAINST - Jobs and Economic Improvement Act (AB 900), Public Resources Code section 21184 - SCH Tracking Number 2014011087

Dear Mr Alex,

I am writing to you on behalf of our 501c, Save Sunset Boulevard, to protest the CEQA fast tracking that is about to be granted to the wholly undeserving building project under the Jobs and Economic Improvement Act (AB 900), Public Resources Code section 21184, SCH Tracking Number 2014011087, that has been forwarded to your committee.

I must emphasize in the strongest terms that this project should NOT be eligible for streamlined judicial review. This initiative is being abused by the developers to try and circumvent the concerns of both the city and the community. In this package I have added several letters to back this up, and the recent judicial ruling against high density development in Hollywood. Also I have included State Geologist John Parrish's latest earthquake map, which places the entire project within the fault safety zone.

I would also like to bring to your attention these CEQA issues that need further investigation, clarification, and transparency:

- 1.) The 500 plus residents, 311 employees and countless delivery trucks will generate over 5000 new vehicle movements a day, worsen the air quality and adding a massive amount of congestion to one of the busiest and most dangerous intersections in Hollywood.
- 2.) There is no mention or inclusion in the developers' plans for only 400 valet only parking for the 311 projected employees, 500 residents and the traffic that the restaurants, gyms and shops will generate. Parking in our community is already untenably overcrowded, and all these cars roving around looking for somewhere to park will massively add to the local congestion, noise pollution and emissions.
- 3.) The daily flow of traffic at Sunset Boulevard and Crescent Heights is currently at an untenable density, worrying the Los Angeles Fire Department and other emergency services that service the area. The intersection is already categorized by the as one of the most dangerous in the city.
- 4.) There is no way that the 900 bicycles they suggest parking for can work in an area with steeper hills than San Francisco and more traffic than New York.
- 5.) The site is over two miles from the nearest metro stop, and the traffic is so bad that what few busses there are, are slower than walking. The developers claim there are transportation hubs within a half-mile radius is absolutely false, the nearby bus stops are only serviced by a couple of lines. Their claim that there will be 10% greater efficiency in the number of vehicle trips per resident is not just untrue, it is laughable.

6.) The entire structure, which classified as 16 stories, but is actually 22 when one includes the parking levels, is massively out of scale, height, and density in relation to any other structure within a two mile radius.

7.) This building will destroy one historic building, and tower over a dozen more, including the iconic Chateau Marmont Hotel. It will completely destroy the heart of Hollywood's historic residential area, one of LA's great architectural treasure troves.

8.) The site is dangerously close to the earthquake fault line known as the Alquist-Priolo Zone, which runs under Sunset/La Cienega Boulevards. Since the California Geological Survey is updating their map, due out in July of 2014, it is imperative that that information be included in any determination regarding constructing such a large structure so close to a fault line.

9.) The developer, (Townscape LLC) have shown themselves to be abusive in their harassment of the existing tenants in the complex as Townscape placed undue pressure on these merchants by unilaterally imposing non-contractual parking arms, costing patrons exorbitant sums to enter the shopping area – these were proven illegal in court, and Townscape was required to remove them, but the damage to the merchants' clientele was already done.

This email is also coming to you with supporting documents via USPS Priority Mail (tracking # 9405 9036 9930 0173 6190 99) In it you will find public letters of concern that were entered into the city records for the EIR. from our council member Tom Le Bonge, the West Hollywood Preservation Alliance, John Parish's latest earthquake map, with a PDF showing the location of the proposed tower by the fault, images showing its impact on the historic neighborhood, and also the court documents giving Judge Goodman's finding and conclusions on the flawed Hollywood Density Plan that allowed this monster to ever even be considered. All of those documents can also be accessed here to download -

<https://www.dropbox.com/sh/99lk4x46nz0gup9/CwNbmV4b5D>

Please make a note of these objections, and the other letters I have included that support our position that this building is wholly unsuitable, out of scale, and should not be allowed to skirt the normal workings of the city and the law to limit its size and impact on historic Hollywood.

Please confirm your receipt of this, and that it has been duly entered into the record

Thank you, yours sincerely,

Andrew Macpherson
Treasurer
Save Sunset Boulevard Inc

Dear Ms. Srimal,

As a concerned citizen in the West Hollywood Hills of Los Angeles (zipcode90069), I can only “say” that this proposed development is vastly lacking in its details, its renderings are sketchy, to put it mildly; and there is absolutely ZERO assessment – which reads – concerns about the adjoining neighborhood, which has height restrictions and many buildings and homes of historic value.

Some examples of insufficient details are as follows:
The COMMERCIAL ELEVATOR seems to be only one in number; which means it’s challenging for apartment dwellers to move furniture or shoppers to come up from the parking lot.

The rooftop level uses are not adequately detailed, and when I questioned both the builder and his representative, neither would say what was really going to be developed on the roof? There are no covenants in the plan against noisy clubs, which would echo throughout the entire area, and there is no description of the indoor/outdoor space. There is a great deal of danger in including a rooftop venue, as both people and “things” could fall over the edge.

The question of a dangerous earthquake fault running under the property seems not to bother anyone; yet, we, the residents want to see at least THREE highly credentialed geologists give the project their UNQUALIFIED SAFETY STAMP.

The article in the Sunday Los Angeles Times describing how LAX the city has been regarding repairing concrete buildings that have been assessed as earthquake dangers is shocking and bespeaks a City Hall and its’ Council Members who are more interested in receiving donations than caring about the safety of their constituents.

Furthermore, the ADVERTISED height of the project is 16 stories; when in fact, in real numbers, it's 22 stories. Again, this demonstrates the wanton carelessness the builders feel they have to demonstrate to the community. One can only hope the Planning Department will function in a more truthful, UNAGENDAED, manner.

THE PLAN is sorely lacking in details of the exterior wall material(s) of the parking garage, making it impossible to understand the impact of the parking garage and its internal circulation, on neighboring properties. For example, THE GRANVILLE was bludgeoned so hard by the underground parking structure of the CRUNCH GYM/TRADER JOE'S next door (during an earthquake – '92, I believe), that the Mall on the South East side of Sunset and Crescent Heights, was forced to pay the Granville \$15 million in damages. Specifically, what are the exterior walls made of? And, how are they going to be lit and vented.

THE PLAN is missing information on the South side of the property, which will affect residents who live along that perimeter.

The number of parking spaces is woefully small. Even if an apartment is a single, there are going to be two people living in it? Where is the second person going to park? There is VIRTUALLY ZERO parking in the area surrounding the proposed structure.

Furthermore, I see no parking spaces allocated to the 50 – 75 employees who are going to be working there on a daily basis both in the stores, maintenance, security, parking, etc., etc. Again, there is ZERO extra parking in the surrounding streets.

We also weren't informed as to HOW MANY valet parkers; security people, trash collection people, etc. will be working on a daily/weekly basis.

And the HELIPAD! That's a verbal discussion item that doesn't seem to be reflected on the plans, either.

The traffic is already SO DENSE in the intersection, it's impossible to get through Crescent Heights/Laurel Canyon coming from the East, driving West now during RUSH HOUR, because the North/South Laurel Canyon drivers hang over into the intersection, causing gridlock.

We have no information as to how trucks will even be able to enter the structure, as many trucks will be needed to service the volume of what is being proposed. Again, large semis have HUGE CHALLENGES on Sunset Blvd; and, in fact, are rarely allowed – sometimes only at hours that will most assuredly wake residents; and when they do SERVICE Trader Joe's or Bristol Farms (two grocery stores right across the street) they tie up traffic for a very long time.

What types of signs and lights will be on the structure? Will there be billboards, bright, flashing neon signs – there's no details provided in this regard, either.

There is no information provided as to HOW LATE establishments will be allowed to stay open, disturbing the neighbors, either.

This neighborhood is NOT HIGHLY URBANIZED. Downtown L.A. is highly urbanized; Westwood is highly urbanized. This description, again, reflects the agendas of the builders (and perhaps the city) to disregard the life-style this neighborhood has always enjoyed. People live here

because they DON'T want a highly urbanized lifestyle. The streets are TINY, NARROW, HILLY, and WINDING; and if myriads of cars from Sunset Blvd and Crescent Heights suddenly start using the small streets as short cuts, the neighborhood will be ruined. Housing values will plummet; and the city's tax base from houses will be negatively impacted.

There are only two bus lines – sporadic at best – that service this area; how are the buses going to be able to traverse such a densely trafficked area. The buses already can barely get through.

There needs to be a study implemented that includes the impact from the 8150 project, in conjunction with the large residential edifice planned on the corner of Sunset and Olive as well as the large hotel planned, which will include the Petersen Building on La Cienega and the old Tiffany Theatre on Sunset. There is also discussion of a new Marriott on the corner of Sunset and Doheny.

There is no question that the impossibly dense influx of additional traffic on Laurel Canyon will send drivers to ALL THE OTHER CANYONS east and west of Laurel. Has anyone counted cars in all these canyons and then added the new influx?

With the closures Sunset Blvd. experiences now due to parades, premieres, and special events on Hollywood Blvd. and Santa Monica Blvd. (and often Sunset Blvd., itself) it's challenging to imagine how the community is going to survive 2 ½ years of construction blockages, noise, dust, a substantial number of construction workers (not to mention their vehicles). That kind of turmoil will knock the business out from the Chateau Marmont and possibly The Standard

hotels. Visitors are not going to want to pay for a tranquil room at the Chateau Marmont when the experience will be anything but. I doubt that the Chateau Marmont could sustain the losses that would be generated during a 2 ½ year period of construction.

There are no indications as to how traffic on Sunset Blvd. would be helped by this proposed structure; and they've admitted there will be no traffic mitigation on Sunset Blvd.; however, the plan to somehow block-off Havenhurst would only increase difficulty of access for that entire street of residences, not to mention that Havenhurst is a free-flowing north south street now, and to arrest the flow of traffic only builds up congestion on nearby neighborhood streets, which are already congested.

Furthermore, the plan appropriates a pedestrian crossing triangle (a traffic island) and right turn lane as if the builders are offering the citizens something when that triangle already belongs to the city of Los Angeles – i.e., the citizens.

Entrance and egress to and from the garage/parking area are ill-planned and appear to cause additional, unsafe traffic conditions – again, adding so much congestion to the two boulevards – currently overloaded and insufficient to bear existing traffic. These need to be examined closely.

Trucks unloading fresh produce often never turn off their engines when at a loading dock. The loading area in the plan seems insufficient to handle more than one or two trucks at a time; and since most trucks need to unload by a designated time, one questions how many trucks are going to be sitting in line waiting to unload on any given morning. And what will the hours of delivery allowed?

The plan does not specify the exact material the exterior of the building will be made of. The Planning Department would be well served to look at the effect of reflective glare that might occur on neighboring buildings.

The proposed area supposedly consecrated as a pedestrian area/walkway/etc. space is also not well defined or described. Not too many neighbors are going to walk up a rather steep hill from Santa Monica Blvd. or Fountain Ave. to shop – particularly, if they're going to be returning home with heavy packages.

There is an apartment nearby on Havenhurst that houses the disabled and elderly. What plans do the builders for see to make sure the residents of this “home” are comfortable and not endangered health wise due to the construction.

There are numerous homes, particularly on the North side of Sunset Boulevard that have been built as far back as the turn of the century – and certainly in the 1920's and 1930's. The owners of these residences have invested heavily in their restoration, and to destroy the charm and history of the surrounding areas with an unattractive high-rise that does not suit the area is wrong. The neighborhood also boasts historic commercial buildings that bespeak certain financial values because they ARE historic magnets for tourists.

Addressing the above issue is important on several fronts: 1) Will the value of the businesses of historic significance decrease? Will tourism continue to flourish if Sunset Blvd. turns into Westwood – a mass of unappealing high-rises that could exist in any American city? And, what about the residents whose homes delight in magnificent views overlooking the city? The value of these homes will decrease immeasurably when blocked by a giant high-rise.

Furthermore, we have scene a distinct lack of co-ordination between the West Hollywood City Hall and the Sheriff's Dept. with their Los Angeles counterparts, and this site is just on the border between the two cities. Criminal perpetrators know they just have to step over a close line to avoid pursuit and prosecution.

Our neighborhood residents are extremely concerned that the City Of Los Angeles is on the path to yet another disastrous, ill-planned, and unsupervised building project under the aegis of developers who care not one whit or the neighbors concerns. Nor are they or the city bothered that a giant earthquake fault runs below Sunset Blvd. at the base of the hills; nor, has the building group been forthcoming in its presentation of its plan.

We can only hope that SOMEONE in the Planning Department will look closely at the proposal and examine it thoroughly, honestly, and without personal agenda.

I thank you for your consideration of our concerns.

Alexandra Rose
PRODUCER and PROFESSOR
CHAIR, Industry Initiatives and Special Projects
THE DODGE COLLEGE OF FILM AND MEDIA ARTS
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**COMMUNITY
DEVELOPMENT
DEPARTMENT**

October 14, 2013

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

RE: Notice of Preparation of a Draft Environmental Impact Report
8150 Sunset Boulevard Mixed-Use Project
Case Number: ENV-2013-2552-EIR

Dear Ms. Hewawitharana:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Draft Environmental Impact Report (DEIR) for the 8150 Sunset Boulevard Mixed-Use Project (Project). Included in this letter is a list of issues the City of West Hollywood would like studied in the DEIR that is to be completed for the Project.

ANALYSIS REQUESTED

Due to the Project's close proximity to the City boundary, there is a potential that the City of West Hollywood and its residents could experience negative impacts both during the construction of the Project and as a result of operation thereafter. The Project has a potential to create negative impacts and therefore the City of West Hollywood requests that the potential for any environmental impact, including the following specific issues, be studied in the DEIR:

TRAFFIC

Due to the Project's vicinity to the City of West Hollywood, the following intersections are requested to be studied as part of the DEIR traffic analysis:

1. Sunset Blvd. & Harper Ave.
2. Sunset Blvd. & Sweetzer Ave.
3. Sunset Blvd. & La Cienega Blvd.
4. Fountain Ave. & Fairfax Ave.
5. Fountain Ave. & Crescent Heights Blvd.
6. Fountain Ave. & Havenhurst Dr.
7. Fountain Ave. & Sweetzer Ave.





8. Fountain Ave. & La Cienega Blvd.
9. Santa Monica Blvd. & Fairfax Ave.
10. Santa Monica Blvd. & Crescent Heights Blvd.

In addition to the intersections listed above, please also study the residential street segment of Havenhurst Drive between Sunset Boulevard and Fountain Avenue.

As part of the study, consider traffic generated by cumulative projects located within the City of West Hollywood. The list of projects is available upon request.

For all study locations within the City of West Hollywood, please use the City of West Hollywood's adopted level of service methodologies and significant impact criteria when assessing potential traffic impacts. Please contact the City's Transportation Planner, Bob Cheung, at (323) 848-6346 for the methodology and thresholds of significant impact criteria.

INFRASTRUCTURE

The Project is located just to the north of the City of West Hollywood boundary at Crescent Heights Boulevard and Havenhurst Avenue. The City of West Hollywood owns and operates 8-inch diameter sewer lines which convey flows from north to south in both of these streets. The Project will have sewer flow which will discharge into both of these City of West Hollywood sewers.

The Project may generate a net increase of sewage flow into the City of West Hollywood sewers. Therefore, the City of West Hollywood requests a sewer capacity study be conducted to evaluate the impacts to the downstream City of West Hollywood sewers, and include all necessary mitigation measures to ensure our sewer system is protected.

Also, if the Project uses a large portion of the available capacity of the City of West Hollywood sewers, then it could potentially preclude any future development within the City of West Hollywood from being able to discharge flows into these sewers. If the capacity of the City of West Hollywood sewers is impacted, relief sewers or larger pipes need to be installed to provide additional capacity for the City of West Hollywood sewer system.

Here is a link to West Hollywood's guideline packet for preparation of a sewer capacity study:

<http://www.weho.org/Modules/ShowDocument.aspx?documentid=2320>



Please use this as a starting point to put together a scope of work for the DEIR sewer capacity study.

CULTURAL RESOURCES

Eight (8) designated Cultural Resources and one Thematic District located in the City of West Hollywood are within a quarter-mile radius of the project site. Due to the Project's proximity to these historic resources, we request that the Project's potential impacts on these resources be studied as part of the DEIR.

NOISE

The Project may generate a substantial permanent increase in ambient noise levels in the project vicinity due to project-related traffic, truck loading and unloading for businesses within the Project, and HVAC systems. The proposed outdoor dining above the ground floor, and the rooftop restaurant use, may also contribute to a permanent ambient noise level increase which may negatively impact surrounding properties within the City of West Hollywood. Thus, we request that these potential noise impacts be studied as part of the DEIR.

LIGHT, GLARE, AND SHADE

The Project includes buildings that will be up to 16-stories tall (approximately 216 feet in height), introduces new building surface materials to the site, and includes nighttime illumination which may cause light, glare, and shade impacts on surrounding properties within the City of West Hollywood. We request that these issues be studied as part of the DEIR.

SEISMIC

The Project is located within close proximity to the active Hollywood Fault. Given the increased level of ground shaking in areas near active faults, we request that all geology, soils, and building design requirements related to seismic activity be studied as part of the DEIR to ensure the protection of public safety.

CONSTRUCTION IMPACTS

All potential construction related impacts for the proposed project should be studied in detail, and mitigation measures should be proposed when applicable. This includes, but is not limited to, all of the following:

1. Heavy haul routing
2. Haul frequency



3. Truck size
4. Hours of construction
5. Street closures
6. Location of construction ramps and driveways
7. Construction parking supply (Note: No construction parking will be allowed within the City of West Hollywood)
8. Construction Noise
9. Project Duration
10. Dust control and truck wheel washing practice
11. Pavement quality control
12. Any other construction related issues and information that could impact City of West Hollywood neighborhoods

If any construction related haul route passes through the City of West Hollywood, dust control for construction traffic needs to be addressed. We request that the DEIR specify the mitigation measures for this issue.

PUBLIC NOTICE

Thank you again for this opportunity to provide input on the environmental review of this project. Please list me as primary contact for the City of West Hollywood, and place my name on the list of interested parties to receive copies of all notices issued regarding the Project. Please also provide a copy of any notice of determination that may be filed with respect to the Project, pursuant to the provisions of Public Resources Code Section 21197 (f).

If you have any questions regarding this letter, please feel free to contact me.

Best Regards,

Scott Lunceford, AICP
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