



CITY OF LOS ANGELES  
DEPARTMENT OF CITY PLANNING  
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

# Errata to the Sustainable Communities Environmental Assessment

## 11905 Wilshire Boulevard Project

Case Numbers:  
DIR-2022-6249-DB-CDO-SPR-WDI-HCA  
ENV-2022-6250-SCEA

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**Project Location:** 11903, 11905, 11907, 11911, 11913 W. Wilshire Boulevard,  
Los Angeles, CA, 90025

**Community Plan Area:** Brentwood – Pacific Palisades

**Council District:** 11 – Traci Park

This Errata addresses minor modifications to the to the proposed project that were made in response to the evolution of the project design from initial stages to the construction plan drawings and incorporates responses to comments on the SCEA during the 30 day public review period beginning on July 20, 2023 and ending on August 21, 2023. The changes to the Project Description are noted in double underline text for additions and ~~strikeout text~~ for deletions.

**Project Description:** The proposed project includes the demolition of a one-story commercial building and site clearing of the surface parking areas for the construction of a ~~66,466~~ 67,232 square foot mixed-use residential and commercial project with 81 dwelling units, ~~3,047~~ 3,078 square feet of retail space, and ~~974~~ 891 square feet of restaurant space. The resulting floor area ratio is ~~2.94:1~~ 3.0:1. The project proposes seven-stories and a maximum height of ~~83' - 9~~ 89 - 9" above grade with one level of subterranean parking. The unit mix would include 23 studio units, 39 one-bedroom units, and 19 two-bedroom units of varying sizes and configurations. Of the 81 dwelling units, 15 percent of the base density (9 units) would be reserved at the "Very Low Income" level. Vehicular access to the proposed building would be provided by two full-access driveways via Westgate Avenue and the adjacent alleyway. The project would provide a total of ~~405~~ 106 vehicle parking spaces and ~~460~~ 132 bicycle parking spaces. Approximately ~~40,402~~ 8,755 square feet of open space and amenity areas would be provided. The proposed project will also include ~~22~~ 21 on-site trees. In consultation with the City of Los Angeles Department of Public Works, Urban Forestry Division, the Applicant will plant 2 new street trees on Westgate Avenue, 2 new street trees on Wilshire Boulevard, and retain one existing street tree on Westgate Avenue in place.

**PREPARED FOR:**  
The City of Los Angeles  
Department of City  
Planning

**PREPARED BY:**  
Parker Environmental  
Consultants, LLC

**APPLICANT:**  
Radha MFH CAL, LLC

**December 2023**

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## 1. INTRODUCTION

This Erratum includes clarifications and minor modifications to the Sustainable Communities Environmental Assessment (SCEA) (ENV-2022-6250-SCEA) prepared for the 11905 Wilshire Project (“Proposed Project”), dated July 2023. Pursuant to Public Resources Code Section 21155.2(b)3 and Cal. Code of Regulations Title 14, Section 15087 (the Guidelines for the California Environmental Quality Act) the SCEA was published for a 30 day public review period beginning on July 20, 2023 and ending on August 21, 2023. After publication of the SCEA, minor modifications have been proposed to the Project. The modifications and clarifications identified in this Errata clarify and refine the SCEA and provide supplemental information to the City decision-makers and the public. This Errata also includes responses to public comments that were received during the SCEA’s public review period.

CEQA Guidelines Section 15088.5(a) provides guidelines that would require the Lead Agency to recirculate the environmental document when new information is added after public notice is given for availability for review. New information added is not considered “significant” unless the environmental document is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the project’s proponents have declined to implement. CEQA Guidelines Sections 15088.5(b) and (e) provide additional guidelines which state that recirculation is not required where the new information added merely clarifies, amplifies or makes insignificant modifications in an adequate environmental document and provided that the decision to not recirculate is supported by substantial evidence in the administrative record. As demonstrated by the Errata, these minor corrections and clarifications do not represent significant new information as defined in CEQA Guidelines Section 15088.5(a). As such, this Errata does not require recirculation, consistent with CEQA Guidelines Section 15088.5(b).

## 2. Minor Modifications to the Proposed Project

The following provides a summary of the proposed project as it was proposed in the SCEA with proposed deletions shown in ~~strikeout text~~ and proposed modifications shown in double underline.

The Proposed Project includes the demolition of a one-story commercial building and site clearing of the surface parking areas for the construction of a ~~66,166~~ 67,232 square foot mixed-use residential and commercial project with 81 dwelling units, ~~3,047~~ 3,078 square feet of retail space, and ~~974~~ 891 square feet of restaurant space. The resulting floor area ratio is ~~2.94:1~~ 3.0:1. The project proposes seven-stories and a maximum height of ~~83’~~ 89 - 9’ above grade with one level of subterranean parking. The unit mix would include 23 studio units, 39 one-bedroom units, and 19 two-bedroom units of varying sizes and configurations. Of the 81 dwelling units, 15 percent of the base density (9 units) would be reserved at the “Very Low Income” level. Vehicular access to the proposed building would be provided by two full-access driveways via Westgate Avenue

and the adjacent alleyway. The project would provide a total of ~~405~~ 106 vehicle parking spaces and ~~460~~ 132 bicycle parking spaces. Approximately ~~40,402~~ 8,755 square feet of open space and amenity areas would be provided.

A summary of the proposed changes to the Proposed Project after the SCEA was published are presented below in Table 1.1, Summary of Project Modifications. In addition to the textual changes to the SCEA, Figures 2.6 through 2.20 have been revised to incorporate these changes. Figure 2.21 has been added to illustrate the proposed composite landscape plan with the locations of the proposed on-site and off-site trees.

**Table 2.1 Summary of Project Modifications**

<b>Project Land Use/Detail</b>	<b>Proposed Project (in SCEA)</b>	<b>Modified Project (in Errata)</b>	<b>Difference (SCEA vs. Modified)</b>
<b>Residential Dwelling Units</b>			
Studio	23	23	No Change
1 Bedroom	39	39	No Change
2-Bedroom	19	19	No Change
Total Dwelling Units	81	81	No Change
<i>Total Residential Floor Area</i>	<i>62,148</i>	<i>63,263</i>	<i>+1,115</i>
<b>Commercial Floor Area</b>			
Retail	3,047	3,078	+31 sf
Restaurant/Café, and Bar	971	891	-80 sf
<i>Total Commercial Floor Area</i>	<i>4,018</i>	<i>3,969</i>	<i>-49 sf</i>
<b>Total Floor Area</b>	66,166	67,232	+1,066
<b>Floor Area Ratio (FAR)</b>	2.9:1	3.0:1	0.1
<b>Open Space</b>	10,402	8,755	-1,647
<b>Building Height</b>	83' -9" (7 Stories)	89' 9" (7 Stories)	6' - 0" (0 stories)
<b>Vehicle Parking Spaces</b>			
Residential Parking Spaces	91	93	+2
Commercial Parking Spaces	14	13	-1
<i>Total Parking Spaces</i>	<i>105</i>	<i>106</i>	<i>+1</i>
<b>Bicycle Parking Spaces</b>			
Residential Bicycle Spaces	140	116	-24
Commercial Bicycle Spaces	20	16	-4
<i>Total Bicycle Spaces</i>	<i>160</i>	<i>132</i>	<i>-28</i>
<b>Trees</b>			
<i>On Site Trees</i>	22	21	-1
<i>Street Trees</i>	2 <i>(2 existing trees to remain in place)</i>	5 <i>(1 existing tree to remain plus 4 new street trees)</i>	+3
<i>Source: CarrierJohnson + Culture, October 23, 2023.</i>			

Figure 2.6: Site Plan (Revised)

Figure 2.7: Subterranean Parking Plan (Revised)

Figure 2.8: Level 1 Floor Plan (Revised)

Figure 2.9: Level 2 Floor Plan (Revised)

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Figure 2-18: West Concept Massing (Revised)

Figure 2.19: Northeast Concept Massing (Revised)

Figure 2.20: Southwest Concept Massing (Revised)

Figure 2.21: Composite Landscape Plan (Added)

### 3. Requested Permits and Approvals

The list below includes the anticipated requests for approval of the proposed project. The discretionary entitlements, reviews, permits and approvals required to implement the Proposed Project include, but are not necessarily limited to, the items listed below. The changes to the requested permits and approvals are noted in double underline text for additions and ~~strikeout text~~ for deletions.

1. Pursuant to Los Angeles Municipal Code (LAMC) Section 12.22.A.25.g.3, the Applicant proposes 15% of the base total units for “Very Low Income” and requests the following Density Bonus On Menu incentives:
  - a) Pursuant to LAMC Section 12.22.A.25.g.2, a 20% side setback reduction to the interior side yard;
  - b) Pursuant to LAMC Section 12.22.A.25.g.2, a FAR increase from 1.5:1 to 2.94:1 3.0:1;
  - c) Pursuant to LAMC Section 12.22.A.25.g.2, an increase of height from 75 feet (6 stories) to ~~83'-9"~~ 89' -9" (7 stories);
2. Pursuant to LAMC Section 16.05, a Site Plan Review for a project which creates, or results in an increase of 50 or more dwelling units.
3. Pursuant to LAMC Section 13.08, a Major Project approval for a project within the West Wilshire Community Design Overlay (CDO).
4. Pursuant to LAMC Section 12.37, a Waiver of Dedication and Improvements for relief from the five foot dedication on Wilshire Boulevard and to maintain the existing street dimensions. The Applicant is also requesting relief from the 20-foot radius corner cut dedication on the corner of Wilshire Boulevard and Westgate Avenue to the 2nd floor and above. The first floor will meet the corner dedication requirements.

Pursuant to various sections of the LAMC, the Applicant will request administrative approvals and permits from the Building and Safety Department and other municipal agencies for project construction actions, including but not limited to the following: demolition, excavation, shoring, grading, foundation, building, haul route, street tree removal, and tenant improvements.

#### **4. Minor Modifications to the SCEA Environmental Analysis**

The following provides an analysis of how the proposed modifications to the project would change or alter the findings of the environmental analysis as presented in the SCEA. As shown below, the proposed modifications would result in minor technical corrections to the description of the project but would not result in new substantial information that would alter the environmental findings or trigger the need to require new mitigation measures to address significant environmental impacts.

##### ***Floor Area***

Under the proposed revisions, the proposed total floor area of the project would increase by 1,066 (2% increase), resulting in a slightly increased total FAR (from 2.91:1 to 3.0:1). This increase in developed floor area would occur within the common lobby and circulation areas of the building and would not result in any increase to the number of dwelling units, the size of dwelling units, or to the commercial floor area. The commercial floor area would actually decrease with these modifications by 49 square feet overall. Because the changes proposed in the floor area would not affect the number of dwelling units or commercial floor area, which drives the impact analysis relative to energy use, air quality, greenhouse gasses, noise, trip generation, and utilities and public services, no additional environmental analysis is required.

##### ***Building Height***

The revised project would be a maximum of 89' – 6" above grade (7 stories), which is an increase of 6 feet as compared to the building height described in the SCEA. No changes to the number of stories are proposed. The building's height is evaluated in relation to consistency with the West Wilshire Boulevard Community Design Overlay and the Residential Citywide Design Guidelines and the project's On-Menu entitlement request related to increasing the allowable building height from 75 feet (6 Stories) to 89' - 9" (7 stories). As this request is a discretionary action identified as an on-menu incentive for providing 15 percent of the projects base density as Very Low Income affordable dwelling units, the approval of the height increase would conform to the LAMC and no further environmental analysis is required.

##### ***Parking***

###### ***Vehicle Parking***

The modifications to the proposed number of vehicle parking spaces would result in one additional parking space in the project and the reassignment of parking spaces to include two additional residential spaces and one fewer commercial parking space. Additionally, the code required parking calculations provided in Table 2.4 on page 2-31 of the SCEA, have been revised to address the change in commercial floor area and to be calculated in conformance with LAMC Sections 12.21.4(k) and 12.21.16(b), which provide that any fraction up to and including one-half may be disregarded and any fraction over one-half shall be construed as requiring one automobile

or bicycle parking space. The Applicant’s utilization of the bicycle parking replacement provision under LAMC Section 12.21.A.4 (to reduce the required residential vehicle parking with bicycle spaces) was also modified from 30% to 25% (i.e., 120 bicycle parking spaces in lieu of 30 vehicle parking spaces). As shown in the revised Table 3.1, below, the proposed project would be required to provide 89 residential parking spaces. The modified project would include 93 residential parking spaces and thus would be consistent with the LAMC.

With respect to the commercial parking, the modified project would reduce the size of the restaurant/café from 971 square feet to 891 square feet, thereby reducing the code required parking by 1 space (from 5 to 4 spaces). As shown in Table 1.2 below, the retail space would require 12 parking spaces, for a total of 16 commercial parking spaces (12 retail + 4 restaurant/café = 16 commercial spaces). With utilization of the bicycle parking replacement provision under LAMC Section 12.21.A.4 to reduce the required commercial parking spaces by 20% (-3 vehicle spaces), the project would require a total of 13 commercial vehicle spaces. The revised project would provide 13 commercial vehicle spaces. Therefore, the modified project would provide enough vehicle parking spaces to satisfy the code requirements for the proposed residential and commercial uses and no further environmental analysis is warranted.

**Table 3.1  
Summary of Required and Proposed Vehicle Parking Spaces**

Description	Quantity	Parking Required		Parking Provided
		Rate	Spaces	
<b>Proposed Residential <sup>a</sup></b>				
Studio Units	23 du	1.0 stall / du	23	-
One-bedroom Units	39 du	1.5 stalls / du	58 <sup>b</sup>	-
Two-bedroom Units	19 du	2.0 stalls / du	38	-
<b>Residential Parking Required:</b>			<b>119</b>	-
<i>25% Bike Parking Replacement <sup>c</sup>:</i>			<i>(-30)</i>	-
<b>Total Residential Parking Required:</b>			<b>89</b>	<b>93</b>
<b>Proposed Commercial <sup>d</sup></b>				
Retail	3,078 sf	1 stall / 250 sf	12	-
Small Restaurant	891 sf	1 stall / 200 sf	4 <sup>b</sup>	-
<b>Commercial Parking Required:</b>			<b>16</b>	-
<i>20% Bike Parking Replacement <sup>c</sup>:</i>			<i>(-3)</i>	-
<b>Total Commercial Parking Required:</b>			<b>13</b>	<b>13</b>
<b>NET TOTAL PARKING:</b>			<b>102</b>	<b>106</b>
<i>Notes: du = dwelling unit; sf = square feet</i> <sup>a</sup> Pursuant to LAMC 12.21.A.4(a). <sup>b</sup> Pursuant to LAMC Sections 12.21.4(k) and 12.21.16(b), any fraction up to and including one-half may be disregarded and any fraction over one-half shall be construed as requiring one automobile or bicycle parking space. <sup>c</sup> Pursuant to LAMC 12.21.A.4. <sup>d</sup> Pursuant to LAMC 12.21A.4(c)(4) and 12.21A.4(c)(5). Source: Carrierjohnson + culture, October 2023.				

## Bicycle Parking

The SCEA analysis noted that the proposed project would provide 160 bicycle parking spaces. 148 long-term bicycle parking spaces were located within a storage room on the ground-floor and 12 short-term bicycle spaces were located along Westgate Avenue (see Figure 2.8, Level 1 Floor Plan, of the published SCEA). Since the publication of the SCEA, the plan set has been revised to include a reduction to on-site bicycle parking spaces. The revised plan set, dated October 23, 2023, identifies a total of 132 bicycle parking spaces, including 120 long-term spaces and 12 short-term spaces. The location of these bicycle parking spaces will remain the same (120 long-term bicycle parking spaces located within a storage room on the ground-floor and 12 short-term bicycle spaces located along Westgate Avenue.) See Figure 2.8, Level 1 Floor Plan (Revised) of this Errata.

The bicycle parking requirements shown in Table 2.5, Summary of Required and Proposed Bicycle Parking Spaces, on page 2-32 of the SCEA, have been revised to address the change in commercial floor area, the adjustment to bicycle replacement spaces pursuant to LAMC Section 12.21(A)4, and to correct the vehicle and bicycle parking calculations pursuant to LAMC Sections 12.21.4(k) and 12.21.16(b), which provide that any fraction up to and including one-half may be disregarded and any fraction over one-half shall be construed as requiring one automobile or bicycle parking space. Table 2.5 on the SCEA is revised and replaced with Table 3.2 below.

**Table 3.2  
Summary of Required and Proposed Bicycle Parking Spaces (Revised)**

Description	Quantity	Parking Required		Total Spaces Required	Total Spaces Provided
		Short Term	Long Term		
<b>Residential (81 du)</b> <sup>a,b</sup>					
Units 1-25	25 du	3	25	28	-
Units 26-100	56 du	4	37	41	-
	<b>Subtotal</b>	<b>7</b>	<b>62</b>	<b>69</b>	<b>-</b>
<b>Commercial</b> <sup>c</sup>					
Retail	3,969 sf	2	2	4	
	<b>Subtotal</b>	<b>2</b>	<b>2</b>	<b>4</b>	
	<b>TOTAL:</b>	<b>9</b>	<b>64</b>	<b>73</b>	<b>132</b>
<p><i>Notes: du = dwelling unit; sf = square feet</i></p> <p><sup>a</sup> Pursuant to LAMC Table 12.21 A.16(a)(1)(i), short-term bicycle rates for residential uses are as follows: 1 space per 10 dwelling units for first 25 dwelling units; and 1 space per 15 dwelling units for dwelling units 26-100.</p> <p><sup>b</sup> Long-term bicycle rates for residential units are as follows: 1 space per dwelling unit for first 25 dwelling units; and 1 space per 1.5 dwelling units for dwelling units 26-100.</p> <p><sup>c</sup> Pursuant to LAMC Table 12.21A.16(a)(2), Commercial uses including retail shall provide both short- and long-term parking at a rate of one space per 2,000 sf.</p> <p>Source: Carrierjohnson + culture, October 2023.</p>					

As shown in Table 1.3, the proposed project would require 9 short term spaces and 64 long-term spaces for a total of 73 bicycle parking spaces. As discussed in the vehicle parking discussion above, the Applicant is seeking a reduction in vehicle parking spaces pursuant to LAMC Section 12.21.A(4), which would require 120 bicycle parking spaces in lieu of 30 residential vehicle spaces and 12 bicycle parking spaces in lieu of 3 commercial vehicle parking spaces. As such the amount of bicycle parking required to meet the code would be 132 spaces (120 spaces + 12 spaces = 132 spaces). The revised project proposed 132 bicycle parking spaces which would comply with the bicycle parking requirements of the LAMC, and no further analysis is warranted.

### ***Open Space***

As shown in Table 2.3 of the SCEA (Summary of required and Proposed Open Space Areas), the proposed project would require 8,375 square feet of open space. The modified project would result in an overall reduction in open space, from 10,402 square feet to 8,755 square feet. The open space requirements for the modified project would be the same as the proposed project as described in the SCEA. As such, although the modified project would reduce the amount of open space as described in the SCEA, the project would still satisfy the minimum open space requirements pursuant to LAMC Section 12.21.G.2. Therefore, no further analysis is required.

### ***Trees***

As noted on page 4-32 of the SCEA, vegetation on the project site was described as being limited to two street trees located along Westgate Avenue. As discussed in the SCEA, neither of the trees were proposed for removal as part of the proposed project. Subsequent to the SCEA being published, the Department of Urban Forestry removed one street tree that was identified on Westgate Avenue due to storm damage. In consultation with the Department of Urban Forestry the Applicant has agreed to replace the damaged tree that was removed and plant four new street trees; two on Westgate Avenue and two on Wilshire Boulevard. In total the modified project would provide 5 street trees (one existing and four new street trees). See Figure 2.21, Composite Landscape Plan (added).

With respect to on site trees, the proposed project would require 21 trees (1 tree per every four dwelling units). The project as described in the SCEA proposed 22 on-site trees. Under the proposed modified project, 21 on-site trees are proposed, which is one less tree than previously proposed. However, as the modified project will still comply with the LAMC code provisions for on-site trees, impacts would remain less than significant.

In conclusion, when accounting for on-site tree and street trees, the modified project would result in a total of 25 new trees, which is three more trees than previously proposed in the SCEA. The additional trees would result in a net beneficial impact upon the environment, as trees would provide beneficial impacts related to shade (reducing the heat island effect), aesthetics, and sequester greenhouse gasses. As such, no further analysis is warranted.

## 5. Responses to Comments on the SCEA

As discussed above, Pursuant to Public Resources Code Section 21155.2(b)3 and Cal. Code of Regulations Title 14, Section 15087 (the Guidelines for the California Environmental Quality Act) the SCEA was published for a 30 day public review period beginning on July 20, 2023 and ending on August 21, 2023. During the review period, the Lead Agency received comment letters from the following entities:

- Austrian Consulate General, Los Angeles
- Lauren Cole
- Bill Bujake

Provided herein are detailed responses to the comments included in these letters. The discussion below includes transcribed text from each comment letter, followed by detailed responses to each comment. Copies of the comment letters are included as Attachment A to this Errata. Based on a thorough review of these comments and the responses provided herein, the SCEA satisfies the legal requirements of CEQA, and no additional analysis or changes to the SCEA are warranted.

Pursuant to Public Resource Code (PRC) Section 21082.2 (b), “[t]he existence of public controversy over the environmental effects of a project shall not require preparation of an environmental impact report if there is no substantial evidence in light of the whole record before the lead agency that the project may have a significant effect on the environment.” Section 21082.2(c) also provides that “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.” As discussed in greater detail below, the issues raised in the comment letters do not provide substantial evidence to support a fair argument that a significant environmental impact is likely to occur.

## **COMMENT LETTERS**

### **COMMENT LETTER NO. 1**

Austrian Consulate General, Los Angeles  
11859 Wilshire Boulevard, Suite 501  
Los Angeles, CA 90025  
December 4, 2023

#### **COMMENT 1.1**

To Whom It May Concern

The Consulate General of Austria in Los Angeles wishes to express its deep concern regarding the ongoing issue of homeless individuals occupying the vacant building adjacent to our Consulate at the intersection of S Westgate Ave and Wilshire Blvd.

Over the past few weeks, there has been a significant increase in the number of homeless individuals frequenting this property. This has resulted in a heightened sense of insecurity, including among our staff members, one of whom was unfortunately chased by a homeless individual on November 28, 2023. Video footage documenting this incident is available.

In light of this incident and the escalating concerns for our staff's safety, the Consulate General of Austria strongly supports any measure alleviating the situation, including the demolition of the vacant building. Removing this potential harborage for homeless individuals could significantly reduce the risk of further incidents and restore a sense of safety to our workplace and surrounding neighborhood.

We have also reported this incident to the Department of State/Office of Foreign Missions and the Los Angeles Police Department.

We appreciate your attention to this urgent matter and look forward to your prompt action.

#### **RESPONSE TO COMMENT 1.1**

The commenter states their overall support for the Project but raises concerns with respect to adverse existing conditions associated with the vacant project site being an attractive nuisance for homeless individuals. This comment does not raise any specific CEQA issue pertaining to the proposed project or adequacy of the environmental analysis and, as such no response is required. Nevertheless, this comment will be forwarded to the City decisionmakers for their consideration.

The Applicant is aware of the current situation and has taken appropriate action to secure the site after repeated trespassing events. The Applicant has been actively working with the Los Angeles Police Department and Council Office 11 regarding these concerns and is working with the neighborhood groups to resolve any complaints expeditiously. It is anticipated that the attractive

nuisance will be removed after the project is approved and construction commences. As noted on page 4-4 of the SCEA, as part of the construction process, the Applicant would install temporary fencing around the perimeter of the project site for security purposes and to block views of the project site from the pedestrian level. Additionally, the active presence of contractors at the site on a daily basis will serve to detract unwanted trespassing and vandalism.

## COMMENT LETTER NO. 2

Lauren Cole  
Via email  
863 S. Gretna Green Way  
Los Angeles, CA 90049  
August 9, 2023

### COMMENT 2.1

I would like to submit comments on the final SCEA for 11905 Wilshire Blvd ENV-2022-6250-SCEA. I am submitting these as a resident of 863 S Gretna Green Way, Los Angeles, 90049 which is 0.4 miles away from this project in South Brentwood. My comments are:

1. **Applicant should provide a schematic of where 160 bike spaces can be located.** I understand that the Applicant is entitled to reduce its vehicle parking requirements by providing bicycle parking spaces. Unfortunately I have seen on other projects that sometimes commitments are made in order to get variances that they are not subsequently implemented. 160 is a very large number of bike spaces for an 81 unit building with some retail at street level, and in practice I can't imagine that even a fraction of them would ever be used if they are built. (If nothing else, at least some residents will choose to keep their bicycles in their apartments instead of in the shared bike parking.)

South Brentwood is a densely populated residential area of primarily multifamily homes that has a severe parking shortage, even though most buildings were constructed under previous parking requirements. I understand and support the desire to reduce reliance on vehicles and encourage bike riding (I am a cyclist myself), and I understand the City's mission of reducing vehicle parking to encourage transit use. However, the Applicant should not be able to get a reduction in the number of vehicle spaces based on a number of bike spaces that they later discover can't be implemented because of insufficient space.

I had requested a similar schematic on behalf of two local neighborhood groups for a nearby project, 11819 Wilshire, in 2018. That project was proposing 100 spaces of bicycle parking in lieu of vehicle parking in order to get variances. The Applicant was able to provide a schematic for 32 spaces in the public right of way (the renovated commercial-only building is currently advertising for new retail tenants but these bike racks have yet

to be installed). The Applicant never provided a schematic for a proposed 68 spaces in the garage.

I would like to request that the City require the Applicant to provide a schematic showing where these bicycle parking spaces can be located prior to approving the project based on this level of mitigation.

## RESPONSE TO COMMENT 2.1

The SCEA analysis noted that the proposed project would provide 160 bicycle parking spaces. 148 long-term bicycle parking spaces were located within a storage room on the ground-floor and 12 short-term bicycle spaces were located along Westgate Avenue (see Figure 2.8, Level 1 Floor Plan, of the published SCEA). Since the publication of the SCEA, the plan set has been revised to include a reduction in on-site bicycle parking spaces. As modified, the revised plan set, dated October 23, 2023, identifies a total of 132 bicycle parking spaces, including 120 long-term spaces and 12 short-term spaces. The location of these bicycle parking spaces will remain the same (120 long-term bicycle parking spaces located within a storage room on the ground-floor and 12 short-term bicycle spaces located along Westgate Avenue.) See Figure 2.8, Level 1 Floor Plan (Revised) of this Errata.

## COMMENT 2.2

2. **The City should require a higher percentage of at least 20% affordable units for this project (currently 15%, 9 out of 81 units).** Since the City has a goal of 20% affordable housing on all new construction (page 4-124), applying 20% to a building located in one of the most expensive multifamily areas of Los Angeles seems very achievable.

Nearby market rate rents on Wilshire Blvd. for new apartments are very high. Given that construction costs on the Westside are likely to be similar to the rest of Los Angeles, it seems like the higher revenue base from having 80% of the units at Brentwood's market rates should cover the building and maintenance costs that the City expects to be supported by average rental pricing in other areas.

Monthly rents for comparable nearby projects include:

- a. Landmark Apartments – 11750 Wilshire. \$5,000 to \$30,000 for Studio – 2 BR (555 – 2,097 sf) <https://www.apartments.com/the-landmark-los-angeles-los-angeles-ca/vq9hb8g/>
- b. Picasso Brentwood – 12027 -12035 Wilshire \$3,295 to \$4,195 for Studio – 1 BR (537 – 743 sf) <https://www.apartments.com/picasso-brentwood-los-angeles-ca/t5xw0n8/>
- c. 12026 Wilshire - \$2,400 to \$5,500 Wilshire, 1 – 3 BR (600 – 1800 SF) <https://www.trulia.com/building/12026-wilshire-blvd-los-angeles-ca-90025-1016276146>

Increasing the percentage of affordable housing will alleviate the neighborhood's concerns about a lack of vehicle parking. Although an objective of reducing vehicle ownership is good, households who are able to afford market rate rents for brand new apartments in Brentwood seem very likely to own vehicles (in spite of the City's goals. Renters in the building will simply park in the neighborhood if the 91 spaces reserved for residents (page 2-31, page 4-121 says 88 residential spaces) are occupied. Low Income/Very Low Income households seem much more likely to take advantage of the availability of mass transit on Wilshire Blvd and not own a car.

## RESPONSE TO COMMENT 2.2

The commenter states that the City should require a higher percentage of affordable housing units in projects. This comment is directed toward the City and is not a specific environmental issue related to the SCEA. However, for informational purposes, pursuant to LAMC Section 12.22.A.25.e, the number of development incentives correlates to the amount of Density Bonus On-Menu Incentives allocated to the Applicant. Those projects that provide a higher percentage of affordable housing are entitled to additional development incentives. As noted in the SCEA, the Applicant is providing 15% of the base total units for "Very Low Income" units and has received three On-Menu Incentives as a result.

## COMMENT 2.3

- 3. The Applicant should provide information on where 22 trees will be located in order to receive approval, and the project should adhere to the West Wilshire Community Design Overlay (CDO)'s requirements for street trees.** A proposed 22 trees (2-29) sounds terrific, but I question where these trees can be planted. All of the drawings of the project in the SCEA show fewer than ten trees (the number varies), and the Applicant is asking to reduce or eliminate set backs for the building.

The West Wilshire CDO calls for street trees every 30 feet on Wilshire Blvd. for any new construction (Standard 20) and the Applicant's comment that some of the 22 trees may be in the public right of way (2-29) implies that all of them could be inside the building in planters which is not consistent with the West Wilshire CDO.

The West Wilshire CDO was implemented some decades ago to improve pedestrian walkability through design elements and landscaping (page 2 of WWCDO). Since then, planting street trees has become an incredibly important way to combat climate change.

<https://www.nbclosangeles.com/investing/as-social-swelters-lack-of-trees-make-parts-of-la-even-hotter/3196245/>.

Given the importance of planting street trees, and the existence of the CDO specifically to make the area more attractive to encourage walking, this project must adhere to at least

the minimum standards of the CDO. If the project is getting variances due to mass transit access, it should support that goal by encouraging people to walk on Wilshire.

### **RESPONSE TO COMMENT 2.3**

The Project is required to provide one tree for every four dwelling units, pursuant to LAMC Section 12.21.G.2.a.3. As noted in Table 1.1, Summary of Project Modifications, above, the revised project will provide 21 trees on-site, including 19 trees on the Level 3 Podium Deck and two trees on the Level 7 Roof Deck (see Figure 2.21 of the SCEA Errata). Additionally, the Project would plant two new street trees along Wilshire Boulevard and two new street trees along Westgate Avenue, while also maintaining the existing street tree on Westgate Avenue. In coordination with the City of Los Angeles Division of Urban Forestry and LADOT, the Project is not permitted to provide any additional street trees along Wilshire Boulevard or Westgate Avenue other than the four trees being planted.

### **COMMENT 2.4**

- 4. The Applicant fails to include a proposed 23 story mixed use project two blocks away at 11701 Wilshire in its list of related projects when assessing cumulative impacts.** That project is DIR-2022-7013-TOC-CDO-SPR-VHCA. It was filed with LA City Planning on September 28, 2022. The Applicant reports related projects as of September 15, 2022 (page 2-36) so conveniently omits that project. However, given the less than two week difference in timing, and the scale of the 11701 Wilshire proposal --- 152 units, 66,902 sf office space, and 7,082 sf retail space, that project should be considered as a Related Project instead of allowing the Applicant to cherry pick dates in September.

### **RESPONSE TO COMMENT 2.4**

In preparation of the SCEA, LADOT Case Logging and Tracking System (CLATS) was accessed on September 15, 2022. (See SCEA Appendix I, Case Logging and Tracking System (CLATS), Related Projects, 11905 W. Wilshire Boulevard, Los Angeles, CA 90025, September 15, 2022). At that time, the project under Case No. DIR-2022-7013-TOC-CDO-SPR-VHCA had not been filed yet. As shown in the image below, the case was not filed until September 28, 2022.

Case Number:   Format: AA-YYYY-1234

**Case Number:** DIR-2022-7013-TOC-CDO-SPR-VHCA  
**Case Filed On:** 09/28/2022  
**Accepted For Review On:**  
**Assigned Date:** 08/14/2023  
**Staff Assigned:** Tamar Gharibian  
**Hearing Waived / Date Waived :** No  
**Hearing Location:**  
**Hearing Date :**  
**DIR Action:**  
**DIR Action Date:**  
**End of Appeal Period:**  
**Appealed:** No  
**BOE Reference Number:** 0  
**Case on Hold?:** Yes

**Primary Address**

Address	CNC	CD
11701 W WILSHIRE BLVD 11	None	CD 11

Section 15125 of the State CEQA Guidelines provides the following guidance for establishing the baseline:

*“An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.”*

Since a notice of preparation is not required for SCEAs, the appropriate baseline conditions in the vicinity of the project shall be described as they exist at the time the environmental analysis is commenced. As such, the cumulative impact analysis is compliant with CEQA. Furthermore, it should be noted that Case No. DIR-2022-7013-TOC-CDO-SPR-VHCA is currently on hold (see above exhibit). Generally, projects that are placed on hold are subject to uncertain delay and often times are either rescinded or substantially modified when they are revived. As such, this potential related project is too speculative to address for purposes of evaluating cumulative impacts as it is not an active project on file with the lead agency. Notwithstanding this determination, the referenced project is located over 1,000 feet from the Project. Localized construction impacts associated with noise, dust, air quality emissions, construction traffic/hauling activities generally occur within an area of 500 feet or less of the Project Site. Therefore, construction of any project at 11701 Wilshire Boulevard would not result in cumulative impacts when combined with the localized impacts of the proposed project. As such, no further analysis is required.

### **COMMENT LETTER NO. 3**

Bill Bujake  
Via email  
11910 Goshen Avenue  
Los Angeles, CA 90049  
August 8, 2023

#### **COMMENT 3.1**

Hi Alex,

I joined the 10am meeting just now but was having difficulty using the raise my hand function. I live at 11910 Goshen Ave and have the following questions and concerns about the proposed project:

- Doubling the FAR seems very excessive as FARs are there for a reason. Why would city allow?

#### **RESPONSE TO COMMENT 3.1**

As detailed in the SCEA, the City has allowed this FAR increase because the Project is consistent with the requirements of LAMC Section 12.22.A.25(f)(4)(ii). As noted in Table 1.1, Summary of Project Modifications, above, the revised project will include the development of 67,232 square feet of developed floor area, an increase of 1,066 square feet more than what was described in the SCEA. The resulting floor area increased from 2.94:1 to 3.0:1. In consideration of designating 15 percent of the base dwelling units as Very Low Income housing units, the proposed increase in floor area is allowed pursuant to the Density Bonus provisions of the LAMC Section 12.22.A.25.g.2. As such, no further analysis is required.

#### **COMMENT 3.2**

- More concerned about the height as my unit is close to the alley and this proposed building will block all southern views and likely southern light. Further, it appears there will be balconies on the proposed building's north side that will look down directly onto our rooftop decks.
  - How tall is this building relative to the one on the NE corner of Wilshire/Westgate?

#### **RESPONSE TO COMMENT 3.2**

The Project is proposed to have a maximum height of 89' and 9" and 7 stories. As noted in Table 1.1, Summary of Project Modifications, above, the revised project is six feet higher than what was identified in the SCEA. Although the number of stories has not changed (i.e., 7 stories above

grade), changes to the floor to ceiling height on levels 2 through 7 has resulted in a slight increase in the buildings overall height. In consideration of designating 15 percent of the base dwelling units as Very Low Income housing units, the proposed increase in building height is allowed pursuant to the Density Bonus provisions of the LAMC. As such, no further analysis is required.

The commenter's observations that the proposed project will have north facing balconies is correct. Views from private property are not protected under existing ordinance and are not public views or scenic views protected under local or state land use laws. The Project Site is zoned [Q]C4-1L-CDO with a General Plan land use designation of "Community Commercial." The proposed project would be compatible with the LAMC's building design standards with respect to setbacks, allowable building height and private open space. As such, the loss of private views is considered a less than significant impact under CEQA.

The building located at 11859 Wilshire Boulevard is described in city documents as a five story building. In 2001 the owner of the site obtained an Approval of Plans to allow the construction, use, and maintenance of an additional three sectors of antennas with each sector containing four antennas (maximum of 12 panel antennas), and radio equipment on the rooftop of a building previously approved as an unstaffed wireless telecommunications facility. Further the height of said antennas was allowed to be 88 feet above grade, exceeding the permitted height of 75 feet (See City of Los Angeles Case No. ZA 99-0470(CUZ)(PA)). As such the proposed project would be 1 foot and 9 inches higher than the height of the adjacent building with its rooftop apparatuses.

### **COMMENT 3.3**

- Where will traffic enter the building? Wilshire, Westgate, or alley? The alley would add a lot of traffic.

### **RESPONSE TO COMMENT 3.3**

Commercial and residential parking access will be provided along Westgate Avenue. Additional residential-only access will be provided via the alley for residents who have assigned parking spots located on Level 2.

### **COMMENT 3.4**

- Allowing this massive building will clearly diminish the value of my unit which I purchased less than four years ago.

### **RESPONSE TO COMMENT 3.4**

This comment does not raise any specific CEQA issue and will be noted for the record and forwarded to the City decisionmakers. Property values are not a CEQA issue and no further analysis is warranted.

## **6. Conclusion**

CEQA Guidelines Section 15088.5(a) provides guidelines that would require the Lead Agency to recirculate the environmental document when new information is added after public notice is given for availability for review. New information added is not considered “significant” unless the environmental document is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the project’s proponents have declined to implement. CEQA Guidelines Sections 15088.5(b) and (e) provide additional guidelines which state that recirculation is not required where the new information added merely clarifies, amplifies or makes insignificant modifications in an adequate environmental document and provided that the decision to not recirculate is supported by substantial evidence in the administrative record. As demonstrated by the Errata, these minor corrections and clarifications do not represent significant new information as defined in CEQA Guidelines Section 15088.5(a). As such, this Errata does not require recirculation, consistent with CEQA Guidelines Section 15088.5(b).