



December 5, 2023

[vial email: danalynn Dominguez@lacity.org]

Danalynn Dominguez, City Planner
City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 621
Los Angeles, CA 90012

**Re: RESPONSES TO COMMENT LETTERS FOR THE 5600 FRANKLIN AVENUE PROJECT
SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT**

Dear Ms. Dominguez,

On behalf of 162-166 Douglas, LLC (Project Applicant), Parker Environmental Consultants has reviewed the two comment letters that were submitted to the Department of City Planning during the public review period for the Sustainable Communities Environmental Assessment (SCEA) that was prepared for the 5600 Franklin Avenue Project (Proposed Project). The SCEA was published on October 19, 2023; and the public comment period ended on November 20, 2023. During the review period, the Lead Agency received comment letters from the following entities:

- California Department of Transportation (Caltrans), District 7
- Hollywood United Neighborhood Council

The following includes detailed responses to the comments and issues raised in the comment letters. As explained in the attached responses, the SCEA satisfies the environmental review requirements pursuant to the California Environmental Quality Act (CEQA) (P.R.C. 21000-21189.3), the State CEQA Guidelines (C.C.R. Title 14, Chapter 3, 15000-15387), and the City of Los Angeles' policies for implementing CEQA. Based on the information contained in the comment letters and the responses to the comment letters (attached hereto), there is no substantial evidence that the Proposed Project will have a significant effect on the environment requiring the preparation of an Environmental Impact Report (EIR) or require recirculation of the SCEA pursuant to Section 15088.5 of the State CEQA Guidelines. Accordingly, these responses may be incorporated into the record and no additional environmental analysis is required.

Danalynn Dominguez, City Planner City of Los Angeles
Department of City Planning
Re: 5600 Franklin Avenue Project – Responses to Comments
December 5, 2023
Page 2 of 13

Should you have any questions regarding any of the responses please contact me at (661) 257-2282 or by email at shane@parkerenvironmental.com.

Sincerely,

A handwritten signature in blue ink that reads "Shane E. Parker". The signature is fluid and cursive, with the first and last names being more prominent.

Shane E. Parker, Principal

Attachments:

A. *Bracketed Comment Letters*

-*Comment Letter 1: State of California Department of Transportation (Caltrans), November 20, 2023.*

-*Comment Letter 2: Hollywood United Neighborhood Council, November 17, 2023.*

COMMENT LETTER NO. 1

State of California
Department of Transportation
Caltrans, District 7
100 S. Main Street, MS 16
Los Angeles, Ca 90012

COMMENT 1.1

Dear Danalynn Dominguez,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The proposed project encompasses a Project area of approximately 18,999 square feet (0.436 acre). 162-166 Douglas, LLC (the "Applicant") proposes the demolition of an automotive service center and a four (4)-unit residential building and the construction, use and maintenance of a four-story, 41-unit residential building within Subarea A (Neighborhood Conservation) of the Vermont/Western Station Neighborhood Area Plan (SNAP) Specific Plan. Of the 41 dwelling units, five (5) units would be reserved for habitation by Extremely Low-Income households. The Project would encompass a total floor area of up to 44,366 square feet resulting in a Floor Area Ratio (FAR) of 3.24:1 and would have a maximum building height of 67 feet. The Project would also provide 3,273 square feet of open space area which includes a landscaped rear yard, a roof deck, and a recreation room. The Project includes 41 parking spaces and 32 bicycle parking spaces on the ground floor. The City of Los Angeles is the Lead Agency under the National Environmental Policy Act (NEPA).

RESPONSE TO COMMENT 1.1

This comment accurately restates the Project Description with the exception of the last sentence which incorrectly states that the City of Los Angeles is the Lead Agency under the National Environmental Policy Act (NEPA). The City of Los Angeles is the lead agency under the California Environmental Quality Act (CEQA) and not NEPA. The Proposed Project is a private development and is not seeking any federal assistance funds. As such, the Proposed Project is not subject to NEPA.

COMMENT 1.2

The closest state facilities are the US-101 and the SR-134. After reviewing the project's MND, Caltrans has the following comments:

- According to the LA County Bikeways Map, W Franklin Ave has been classified as a Class III bike route. In addition, Caltrans recommends revising/enhancing the design elements along W Franklin Ave to encourage residents to utilize the bike route and the LADOT Transit DASH-Hollywood Counterclockwise.

RESPONSE TO COMMENT 1.2

Caltrans's recommendation is noted for the record and will be forwarded to the decision-makers for their consideration. While Caltrans has referenced the LA County Bikeways Map, the Proposed Project is in fact located in the City of Los Angeles. The City's 2010 Bicycle Plan designates Franklin Avenue as a "Bicycle Friendly Street." Currently, Franklin Avenue is marked as a shared bike in both directions fronting the Project Site. The 2010 Bicycle Plan is incorporated into The Mobility Plan 2035, which identifies corridors proposed to receive improved bicycle, pedestrian, and vehicle infrastructure improvements. The Mobility Plan 2035 does not identify Franklin Avenue or Garfield Place as part of the Bicycle Enhanced Network (see SCEA at page 4-152). In accordance with the SNAP setback requirements, the Proposed Project would provide a 5-foot side setback fronting Franklin Avenue plus a 4-foot, six-inch (4'-6") dedication, which would not be located closer to the street than the multi-family residential building to the west of the Project Site. Thus, the Proposed Project would maintain the current roadway and sidewalk standards and would not impact the current configuration of the existing bikeway on Franklin Avenue. Furthermore, it should be noted that the Proposed Project does not propose any new curb cuts or vehicle entry points along Franklin Avenue. Vehicular ingress and egress to the Proposed Project's subterranean parking garage will occur via a single driveway located on Garfield Avenue. As such, the Proposed Project would not impact bicycle access on Franklin Avenue.

COMMENT 1.3

- Caltrans encourages the Lead Agency to consider any reduction in vehicle speeds to benefit pedestrian and bicyclist safety, as there is a direct link between impact speeds and the likelihood of fatality or serious injury. The most effective methods to reduce pedestrian and bicyclist exposure to vehicles is through physical design and geometrics. These methods include the construction of physically separated facilities such as Class IV bikeways, wide sidewalks, curb extensions, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing. Visual indicators such as, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage, and striping should be used in addition to physical design improvements to indicate to motorists that they can expect to see and yield to people walking or riding bikes.

RESPONSE TO COMMENT 1.3

This comment is noted for the record and will be forwarded to the decision-makers for their consideration. As noted in Response 1.2, above, the Proposed Project will have no impact on the existing bicycle lane on Franklin Avenue fronting the Project Site. The Proposed Project proposed a 4'-6" dedication on Franklin Avenue to maintain the established roadway and bikeway standards in accordance with the SNAP and the Mobility Element. No physical improvements or modifications are proposed within the right of way fronting the Project Site on Franklin Avenue.

The speed limits in the project area are set by the City of Los Angeles Department of Transportation and is not controlled by the Applicant.

COMMENT 1.4

- Caltrans recommends the following multimodal improvements for this project:
 - Incorporate bicycle infrastructure along W Franklin Ave, such as protected Class IV bikeways, to improve safety and comfort for all road users.
 - Be sure to include canopy trees, bioswales, bicycle parking facilities, and street furniture to provide a comfortable and sustainable environment to encourage active transportation modes and improve community health.
 - In addition to bioswales, incorporate permeable paving surfaces wherever possible to manage stormwater, replenish groundwater, and prevent pollution runoff.
 - Provide high quality bus shelters and bus bulb-outs for LADOT DASH-Hollywood Counterclockwise along Franklin Ave.
 - Use high-visibility continental crosswalks, curb extensions, count-down signal heads, pedestrian refuge islands, and pedestrian scrambles at all 4 crossings at the intersection of W Franklin Ave and Garfield Pl.
 - Leading pedestrian intervals can give pedestrians a 7-second head start in crosswalks; this provides additional crossing time and reduces the amount of time that pedestrians are exposed to high-speed vehicle traffic.

RESPONSE TO COMMENT 1.4

This comment is noted for the record and will be forwarded to the decision-makers for their consideration. The implementation of Caltrans' recommended improvements would occur outside the property limits and within the City's right-of way and are generally directed towards the lead agency and not the Proposed Project.

COMMENT 1.5

- Caltrans acknowledges and supports infill development that ultimately helps California to meet its climate, transportation, and livability goals. However, due to the amount of parking and lack of mixed land uses, the 5600 W Franklin Residential Project is designed in a way that induces demand for unnecessary vehicle trips. This demand should be addressed with appropriate design and management principles. Caltrans recommends the following:
 - Provide a mixture of uses. The project's location creates an opportunity to incorporate additional land-use types, as the essential component of sustainable communities is mixed-use zoning. Residential, Commercial, and Office uses should be intertwined to increase accessibility and bring destinations closer to where people live. This allows residents to utilize both transit and active modes to meet their everyday transportation needs.

RESPONSE TO COMMENT 1.5

This comment is noted for the record and will be forwarded to the decision-makers for their consideration. While the Proposed Project does not propose any retail or commercial land uses, the Proposed Project would help California to meet its climate, transportation, and livability goals by incorporating affordable housing units into the Proposed Project. Of the 41 dwelling units, 5 units would be reserved for habitation by Extremely Low Income households.

COMMENT 1.6

- The project would also provide the required on-site bicycle parking for short-term and long-term bike storage. In addition, the project provides 41 parking spaces which would not exceed the LAMC or Specific Plan. It is expected both electric charging stations and pre-wiring spaces for potential future electric vehicle charging would be included.

RESPONSE TO COMMENT 1.6

This comment is noted for the record and will be forwarded to the decision-makers for their consideration. The Proposed Project would be developed in accordance with the City's Green Building Code, which includes minimum standards for both electric charging stations and pre-wiring spaces for potential future electric vehicle charging. As noted on page 4-119 of the SCEA, Pursuant to City's Green Building Code, a minimum of 30 percent of the total code required parking is required to be capable of supporting future EVSE. Twenty-five (25) percent of the required residential parking spaces is required to be low power electric vehicle charging stations (EVCS), which can be counted towards the total number of EVSE spaces. The provision of EV infrastructure would further serve to promote the utilization of alternative fueled vehicles thus, reducing the combustion of fossil fuels. Therefore, although this measure mainly applies to City fleets, the Proposed Project would not conflict with these goals by installing EV chargers in at least 10 percent of total proposed parking spaces. Installation of additional EV chargers would encourage adoption of EVs.

COMMENT 1.7

- Caltrans recommends the following during the construction period:
 - Work with Caltrans Office of Permits, Multi-Modal Unit, for a designated truck route for construction trucks to transport construction equipment to and from the construction sites.
 - Construction vehicles/equipment should use alternative routes to avoid congested state facilities, especially during peak hours.
 - Cover construction trucks with tarpaulin to avoid debris spillage onto State facilities.

As a reminder, any transportation of heavy construction equipment and/or materials that requires the use of oversized transport vehicles on State Highways will need a Caltrans transportation permit. Caltrans recommends that the Project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans' review.

If you have any questions, please feel free to contact Jaden Oloresisimo, the project coordinator, at Jaden.Oloresisimo@dot.ca.gov and refer to GTS # 07-LA-2023-04345.

RESPONSE TO COMMENT 1.7

The above recommendations noted for the record and will be forwarded to the decision-makers for their consideration. The Applicant will obtain all applicable permits for oversized vehicles as may be necessary to construct the Proposed Project. As noted in PDF T-1, the Proposed Project will implement a Construction Management Plan which requires the scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible. Furthermore, the haul route will be reviewed by the City's Department of Transportation who will set permit conditions that will include a specified haul route that would designate a routes that would avoid sensitive receptors, congested state facilities, especially during peak hours, to the maximum extent feasible.

COMMENT LETTER NO. 2

Hollywood United Neighborhood Council
Certified Neighborhood Council #52
P.O. Box 3272, Los Angeles, CA 90078
Email:info@myhunc.com

To: Danalynn Dominguez (danalynn.dominquez@lacity.org)

Re: Sustainable Communities Environmental Assessment for 5600 W. Franklin (ENV-2020-3838-SCEA; DIR-2020-3737-TOC-SPP-HCA) for address 5600-5616 Franklin Avenue Project

COMMENT 2.1

The Hollywood United Neighborhood Council (HUNC) reviewed this SCEA at their regularly scheduled Planning and Land Use Management Committee (PLUM) meeting on November 2, 2023. HUNC PLUM forwarded a proposed letter to be considered by the full HUNC board at their

regularly scheduled meeting on November 13, 2023. However, HUNC was unable to have enough members present at that meeting for a quorum and no vote was taken. Although the proposed motion was not voted on by the full HUNC board and any recommendation should not be considered as voted on by the board, that due the newness of the SCEA program, the upcoming deadline for submittal of any comments to the SCEA and need for all involved to become familiar with the process, the proposed but not voted on PLUM comments follow:

- When a SCEA is submitted, the neighborhood councils should be given additional time to review and gather stakeholder input on such reports.

RESPONSE TO COMMENT 2.1

The Proposed Project is a Transit Priority Project which qualifies for a streamlined environmental review through a Sustainable Communities Environmental Assessment. Pursuant to Public Resources Code (P.R.C.), Section 21155.2, a draft of the sustainable communities environmental assessment shall be circulated for public comment for a period of not less than 30 days. Notice shall be provided in the same manner as required for an environmental impact report pursuant to Section 21092. The SCEA' review process was set in accordance with the CEQA statute. Further, as the lead agency is required to consider all comments received on the SCEA and conduct a public hearing prior to adopting the SCEA and approving the Proposed Project, the Neighborhood Council will have ample opportunity to provide additional comments as the Proposed Project continues through the environmental review process.

COMMENT 2.2

- High density projects do not have the sufficient shade to keep the building cool. Setbacks should not be given up.

RESPONSE TO COMMENT 2.2

The Proposed Project is seeking a Density Bonus incentive to reduce the required side yard setback from seven feet to five feet. The two- foot reduction in building setback on the building's south side would actually increase the amount of shading on the proposed building's southern façade as the building will be closer to the adjacent structure to the south. As such, the commenter's concern that the proposed setbacks would adversely affect the cooling effects of shading are unfounded.

COMMENT 2.3

- There is not enough space for a large enough canopy and root areas which will provide less shade and pollution reduction benefit.

RESPONSE TO COMMENT 2.3

Consistent with the LAMC and SNAP requirements, the Proposed Project would provide 18 trees on-site, 12 of which would be 24-inch box trees and 6 of which would be street trees. See SCEA page 2-27.

COMMENT 2.4

- Will there be a gas hookup for the building? A full clarification on how any gas would be used for the completed project should be provided.

RESPONSE TO COMMENT 2.4

The Proposed Project would comply with the City of Los Angeles Ordinance No. 187,714 which requires all new buildings constructed within the City to be all-electric buildings.

COMMENT 2.5

- No project should be considered until a greenspace area is determined as per the Vermont/Western SNAP.

RESPONSE TO COMMENT 2.5

Consistent with the SNAP requirements, the Proposed Project would be landscaped along all property lines and would include common open space on the ground level that would be the focal point of the Project Site.

COMMENT 2.6

- What is the environmental impact in terms of shade and light on neighboring buildings including increased utility costs due to this impact?

RESPONSE TO COMMENT 2.6

The Project Site is designated as a Transit Priority Area per the Department of City Planning's Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs)/ Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA. ZI-2452 clarifies that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's L.A. CEQA Thresholds Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA.

Nevertheless, the impacts from light sources are discussed on page 4-6 of the SCEA for informational purposes. The SCEA concluded the Proposed Project would not generate substantial increase in ambient lighting as the majority of lighting would be directed towards the interior of the Project Site and away from any nearby land uses. Additionally, the Proposed Project

would be four stories above grade, which would have a minimal shade impact to surrounding buildings.

The impacts from increased utilities are discussed in Section 4.VI, Energy, and Section 4.XIX, Utilities and Service Systems, of the SCEA. The SCEA determined the Proposed Project would result in less than significant impacts to utility infrastructure and energy resources.

COMMENT 2.7

- Earthquake fault issues should be clarified as well as a determination of the soil samples and hazardous materials for the gas station/mechanics parcel.

RESPONSE TO COMMENT 2.7

Impacts from earthquake faults are discussed under Checklist Question VII.(a) in Section VII, Geology and Soils. As stated on page 4-74 of the SCEA, the Project Site is located within an Alquist-Priolo Fault zone. However, Geotechnical Investigation (Appendix D of the SCEA) determined there is no evidence of an active fault crossing the Project Site. Nevertheless, the Proposed Project would be required to be designed and constructed conforming to the California Building Code seismic design standards, as approved by the Department of Building and Safety. Thus, as concluded in the SCEA, potential impacts from ground rupture from earthquake faults would be less than significant. An extensive discussion of the technical reports related to existing and past conditions of the Project Site is included in the SCEA beginning on page 4-128, including summaries of the soil vapor testing performed at the Project Site and required mitigation related to hazardous materials.

COMMENT 2.8

- What is the impact of the haul route on traffic and emergency response vehicles?

RESPONSE TO COMMENT 2.8

As discussed on page 4-208 of the SCEA, a Haul Truck Route program would be described for the Proposed Project and approved by LADOT as part of the Construction Management Plan (refer to Project Design Features PDF T-1). A detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, would be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. Furthermore, the haul route will be reviewed by the City's Department of Transportation who will set permit conditions that will include a specified haul route that would designate routes that would avoid sensitive receptors, congested state facilities, especially during peak hours, to the maximum extent feasible. The incorporation of Project Design Feature PDF T-1 would ensure any transportation impacts from the haul route are less than significant. Further, emergency vehicle drivers have a variety of options for avoiding

traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, as discussed in the SCEA on page 4-135, the Project Site is located not in a disaster route according to the Los Angeles Central Area Disaster Route Map of Los Angeles County, nor is the Project Site located on an identified disaster route or an adopted emergency response or evacuation plan according to the City of Los Angeles Safety Element. Therefore, the Proposed Project would not be expected to interfere with any adopted emergency response vehicles.

COMMENT 2.9

- Aesthetics should match the style of the neighborhood per the Vermont/Western SNAP.

RESPONSE TO COMMENT 2.9

The Project Site is designated as a Transit Priority Area per the Department of City Planning's Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs)/ Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA. ZI-2452 clarifies that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's L.A. CEQA Thresholds Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA.

Nevertheless, the Proposed Project would be designed to comply with the requirements of the SNAP Development Standards and Design Guidelines. As noted on page 4-154 of the SCEA, Table 5, Project Consistency with Vermont Western Station Neighborhood Area Plan Development Standards and Design Guidelines, in Appendix K of this SCEA, details the consistency of the Proposed Project with the development standards of the SNAP Development Standards and Design Guidelines for Subarea A – Neighborhood Conservation. As discussed in more detail below, and also provided in Table 5, the Proposed Project would comply with the development standards of the SNAP Development Standards and Design Guidelines regarding landscaping, open space, street trees, utilities, pedestrian access, curb cuts, driveways, parking, trash service, roofing, privacy, and façade design. Furthermore, the requirements and limitations set by Section 7 of the Specific Plan, which refer to developments in Subarea A, with respect to setbacks, street dedications, height, and parking, are discussed in further detail below. With approval of the requested discretionary entitlements, the Proposed Project would be substantially consistent with the applicable policies and design guidelines of the SNAP.

COMMENT 2.10

- How will they protect the community from the lead and asbestos from the demolition of the buildings?

RESPONSE TO COMMENT 2.10

Asbestos removal will be conducted in accordance with all applicable laws. As specified on page 3-27 of the SCEA, the Proposed Project shall comply with South Coast Air Quality Management

District Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities, which specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). (see RCM-AQ-2).

COMMENT 2.11

- There is concern of viable parking and the loss of affordable housing in the area.

RESPONSE TO COMMENT 2.11

The Project Site is currently developed with an auto service center and a multi-family residential building with four dwelling units. The Proposed Project would result in the demolition of the existing structures and the development of a multi-family residential building with 41 dwelling units. Thus, the Proposed Project would result in a net increase in affordable housing units in the area. Additionally, the Proposed Project would provide a total of 41 automobile parking spaces and 21 bicycle spaces to accommodate the Proposed Project's parking demands. As also discussed in the SCEA, Public Resources Code 21099 provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a Transit Priority Area shall not be considered significant impacts on the environment." Accordingly, the Proposed Project's aesthetic and parking impacts shall not be considered significant impacts on the environment as a matter of law under Public Resources Code Section 21099.

COMMENT 2.12

- Will there be adherence to the good neighbor construction practices?

RESPONSE TO COMMENT 2.12

As discussed on page 4-208 of the SCEA, the Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. Specifically, Project Design Feature PDF T-1, requires the following:

A detailed Construction Management Plan, including street closure information, detour plans, haul routes, and staging plans, would be prepared and submitted to LADOT for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and should include the following elements as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls (i.e., flag persons) during all construction activities adjacent to public rights-of-way to ensure traffic safety on public roadways. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag persons).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Potential sequencing of construction activity to reduce the amount of construction-related traffic on arterial streets.
- Containment of construction activity within the Project Site boundaries.
- Prohibition of construction-related vehicles/equipment parking on surrounding public streets.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible.

COMMENT 2.13

- How will they secure the adjacent parcel during construction once vacant and buildings are demolished?

Sincerely yours,

Jim Van Dusen* Sheila Irani*

Chair, Planning and Land Use Management Committee President

*signed electronically

RESPONSE TO COMMENT 2.13

As noted on page 4-5 of the SCEA, 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. Installation of temporary fencing and compliance with the applicable regulatory measures would further reduce visual impacts caused during the construction of the Proposed Project. Pursuant to LAMC Section 14.4.17, the Applicant would also be required to maintain the construction barrier to be free and clear of any unauthorized signs and graffiti within 24 hours of occurrence. Compliance with these regulatory requirements would ensure the scenic quality of the Project Site during construction.

ATTACHMENT A

Bracketed Comment Letters

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DEPARTMENT OF TRANSPORTATION

DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 266-3562
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



Making Conservation
a California Way of Life

November 20, 2023

Danalynn Dominguez
City of Los Angeles
200 North Spring Street, Room 621
Los Angeles, CA 90012

RE: 5600 W Franklin Ave – Draft
Sustainable Communities
Environmental Assessment (SCEA)
Vic. US-101, SR-134/PM LA 1.847,
10.338
GTS # 07-LA-2023-04345

Dear Danalynn Dominguez:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The proposed project encompasses a Project area of approximately 18,999 square feet (0.436 acre). 162-166 Douglas, LLC (the "Applicant") proposes the demolition of an automotive service center and a four (4)-unit residential building and the construction, use and maintenance of a four-story, 41-unit residential building within Subarea A (Neighborhood Conservation) of the Vermont/Western Station Neighborhood Area Plan (SNAP) Specific Plan. Of the 41 dwelling units, five (5) units would be reserved for habitation by Extremely Low-Income households. The Project would encompass a total floor area of up to 44,366 square feet resulting in a Floor Area Ratio (FAR) of 3.24:1 and would have a maximum building height of 67 feet. The Project would also provide 3,273 square feet of open space area which includes a landscaped rear yard, a roof deck, and a recreation room. The Project includes 41 parking spaces and 32 bicycle parking spaces on the ground floor. The City of Los Angeles is the Lead Agency under the National Environmental Policy Act (NEPA).

1.1

The closest state facilities are the US-101 and the SR-134. After reviewing the project's MND, Caltrans has the following comments:

- According to the LA County Bikeways Map, W Franklin Ave has been classified as a Class III bike route. In addition, Caltrans recommends revising/enhancing the design elements along W Franklin Ave to encourage residents to utilize the bike route and the LADOT Transit DASH-Hollywood Counterclockwise.
• Caltrans encourages the Lead Agency to consider any reduction in vehicle speeds to benefit pedestrian and bicyclist safety, as there is a direct link between impact speeds and the likelihood of fatality or serious injury. The most effective methods

1.2

1.3

to reduce pedestrian and bicyclist exposure to vehicles is through physical design and geometrics. These methods include the construction of physically separated facilities such as Class IV bikeways, wide sidewalks, curb extensions, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing. Visual indicators such as, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage, and striping should be used in addition to physical design improvements to indicate to motorists that they can expect to see and yield to people walking or riding bikes.

1.3
cont.

- Caltrans recommends the following multimodal improvements for this project:
 - Incorporate bicycle infrastructure along W Franklin Ave, such as protected Class IV bikeways, to improve safety and comfort for all road users.
 - Be sure to include canopy trees, bioswales, bicycle parking facilities, and street furniture to provide a comfortable and sustainable environment to encourage active transportation modes and improve community health.
 - In addition to bioswales, incorporate permeable paving surfaces wherever possible to manage stormwater, replenish groundwater, and prevent pollution runoff.
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1.4

- Caltrans acknowledges and supports infill development that ultimately helps California to meet its climate, transportation, and livability goals. However, due to the amount of parking and lack of mixed land uses, the 5600 W Franklin Residential Project is designed in a way that induces demand for unnecessary vehicle trips. This demand should be addressed with appropriate design and management principles. Caltrans recommends the following:

1.5

- Provide a mixture of uses. The project's location creates an opportunity to incorporate additional land-use types, as the essential component of sustainable communities is mixed-use zoning. Residential, Commercial, and Office uses should be intertwined to increase accessibility and bring destinations closer to where people live. This allows residents to utilize both transit and active modes to meet their everyday transportation needs.

- The project would also provide the required on-site bicycle parking for short-term and long-term bike storage. In addition, the project provides 41 parking spaces which would not exceed the LAMC or Specific Plan. It is expected both electric charging stations and pre-wiring spaces for potential future electric vehicle charging would be included. 1.6
- Caltrans recommends the following during the construction period:
 - Work with Caltrans Office of Permits, Multi-Modal Unit, for a designated truck route for construction trucks to transport construction equipment to and from the construction sites
 - Construction vehicles/equipment should use alternative routes to avoid congested state facilities, especially during peak hours.
 - Cover construction trucks with tarpaulin to avoid debris spillage onto State facilities. 1.7

As a reminder, any transportation of heavy construction equipment and/or materials that requires the use of oversized transport vehicles on State Highways will need a Caltrans transportation permit. Caltrans recommends that the Project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans' review.

If you have any questions, please feel free to contact Jaden Oloresisimo, the project coordinator, at Jaden.Oloresisimo@dot.ca.gov and refer to GTS # 07-LA-2023-04345.

Sincerely,

Frances Duong

FRANCES DUONG
Acting LDR/CEQA Branch Chief

cc: State Clearinghouse

COMMENT LETTER NO. 2

OFFICERS:

PRESIDENT Sheila Irani
VICE-PRESIDENT Jim Van Dusen
TREASURER John Schrader
SECRETARY Chad MacMurray



BOARD MEMBERS:

Shane Kalminsky Maria Anna Kochoa
Mark Millner Noelle North Norris
Oliver Alvarez Paul Barbosa

HOLLYWOOD UNITED NEIGHBORHOOD COUNCIL
Certified Neighborhood Council #52
P.O. Box 3272, Los Angeles, CA 90078
Email:info@myhunc.com

November 17, 2023

To: Danalynn Dominguez (danalynn.dominquez@lacity.org)

Re: Sustainable Communities Environmental Assessment for 5600 W. Franklin (ENV-2020-3838-SCEA; DIR-2020-3737-TOC-SPP-HCA) for address 5600-5616 Franklin Avenue Project

The Hollywood United Neighborhood Council (HUNC) reviewed this SCEA at their regularly scheduled Planning and Land Use Management Committee (PLUM) meeting on November 2, 2023. HUNC PLUM forwarded a proposed letter to be considered by the full HUNC board at their regularly scheduled meeting on November 13, 2023. However, HUNC was unable to have enough members present at that meeting for a quorum and no vote was taken. Although the proposed motion was not voted on by the full HUNC board and any recommendation should not be considered as voted on by the board, that due to the newness of the SCEA program, the upcoming deadline for submittal of any comments to the SCEA and need for all involved to become familiar with the process, the proposed but not voted on PLUM comments follow:

2.1

- When a SCEA is submitted, the neighborhood councils should be given additional time to review and gather stakeholder input on such reports.
- High density projects do not have the sufficient shade to keep the building cool. Setbacks should not be given up.
- There is not enough space for a large enough canopy and root areas which will provide less shade and pollution reduction benefit.
- Will there be a gas hookup for the building? A full clarification on how any gas would be used for the completed project should be provided.
- No project should be considered until a greenspace area is determined as per the Vermont/Western SNAP.
- What is the environmental impact in terms of shade and light on neighboring buildings including increased utility costs due to this impact? ,

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- Earthquake fault issues should be clarified as well as a determination of the soil samples and hazardous materials for the gas station/mechanics parcel. ☐ 2.7
- What is the impact of the haul route on traffic and emergency response vehicles? ≡ 2.8
- Aesthetics should match the style of the neighborhood per the Vermont/Western SNAP. ≡ 2.9
- How will they protect the community from the lead and asbestos from the demolition of the buildings? ☐ 2.10
- There is concern of viable parking and the loss of affordable housing in the area. ≡ 2.11
- Will there be adherence to the good neighbor construction practices? ≡ 2.12
- How will they secure the adjacent parcel during construction once vacant and buildings are demolished? ☐ 2.13

Sincerely yours,

Jim Van Dusen*
 Chair, Planning and Land Use Management Committee
 *signed electronically

Sheila Irani*
 President

