

**PLANNING DEPARTMENT TRANSMITTAL
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SUPPLEMENTAL
CF 18-1242

CITY PLANNING CASE:	ENVIRONMENTAL DOCUMENT:	COUNCIL DISTRICT:
CPC-2017-712-GPA-VZC-HD-VCU-SPR-1A	ENV-2017-713-MND	1
PROJECT ADDRESS:		
2005 West James Wood Boulevard; 731-847 South Alvarado Street; 730-840 South Alvarado Street; 2019-2101 West 8 th Street; 2030-2100 West 8 th Street; and 2019 West James M. Wood Boulevard		
PLANNER CONTACT INFORMATION:	TELEPHONE NUMBER:	EMAIL ADDRESS:
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NOTES / INSTRUCTION(S):	
Response to appeal	
TRANSMITTED BY:	TRANSMITTAL DATE:
Jenna Monterrosa	2/21/19

Date: January 17, 2019

To: Kevin Golden, Department of City Planning, City of Los Angeles

Cc: Infinitely Group Inc

From: Ned Baldwin, Senior Project Manager

Subject: Response to Appeal on the CPC Approval of ENV-2017-713-MND

This memo provides responses to comments contained in the December 10, 2018 appeal submitted by UniteHere! Local 11 on the approval action of the CPC regarding the proposed hotel at 2005 James M Wood Boulevard Project (ENV-2017-713-MND).

Comments on Housing

The UniteHere! Local 11 letter states that the MND ignores the need for housing at the site. The letter claims that a large portion of the site is zoned for residential use, though it is approximately 1/3 of the site, just 7,500 square feet, that is zoned residential. Though zoned residential, the area in question is currently used as surface parking and associated support functions of the commercial uses on the other portion of the site. This area of the site is not truly a part of the available housing stock for the City as the parcel is linked to the commercial parcels that make up the balance of the site and is currently utilized to support the existing commercial uses. As such, it is misleading of the letter to claim that the Project decreases the housing stock or would have any effect on market rent.

Furthermore, though the letter claims that an EIR should be prepared to address affordable housing, affordable housing is not an identified CEQA topic of evaluation. CEQA focuses on physical changes in the environment and "Economic or social effects of a project shall not be treated as significant effects on the environment." (CEQA Guidelines 15131 (a))

Comments on Land Use

The letter references Commercial Objective 2 and Policy 4 of the Westlake Community Plan. CEQA focuses on adverse physical changes to the environment and not on social or economic changes (See CEQA Guidelines 15064 (e)). Nonetheless, an examination of these Objectives and Policies shows the Project is not in substantial conflict.

Objective 2 states that the City shall provide a range of commercial facilities within the neighborhood that would provide shopping and employment opportunities. The Project would replace some existing commercial with a new commercial use. The surrounding area would still contain other commercial uses that meet the shopping needs of residents and the Project would increase employment opportunities within the community.

Policy 4 states that neighborhood-serving commercial uses be retained throughout the community. Though the Project would remove the commercial uses currently on the site, the general vicinity includes a range of neighborhood-serving commercial uses such that the Project would not result in a general loss of availability of such establishments within walking distance of residents.

The letter claims that the six-story proposed height would be out of scale with the surroundings. It is true that many of the surrounding properties are developed with one- and two-story structures. However, the site is within an area designated in the City's General Plan as a Regional Center, within which higher density uses are considered appropriate. The Project would also be within the existing permitted residential density, though it would exceed the existing permitted commercial density, and thus is seeking approval of a height change. No specific environmental effects have been identified in the MND or by the appellant due to the proposed height of the building.

Comments on Air Quality

The letter critiques the MND for only evaluating the potential impacts of the project on the closest sensitive receptor. The MND stated that potential impacts to the closest receptor would be less than significant. As a result, sensitive receptors located at a further distance were not evaluated since an increase in distance would decrease exposure to emissions. As such, there is no need to provide an inventory all sensitive receptors beyond that closest once it is determined that impacts to the closest would be less than significant.

The letter critiques the MND for failing to include a Health Risk Assessment (HRA). The City follows SCAQMD guidance for air quality analysis. SCAQMD's Health Risk Assessment (HRA) procedures call for evaluating risk from extended exposures as measured across several years and not for short term construction exposures. SCAQMD uses HRAs for compliance with AB2588, SCAQMD Rule 1401 and Rule 1402, which regulate stationary emission sources. SCAQMD has also adopted guidance on the use of Health Risk Assessments for analyzing mobile source emissions. However, this guidance refers to emissions associated with facilities such as truck stops and distribution centers that feature frequent, long-term presence of emission sources. Thus, the HRA methodology is not relevant for this Project.

In addition, the letter references SCAQMD Rule 1401.1. This rule refers to facilities that emit toxic air contaminants and are required to obtain permits to construct or permits to operate from SCAQMD. The Project is not a facility of this nature. Therefore, this point made in the appeal letter is irrelevant.