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June 3, 2022

LETTER TO FILE:
ENV-2021-3327-SCEA
Public Comments

The City of Los Angeles (City) prepared a Sustainable Communities Environmental Assessment (SCEA) dated March 29, 2022. The SCEA was released for public comment from April 14, 2022 to May 13, 2022.

In addition to the comments received from the entities identified in the "Letter to File" dated June 2, 2022, the following comment letter was received from:

- Cathy Roberts, President of the La Brea Hancock Homeowners Association

Sincerely,

VINCENT P. BERTONI, AICP
Director of Planning

DAVID WOON
Planning Assistant

VPB:HB:EC:DW

Enclosures

Public Comment



May 12, 2022

Mr. David Woon
Planning Assistant
Los Angeles City Planning Department
200 North Spring Street, Room 763
Los Angeles, CA. 90012

RE: 5001 Wilshire Project (ENV-2021-3327-SCEA)

Dear Mr. Woon,

These comments are submitted on behalf of the La Brea Hancock Homeowners Association (LBHHA) on the Sustainable Community Environmental Assessment (SCEA) for the project located at 5001 Wilshire (ENV-2021-3327-SCEA). The La Brea Hancock neighborhood is comprised of about 300 R1 homes. The project site is immediately adjacent to the northwest corner of the neighborhood at the intersection of South Citrus Avenue and Wilshire Boulevard. La Brea Hancock residents, especially those on both sides of the 600 block of South Citrus Avenue, will be greatly impacted by this project.

The project will be an improvement to the mini-mall currently on the site. And the linear park between the project and our R1 neighborhood is appreciated. We strongly agree with the finding addressed in Appendix H (Page 2) that South Citrus Avenue be closed to traffic south of the Carling Way alley.

However, the SCEA Project Description (Section II) is remiss in omitting any narrative discussion about the use of bollards (or other measures) to limit the intrusion of project traffic on South Citrus Avenue north of the site. While the location of the bollards is shown in this section on Figure II-4 and Appendix H has a relatively full discussion of the alternatives currently being considered, it is surprising that this aspect of the project design did not warrant discussion in Section II. The use of these bollards, a reason why the project enjoys a measure of community support, is integral to understanding the impacts of the project. This information should not be buried in a technical appendix. Please modify the project description to provide, at least, an overview of this key project-related improvement to the circulation network.

We do have concerns related to construction noise, construction traffic, and methane gas. We also comment below about key omissions, inaccurate and contradictory information in the SCEA's Project Description (Section II),

Construction Noise:

The construction noise mitigation measures included in the SCEA are generic and not specifically tailored to the project site. Please note that the SCEA states that the construction period for the project is estimated at 32 months. Since residents of R-1 single-family homes immediately adjacent to the project site who will be exposed to this impact for this duration, noise impacts must be mitigated and the City must assure that mitigation will be effective. The SCEA estimates a 5.7 dBA increase in construction noise from an adjacent home on Highland Avenue and a 13.7 dBA increase at an adjacent home on Citrus Avenue. Under the City's CEQA Thresholds, a 5.0 dBA increase is considered significant, hence

mitigation is required. The SCEA mitigates this noise with a temporary sound wall and noise-reduction equipment (mufflers) on construction vehicles and equipment. According to the SCEA, the mitigation measures will result in a sufficient reduction of construction noise to less than 5 dBA at each receptor location.

This analysis lacks the following information:

- (1) where specifically on the site will the temporary sound wall be placed and how close will this wall be to the nearest R-1 homes?
- (2) what is the proposed height of the sound wall?
- (3) what is the material composition of the sound wall?
- (4) and given, the previous three factors, how much noise reduction is likely to occur?
- (5) in addition, will the sound wall also protect the R1 homes from construction dust?

Clearly, the location of the wall, its height and material composition are all key factors in determining how much noise will be mitigated. The SCEA provides a quantitative estimate of how construction noise will be mitigated without an explanation of how this estimate was derived.

Construction Traffic:

The LBHHA is pleased that the proposed haul route for this project avoids South Citrus Avenue and Highland Avenue by using Wilshire Boulevard for both ingress and egress. As a result, there will be no construction impact to nearby residences from these vehicles. We are concerned, however, about the potential impact on these streets from other construction vehicles and equipment. The SCEA does not describe or prescribe how these vehicles will access the site. The Traffic Assessment (Appendix H, Page 3-4) recommends that “construction related traffic be limited to off-peak hours to the extent possible.” Yet, this recommendation, or other similar measures, are not carried forward into the SCEA as mitigation measures.

Mitigation to avoid the presence of construction equipment and vehicles on South Citrus Avenue north of the project site and on Highland Avenue is necessary for the following reasons:

- (1) South Citrus Avenue is a narrow street with residential parking on both sides of the street
- (2) The project site is located at a busy intersection (Wilshire Boulevard and Highland Avenue) which operates at Level of Service (LOS) F under existing conditions and under future conditions with and without the project. The use of construction vehicles and equipment on Highland Avenue near this intersection during peak hours, by northbound or southbound traffic will measurably worsen what is already a bad situation at this intersection.
- (3) In addition, the use of these streets by these vehicles may also be limited by current restrictions which exclude vehicles that weigh more than 6,000 pounds.

The Traffic analysis in the SCEA does not address this issue. Is it the SCEA's position that this impact is less than significant? If so, the community deserves a full explanation of why. For this impact, mitigation can be achieved by limiting access by construction vehicles and equipment to Wilshire Boulevard and/or South Citrus Avenue south of the R-1 homes.

Methane Gas:

The SCEA fails to fully discuss and mitigate potential hazards associated with the presence and combustion of methane gas. Methane, a colorless and odorless gas, is flammable at concentrations between 5% and 15% (by volume) in air. The site is located in a City-designated Methane Zone, hence

project-related construction activities may expose methane to air at a concentration where explosions may occur. Typically, CEQA documents in locations with similar potential impacts cite adherence to the City's Department of Building Safety Methane Compliance Standards and applicable OSHA worker safety regulations to justify mitigation to a less than significant level. For some reason, those measures were not included in this document.

While the location of the project in a Methane Zone is noted in the project's Geotechnical Study (Appendix E, Page 9), this document also states "Prior to approval of the proposed project, the City of Los Angeles will require a site-specific methane study be performed to evaluate the potential for methane and other volatile gases to impact the proposed development. We recommend that a qualified methane consultant be retained to perform the study and provide mitigation measures as necessary."

Apparently, this study has not yet been completed. Since the applicant's own geotechnical study acknowledges that mitigation may be necessary, the City is not in a position to approve the SCEA since this approval requires a finding that all environmental impacts are mitigated to less than significant levels. Sections 15073.5(b) and 15088.5(a) of the California CEQA Guidelines (2022) also establish requirements for the recirculation of CEQA documents. Under these guidelines, it is clear that recirculation is required in this case where the SCEA fails to identify and mitigate a potentially significant impact of the project.

SCEA Project Description:

The CEQA document should fully describe the project being evaluated. The description must be thorough and clear to enable the public to fully understand the project.

The Project Summary (Table II-2, Page II-9) indicates that the total required open space is 25,825 square feet (SF) and the total open space provided is 26,350 SF. To say that the total required open space is 25,825 SF is misleading because the City does not require this much open space for the project. The square footage in this table is the amount of open space required given the current zoning. As a TOC project, it is required to provide only 75% the total shown in the SCEA. In addition, this table shows that the project will provide 26,350 SF of open space. This is clearly not true. In an email to our Hancock Park neighbor, Debbie Alpers, dated May 5, 2022, David Woon (Case Planner) acknowledges that the entire green belt open space area was not included in this open space calculation. Yet, this total (26,350 SF) is presented in the SCEA Project Description as the total open space provided by the project. The Conceptual Greenbelt Plan (Figure II-25) shows the entire area to be developed as open space. Table II-9 and the accompanying narrative should be revised to estimate square footage for the entire area shown in Figure II-25. The open space discussion in Section II does not even mention this figure. It is curious that Table II-9 shows 61 trees as open space to be provided based on entire area shown in Figure II-25 but the rest of Table II-2 is based on open space based on only part of this open space area. Also, it is not clear whether the square footages shown in Table II-2 are repeated or used to estimate impacts elsewhere in the SCEA Environmental Impact Analysis (Section IV). If so, the document may need to be revised throughout.

Summary:

The SCEA was published on-line as fifty separate files making the report difficult to access. Some figures did not accurately reflect recent changes to the project by the applicant (e.g. the dwelling unit mix for the project was recently changed without changing a figure with this breakdown)

As discussed above, the SCEA fails to disclose and mitigate a potentially significant impact (methane). The SCEA project description leaves out a key aspect of the project, the use of bollards to block northbound traffic on South Citrus Avenue. It also uses misleading and incorrect figures in discussing how much open space is provided by the project. Under these circumstances, the report should be revised and the document recirculated for public review.

Thank you for the opportunity to comment.

Cathy Roberts
President, La Brea Hancock Homeowners Association