

## **A-4 Public Comments on the NOP**

# **Agency Comment Letters**



Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Ken Alex  
Director

Notice of Preparation

November 25, 2015

RECEIVED  
CITY OF LOS ANGELES

DEC 04 2015

ENVIRONMENTAL  
UNIT

To: Reviewing Agencies

Re: 6220 West Yucca Project  
SCH# 2015111073

Attached for your review and comment is the Notice of Preparation (NOP) for the 6220 West Yucca Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

**William Lamborn**  
**City of Los Angeles**  
**200 N. Spring Street, Room 750**  
**Los Angeles, CA 90012**

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Attachments  
cc: Lead Agency

**Document Details Report**  
**State Clearinghouse Data Base**

**SCH#** 2015111073  
**Project Title** 6220 West Yucca Project  
**Lead Agency** Los Angeles, City of

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**Type** **NOP** Notice of Preparation  
**Description** Demolition of all existing uses and development of two buildings (6- and up to 32-stories) to include 191 multi-family residential units (including 39 affordable units), 260 hotel rooms, ~6,980 sf of commercial/restaurants uses, and a total of 372,450 sf of floor area. Parking for all proposed uses would be provided within a six-level (one semi-subterranean level) parking structure housed with the podium structure of 32-story building.

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**Lead Agency Contact**

**Name** William Lamborn  
**Agency** City of Los Angeles  
**Phone** (213) 978-1470 **Fax**  
**email**  
**Address** 200 N. Spring Street, Room 750  
**City** Los Angeles **State** CA **Zip** 90012

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**Project Location**

**County** Los Angeles  
**City** Los Angeles, City of  
**Region**  
**Cross Streets** West Yucca Street between Argyle Avenue  
**Lat / Long**  
**Parcel No.** 5546-031-031;5546-031-007,008;5546-031-027  
**Township** 1S **Range** 14W **Section** 11 **Base** SBB&M

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**Proximity to:**

**Highways** SR101, 2, 170  
**Airports**  
**Railways** Metro Red Line  
**Waterways**  
**Schools** Several  
**Land Use** Regional Center Commercial and Medium Residential. Currently zoned Commercial-Height District 2 with Development Limitation-Sign Supplemental Use District (C4-2D-SN), Multiple Dwelling-Height District 2 with Development Limitation (R4-2D), and Multiple Dwelling Height District 1XL ([Q]R3-1XL).

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**Project Issues** Aesthetic/Visual; Air Quality; Archaeologic-Historic; Drainage/Absorption; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects

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**Reviewing Agencies** Resources Agency; Office of Historic Preservation; Department of Parks and Recreation; Resources, Recycling and Recovery; Department of Water Resources; Department of Fish and Wildlife, Region 5; Department of Housing and Community Development; Native American Heritage Commission; Public Utilities Commission; California Highway Patrol; Caltrans, District 7; Air Resources Board; State Water Resources Control Board, Division of Drinking Water; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 4

**Document Details Report**  
**State Clearinghouse Data Base**

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***Date Received*** 11/25/2015

***Start of Review*** 11/25/2015

***End of Review*** 12/24/2015



RECEIVED  
CITY OF LOS ANGELES

DEC 28 2015

MAJOR PROJECTS  
UNIT

December 21, 2015



Attn: William Lamborn, Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects and Environmental Analysis Section  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

**RE: 6220 West Yucca Project; Case No. ENV-2014-4706-EIR**

The Soboba Band of Luiseño Indians appreciates your observance of Tribal Cultural Resources and their preservation in your project. The information provided to us on said project(s) has been assessed through our Cultural Resource Department, where it was concluded that although it is outside the existing reservation, the project area does fall within the bounds of our Tribal Traditional Use Areas. At this time the Soboba Band does not have any specific concerns regarding known cultural resources in the specified areas that the project encompasses, but does request that the appropriate consultation continue to take place between the tribes, project proponents, and government agencies.

Also, working in and around traditional use areas intensifies the possibility of encountering cultural resources during any future construction/excavation phases that may take place. For this reason the Soboba Band of Luiseño Indians requests that approved Native American Monitor(s) be present during any future ground disturbing proceedings, including surveys and archaeological testing, associated with this project. The Soboba Band wishes to defer to Gabrieleño Tribal Consultants, who are closer to the project area. Please feel free to contact me with any additional questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe", with a long horizontal line extending to the right.

Joseph Ontiveros  
Cultural Resource Director  
Soboba Band of Luiseño Indians  
P.O. Box 487  
San Jacinto, CA 92581  
Phone (951) 654-5544 ext. 4137  
Cell (951) 663-5279  
[jontiveros@soboba-nsn.gov](mailto:jontiveros@soboba-nsn.gov)

Confidentiality: The entirety of the contents of this letter shall remain confidential between Soboba and the City of Los Angeles. No part of the contents of this letter may be shared, copied, or utilized in any way with any other individual, entity, municipality, or tribe, whatsoever, without the expressed written permission of the Soboba Band of Luiseño Indians.

----- Forwarded message -----

From: **Madfis, Haylee** <[MadfisH@metro.net](mailto:MadfisH@metro.net)>

Date: Wed, Dec 23, 2015 at 2:46 PM

Subject: 6220 W. Yucca Project\_NOP\_DEIR\_Metro Comments 12.23.15

To: "[william.lamborn@lacity.org](mailto:william.lamborn@lacity.org)" <[william.lamborn@lacity.org](mailto:william.lamborn@lacity.org)>

Cc: "Carvajal, Elizabeth" <[CarvajalE@metro.net](mailto:CarvajalE@metro.net)>

Dear Mr. Lamborn,

Attached please find our agency's comments on the 6220 W. Yucca Project NOP for the Draft EIR. Also find attached: CMP Appendix D: Guidelines for CMP Transportation Impact Analysis, Noise Easement Deed, and the Adjacent Construction Manual. Thank you.

A hard copy will follow via US Mail.

Best Regards,

**Haylee Madfis**

Strategic Initiatives | Countywide Planning & Development

Los Angeles County Metropolitan Authority

One Gateway Plaza | Los Angeles, CA 90012

**P:** [213-922-2458](tel:213-922-2458)

**E:** [madfish@metro.net](mailto:madfish@metro.net)







**Metro**

Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

December 22, 2015

William Lamborn  
Major Projects and Environmental Analysis Section  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

**RE: 6220 W. Yucca Project-City of Los Angeles- Notice of Preparation for the Draft Environmental Impact Report- ENV-2014-4706-EIR**

Dear Mr. Lamborn:

Thank you for the opportunity to comment on the Notice of Preparation of the Draft Environmental Impact Report for the proposed 6220 W. Yucca Project located at 1756, 1760 North Argyle Ave; 6210-6224 West Yucca St.; and 1765, 1771, 1777 and 1779 North Vista Del Mar Ave in the City of Los Angeles. This proposed project consists of the demolition and redevelopment of the site with a mixed-use residential, hotel, and commercial/restaurant project. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

It is noted that the project site is in close proximity to the Metro Red Line subway tunnel, and the Hollywood / Vine Station (Station). While LACMTA strongly supports development near transit, the following concerns related to the project's proximity to the subway tunnel should be addressed:

1. The project sponsor should be advised that the Metro Red Line subway may operate peak service as often as every four minutes in both directions and that trains may operate, in and out of revenue service, 24 hours a day, seven days a week, in the tunnel below the proposed project.
2. The construction and operation of the proposed project must not disrupt the operation and maintenance activities of the Metro Red Line or the structural and systems integrity of Metro's Red Line subway tunnels.
3. Considering the proximity of the proposed project to the subway tunnel, it is expected that rail operations will produce noise and vibration. A recorded Noise Easement Deed in favor of LACMTA is required prior to the completion and/or occupancy of the project, a form of which is attached. The easement recorded in the Deed will extend to successors and tenants, as well. In addition, any noise mitigation required for the Project must be borne by the developers of the Project and not LACMTA.
4. Consistent with ZI No. 1117, prior to the City issuing a building permit within 100 feet of the Metro Rail construction area, clearance shall be obtained from LACMTA. LACMTA will need to

review the geotechnical report, structural foundation plans, sections, shoring plan sections and calculations. Please refer to the attached LACMTA "Design Criteria and Standards, Volume III - Adjacent Construction Design Manual" for more details regarding submitting drawings and calculations to LACMTA for review. Please note that LACMTA requires an Engineering Review Fee for evaluation of any impacts based on adjacency and relationship of the proposed building to the Metro existing structures.

5. LACMTA staff shall be permitted to monitor construction activity to ascertain any impact to the subway tunnel.
6. The project sponsor should be advised that LACMTA may request reimbursement for costs incurred as a result of project construction/operation issues that cause delay or harm to Metro service delivery or infrastructure.
7. The project sponsor will be required to notify LACMTA of any changes to the construction/building plans that may or may not impact the subway tunnel.
8. Aspet Davidian, Director, Project Engineering Facilities, should be contacted at 213-922-5258 regarding the project's potential impacts on Metro's Red Line station and tunnels.

Beyond impacts to Metro facilities and operations, LACMTA must also notify the applicant of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County", Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

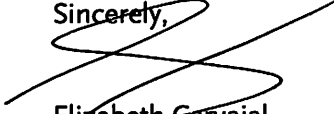
1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions regarding this response, please contact Elizabeth Carvajal at 213-922-3084 or by email at [DevReview@metro.net](mailto:DevReview@metro.net). LACMTA looks forward to reviewing the Draft EIR. Please send it to the following address:

LACMTA Development Review  
One Gateway Plaza MS 99-23-4  
Los Angeles, CA 90012-2952

Sincerely,

A handwritten signature in black ink, appearing to read 'Elizabeth Carvajal', written over the word 'Sincerely,'.

Elizabeth Carvajal  
Transportation Planning Manager

**Attachments:**

- CMP Appendix D: Guidelines for CMP Transportation Impact Analysis
- LACMTA "Design Criteria and Standards, Volume III - Adjacent Construction Design Manual"
- Noise Easement Deed

# GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

*Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."*

## D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- ☐ Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- ☐ Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- ☐ Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

## D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

### D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

### D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- ☐ All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- ☐ If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- ☐ Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- ☐ Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

**If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).**

### D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

**D.5.1 Existing Traffic Conditions.** Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

**D.5.2 Selection of Horizon Year and Background Traffic Growth.** Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

## **D.6 PROPOSED PROJECT TRAFFIC GENERATION**

Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

## **D.7 TRIP DISTRIBUTION**

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

## **D.8 IMPACT ANALYSIS**

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

**D.8.1 Intersection Level of Service Analysis.** The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- ☐ The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- ☐ The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

**D.8.2 Arterial Segment Analysis.** For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

**D.8.3 Freeway Segment (Mainline) Analysis.** For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

**D.8.4 Transit Impact Review.** CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- ☐ Evidence that affected transit operators received the Notice of Preparation.
- ☐ A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- ☐ Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both “peak hour” and “daily” refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- ☐ Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
  - Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
  - For each time period, multiply the result by one of the following factors:
    - 3.5% of Total Person Trips Generated for most cases, except:
      - 10% primarily Residential within 1/4 mile of a CMP transit center
      - 15% primarily Commercial within 1/4 mile of a CMP transit center
      - 7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
      - 9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
      - 5% primarily Residential within 1/4 mile of a CMP transit corridor
      - 7% primarily Commercial within 1/4 mile of a CMP transit corridor
      - 0% if no fixed route transit services operate within one mile of the project

To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- ☐ Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction’s TDM Ordinance measures, but other project specific measures.



- ☐ Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- ☐ Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

## D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

**D.9.1 Criteria for Determining a Significant Impact.** For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ( $V/C \geq 0.02$ ), causing LOS F ( $V/C > 1.00$ ); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ( $V/C \geq 0.02$ ). The lead agency may apply a more stringent criteria if desired.

**D.9.2 Identification of Mitigation.** Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- ☐ Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- ☐ Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

**D.9.3 Project Contribution to Planned Regional Improvements.** If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- ☐ Any project contribution to the improvement, and
- ☐ The means by which trips generated at the site will access the regional facility.

**D.9.4 Transportation Demand Management (TDM).** If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

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**D.10 REFERENCES**

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.

RECORDING REQUESTED BY  
AND WHEN RECORDED MAIL TO:

LOS ANGELES COUNTY METROPOLITAN  
TRANSPORTATION AUTHORITY  
Real Estate Department  
Deputy Executive Officer - Real Estate  
P: 213-922-2415 F: 213-922-2400  
One Gateway Plaza, Mail Stop 99-18-4  
Los Angeles, CA 90012-2932

Space Above Line for Recorder's Use

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[Recordation of this Public Document is Exempt from all Recording Fees and Taxes Pursuant to  
Government Code Section 6103]

Public Agency - No Tax Statement

**NOISE EASEMENT DEED**

For valuable consideration, receipt of which is hereby acknowledged, **(Name of Owner)**, a  
\_\_\_\_\_, for themselves, their heirs, administrators, executors,  
successors, assigns, tenants, and lessees do hereby grant, bargain, sell, and convey to the  
**LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY**, a public  
agency existing under the authority of the laws of the State of California ("Grantee"), its  
successors and assigns, for the use and benefit of the public and its employees, a perpetual,  
assignable easement in that certain real property in the City of Los Angeles, County of Los  
Angeles, State of California described in Exhibit "A" attached hereto and incorporated herein by  
this reference,

Said easement shall encompass and cover the entirety of the Grantors' Property  
having the same boundaries as the described Property and extending from the sub-  
surface upwards to the limits of the atmosphere of the earth, the right to cause in said  
easement area such noise, vibrations, fumes, dust, fuel particles, light, sonic  
disturbances, and all other effects that may be caused or may have been caused by  
the operation of public transit vehicles traveling along the Project right of way.

Grantor hereby waives all rights to protest, object to, make a claim or bring suit  
or action of any purpose, including or not limited to, property damage or personal  
injuries, against Grantee, its successors and assigns, for any necessary operating and  
maintenance activities and changes related to the Project which may conflict with  
Grantors' use of Grantors' property for residential and other purposes, and Grantors  
hereby grants an easement to the Grantee for such activities.

The granting of said Easement shall also establish the Grantors' right to further modify or  
develop the Property for any permitted use. However, Grantor's rights of development shall  
not interfere with the continued operation of Grantee's Project.

It is understood and agreed that these covenants and agreements shall be permanent, perpetual, will run with the land and that notice shall be made to and shall be binding upon all heirs, administrators, executors, successors, assigns, tenants and lessees of the Grantor. The Grantee is hereby expressly granted the right of third party enforcement of this easement.

IN WITNESS WHEREOF, the undersigned has caused its/their signature to be affixed this day of \_\_\_\_\_, 20\_\_\_\_

By: \_\_\_\_\_  
Name

By: \_\_\_\_\_  
Name

(ATTACH NOTARY SEAL AND CERTIFICATE HERE.)

**CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT****CIVIL CODE § 1189**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California )

County of \_\_\_\_\_ )

On \_\_\_\_\_ before me, \_\_\_\_\_,

Date

Here Insert Name and Title of the Officer

personally appeared \_\_\_\_\_

Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature \_\_\_\_\_

Signature of Notary Public

Place Notary Seal Above

**OPTIONAL**

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

**Description of Attached Document**

Title or Type of Document: \_\_\_\_\_ Document Date: \_\_\_\_\_

Number of Pages: \_\_\_\_\_ Signer(s) Other Than Named Above: \_\_\_\_\_

**Capacity(ies) Claimed by Signer(s)**

Signer's Name: \_\_\_\_\_

☐ Corporate Officer — Title(s): \_\_\_\_\_☐ Partner — ☐ Limited ☐ General☐ Individual ☐ Attorney in Fact☐ Trustee ☐ Guardian or Conservator☐ Other: \_\_\_\_\_

Signer Is Representing: \_\_\_\_\_

Signer's Name: \_\_\_\_\_

☐ Corporate Officer — Title(s): \_\_\_\_\_☐ Partner — ☐ Limited ☐ General☐ Individual ☐ Attorney in Fact☐ Trustee ☐ Guardian or Conservator☐ Other: \_\_\_\_\_

Signer Is Representing: \_\_\_\_\_

## CERTIFICATE OF ACCEPTANCE

This is to certify that the interest in the real property conveyed by the foregoing Grant Deed from \_\_\_\_\_, a **California Limited Partnership**, ("Grantor") to **LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY**, a public agency existing under the authority of the laws of the State of California ("LACMTA"), is hereby accepted by the undersigned on behalf of the LACMTA pursuant to authority conferred by resolution of the Board of Directors of the LACMTA, and the Grantee hereby consents to the recordation of this Deed by its duly authorized officer.

Dated this \_\_\_\_ day of \_\_\_\_\_, 20\_\_

By: \_\_\_\_\_  
Velma C. Marshall  
Deputy Executive Officer - Real Estate

**ADJACENT CONSTRUCTION DESIGN MANUAL****1.0 INTRODUCTION**

- 1.1 Parties planning construction over, under or adjacent to a Metropolitan Transportation Authority (MTA) facility or structure are advised to submit for review seven (7) copies of their drawings and four (4) copies of their calculations showing the relationship between their project and the MTA facilities, for MTA review. The purpose of the MTA review is to reduce the chance of conflict, damage, and unnecessary remedial measures for both MTA and the parties. Parties are defined as developers, agencies, municipalities, property owners or similar organizations proposing to perform or sponsor construction work near MTA facilities.
- 1.2 Sufficient drawings and details shall be submitted at each level of completion such as Preliminary, In-Progress, Pre-final and Final, etc. to facilitate the review of the effects that the proposed project may or may not have on the MTA facilities. An MTA review requires internal circulation of the construction drawings to concerned departments (usually includes Construction, Operations, Maintenance, and Real Estate). Parties shall be responsible for all costs related to drawing reviews by MTA. MTA costs shall be based upon the actual hours taken for review at the hourly rate of pay plus overhead charges. Drawings normally required for review are:
- A. Site Plan
  - B. Drainage Area Maps and Drainage Calculations
  - C. Architectural drawings
  - D. Structural drawings and calculations
  - E. Civil Drawings
  - F. Utility Drawings
  - G. Sections showing Foundations and MTA Structures
  - H. Column Load Tables
  - I. Pertinent Drawings and calculations detailing an impact on MTA facilities
  - J. A copy of the Geotechnical Report.
  - K. Construction zone traffic safety and detour plans: Provide and regulate positive traffic guidance and definition for vehicular and pedestrian traffic adjacent to the construction site to ensure traffic safety and reduce adverse traffic circulation impact.
  - L. Drawings and calculations should be sent to:

**MTA Third Party Administration (Permits Administration)**  
**Los Angeles County Metropolitan Transportation Authority**  
One Gateway Plaza  
Los Angeles, California 90012

- 1.3 If uncertainty exists on the possible impacts a project may have on the MTA facilities, and before submitting a formal letter requesting a review of a construction project adjacent to the Metro System, the party or his agent may contact the MTA Third Party Administrator (Permits ). The Party shall review the complexity of the project, and receive an informal evaluation of the amount of detail required for the MTA review. In those cases, whereby it appears the project will present no risk to MTA, the Third Party Administrator (Permits) shall immediately route the design documents to Construction, Operations, Maintenance, and Real Estate departments for a preliminary evaluation. If it is then confirmed that MTA risk is not present, the Administrator shall process an approval letter to the party.
- 1.4 A period of 30 working days should be allowed for review of the drawings and calculations. Thirty (30) work days should be allowed for each successive review as required. It is noted that preliminary evaluations are usually produced within 5 working days.
- 1.5 The party shall reimburse the MTA for any technical review or support services costs incurred that are associated with his/her request for access to the Metro Rail System
- 1.6 The following items must be completed before starting any construction:
- A. Each part of the project's design may be reviewed and approved by the MTA. The prime concern of the MTA is to determine the effect of the project on the MTA structure and its transit operations. A few of the other parts of a project to be considered are overhead protection, dust protection, dewatering, and temporary use of public space for construction activities.
  - B. Once the Party has received written acceptance of the design of a given project then the Party must notify MTA prior to the start of construction, in accordance with the terms of acceptance.
- 1.7 Qualified Seismic, Structural and Geotechnical Oversight
- The design documents shall note the name of the responsible Structural Engineer and Geotechnical Engineer, licensed in the State of California.

## 2.0 REVIEW PROCEDURE

- 2.1 All portions of any proposed design that will have a direct impact on an MTA facility or structure will be reviewed to assure that the MTA facility or structure is not placed in risk at any time, and that the design meets all applicable codes and criteria. Any portion of the proposed design that is to form part of an MTA controlled area shall be designed to meet the MTA Design Criteria and Standards.
- 2.2 Permits, where required by the local jurisdiction, shall be the responsibility of the party. City of L.A. Dept. of Bldg. and Safety and the Bureau of Engineering permit review shall remain in effect. Party shall refer to MTA Third Party Administration policies and procedures, THD5 for additional information.
- 2.3 Monitoring of the temporary support of excavation structures for adjacent construction shall be required in all cases for excavations within the geotechnical zone of influence of MTA structures. The extent of the monitoring will vary from case to case.
- 2.4 Monitoring of the inside of MTA tunnels and structures shall be required when the adjacent



excavation will unload or load the MTA structure or tunnel. Monitoring of vertical and horizontal distortions will include use of extensometers, inclinometers, settlement reference points, tiltmeters, groundwater observation wells, tape extensometer anchor points and load cells, as appropriately required. Acceptable limits of movement will depend on groundwater conditions, soil types and also the length of service the stations and tunnels have gone through. Escorts will be required for the survey parties entering the Metro operating system in accordance with MTA Operating Rules and Procedures. An MTA account number will be established and the costs for the escort monitoring and surveying service will be billed directly to the party or his agent as in section 1.2.

2.5 The calculations submitted for review shall include the following:

- A. A concise statement of the problem and the purpose of the calculation.
- B. Input data, applicable criteria, clearly stated assumptions and justifying rationale.
- C. References to articles, manuals and source material shall be furnished with the calculations.
- D. Reference to pertinent codes and standards.
- E. Sufficient sketches or drawing references for the work to be easily understood by an independent reviewer. Diagrams indicating data (such as loads and dimensions) shall be included along with adequate sketches of all details not considered standard by MTA.
- F. The source or derivation of all equations shall be shown where they are introduced into the calculations.
- G. Numerical calculations shall clearly indicate type of measurement unit used.
- H. Identify results and conclusions.
- I. Calculations shall be neat, orderly, and legible.

2.6 When computer programs are used to perform calculations, the following information shall accompany the calculation, including the following:

- A. Program Name.
- B. Program Abstract.
- C. Program Purpose and Applications.
- D. Complete descriptions of assumptions, capabilities and limitations.
- E. Instructions for preparing problem data.
- F. Instructions for problem execution.
- G. List (and explanation) of program acronyms and error messages.
- H. Description of deficiencies or uncorrected errors.
- I. Description of output options and interpretations.

- J. Sample problem(s), illustrating all input and output options and hardware execution statements. Typically, these problems shall be verified problems.
  - K. Computer printout of all supporting calculations.
  - L. The "User's Manual" shall also include a certification section. The certification section shall describe the methods and how they cover the permitted options and uses of the program.
- 2.7 Drawings shall be drawn, to scale, showing the location and relationship of proposed adjacent construction to existing MTA structures at various stages of construction along the entire adjacent alignment. The stresses and deflections induced in the existing MTA structures should be provided.
- 2.8 The short-term and long-term effects of the new loading due to the adjacent construction on the MTA structures shall be provided. The soil parameters and other pertinent geotechnical criteria contained in existing contract documents for the affected structure, plus any additional conditions shall be used to analyze the existing MTA structures.
- 2.9 MTA structures shall be analyzed for differential pressure loadings transferred from the adjacent construction site.

### 3.0 MECHANICAL CRITERIA

- 3.1 Existing services to MTA facilities, including chilled water and condenser water piping, potable and fire water, storm and sanitary sewer, piping, are not to be used, interrupted nor disturbed without written approval of MTA.
- 3.2 Surface openings of ventilation shafts, emergency exits serving MTA underground facilities, and ventilation system openings of surface and elevated facilities are not to be blocked or restricted in any manner. Construction dust shall be prevented from entering MTA facilities.
- 3.3 Hot or foul air, fumes, smoke, steam, etc., from adjacent new or temporary facilities are not to be discharged within 40 feet of existing MTA ventilation system intake shafts, station entrances or portals. Tunnel ventilation shafts are both intake and discharge structures.
- 3.4 Clear access for the fire department to the MTA fire department connections shall be maintained at all times. Construction signs shall be provided to identify the location of MTA fire department connections. No interruption to fire protection water service will be permitted at any time.
- 3.5 Modifications to existing MTA mechanical systems and equipment, including ventilation shafts, required by new connections into the MTA System, shall only be permitted with prior review and approval by MTA. If changes are made to MTA property as built drawings shall be provided reflecting these changes.

At the option of MTA, the adjacent construction party shall be required to perform the field tests necessary to verify the adequacy of the modified system and the equipment performance. This verification shall be performed within an agreed time period jointly determined by MTA and the Party on a case by case basis. Where a modification is approved, the party shall be held responsible to maintain original operating capacity of the equipment and the system impacted by the modification.

## 4.0 OPERATIONAL REQUIREMENTS

### 4.1 GENERAL

- A. Normal construction practices must be augmented to insure adequate safety for the general public entering Metro Stations and riding on Metro Trains and Buses. Design of a building, structure, or facility shall take into account the special safety considerations required for the construction of the facility next to or around an operating transit system.
- B. Projects which require working over or adjacent to MTA station entrances shall develop their construction procedures and sequences of work to meet the following minimum requirements:
  - 1. Construction operations shall be planned, scheduled and carried out in a way that will afford the Metro patrons and the general public a clean, safe and orderly access and egress to the station entrance during revenue hours.
  - 2. Construction activities which involve swinging a crane and suspended loads over pedestrian areas, MTA station entrances and escalators, tracks or Metro bus passenger areas shall not be performed during revenue hours. Specific periods or hours shall be granted on a case-by-case basis.
  - 3. All cranes must be stored and secured facing away from energized tracks, when appropriate.
  - 4. All activity must be coordinated through the MTA Track Allocation process in advance of work activity.

### 4.2 OVERHEAD PROTECTION - Station Entrances

- A. Overhead protection from falling objects shall be provided over MTA facilities whenever there is possibility, due to the nature of a construction operation, that an object could fall in or around MTA station entrances, bus stops, elevators, or areas designed for public access to MTA facilities. Erection of the overhead protection for these areas shall be done during MTA non-revenue hours.
  - 1. The design live load for all overhead protection shall be 150 pounds per square foot minimum. The design wind load on the temporary structures shall be 20 pounds per square foot, on the windward and leeward sides of the structure.
  - 2. The overhead protection shall be constructed of fire rated materials. Materials and equipment shall not be stored on the completed shield. The roof of the shield shall be constructed and maintained watertight.
- B. Lighting in public areas and around affected MTA facilities shall be provided under the overhead protection to maintain a minimum level of twenty-five (25) footcandles at the escalator treads or at the walking surface. The temporary lighting shall be maintained by the Party.

- C. Wooden construction fencing shall be installed at the boundary of the areas with public access. The fencing shall be at least eight-feet high, and shall meet all applicable code requirements.
- D. An unrestricted public access path shall be provided at the upper landing of the entrance escalator-way in accordance with the following:
  - 1. A vertical clearance between the walking surface and the lowest projection of the shield shall be 8'-0".
  - 2. A clear pedestrian runoff area extending beyond the escalator newel shall be provided, the least dimension of which shall be twenty (20) feet.
  - 3. A fifteen (15) foot wide strip (other than the sidewalk) shall be maintained on the side of the escalator for circulation when the escalator is pointed away from a street corner.
  - 4. A clear path from any MTA emergency exit to the public street shall be maintained at all times.
- E. Temporary sidewalks or pedestrian ways, which will be in use more than 10 days, shall be constructed of four (4") inch thick Portland cement concrete or four (4") inches of asphaltic concrete placed and finished by a machine.

#### 4.3 OVERHEAD PROTECTION - Operating Right-of-Way Trackage

- A. MTA Rail Operations Control Center shall be informed of any intent to work above, on, or under the MTA right-of-way. Crews shall be trained and special flagging operations shall be directed by MTA Rail Operations Control Center. The party shall provide competent persons to serve as Flaggers. These Flaggers shall be trained and certified by MTA Rail Operations prior to any work commencing. All costs incurred by MTA shall be paid by the party.
- B. A construction project that will require work over, under or adjacent to the at grade and aerial MTA right-of-way should be aware that the operation of machinery, construction of scaffolding or any operation hazardous to the operation of the MTA facility shall require that the work be done during non-revenue hours and authorized through the MTA Track Allocation process.
- C. MTA flagmen or inspectors from MTA Operations shall observe all augering, pile driving or other work that is judged to be hazardous. Costs associated with the flagman or inspector shall be borne by the Party.
- D. The party shall request access rights or track rights to perform work during non-revenue hours. The request shall be made through the MTA Track Allocation process.-

#### 4.4 OTHER METRO FACILITIES

- A. Access and egress from the public streets to fan shafts, vent shafts and emergency exits must be maintained at all times. The shafts shall be protected from dust and debris. See

Exhibit A for details.

- B. Any excavation in the vicinity of MTA power lines feeding the Metro System shall be through hand excavation and only after authorization has been obtained through the MTA Track Allocation process. MTA Rail Operations Control Center shall be informed before any operations commences near the MTA power system.
- C. Flammable liquids shall not to be stored over or within 25 feet horizontally of MTA underground facilities. If installed within 25 to 100 feet horizontally of the structure, protective encasement of the tanks shall be required in accordance with NFPA STD 130. Existing underground tanks located within 100 feet horizontally of MTA facilities and scheduled to be abandoned are to be disposed of in accordance with Appendix C of NFPA STD 130. NFPA STD 130 shall also be applied to the construction of new fuel tanks.
- D. Isolation of MTA Facilities from Blast

Subsurface areas of new adjacent private buildings where the public has access or that cannot be guaranteed as a secure area, such as parking garages and commercial storage and warehousing, will be treated as areas of potential explosion. NFPA 130, Standard for Fixed Guideway Transit Systems, life safety separation criteria will be applied that assumes such spaces contain Class I flammable, or Class II or Class III Combustible liquids. For structural and other considerations, isolation for blast will be treated the same as seismic separation, and the more restrictive shall be applied.

- E. **Any proposed facility that is located within 20 feet radius of an existing Metro facility will require a blast and explosion study and recommendations to be conducted by a specialist who is specialized in the area of blast force attenuation. This study must assess the effect that an explosion in the proposed non-Metro facility will have on the adjacent Metro facility and provide recommendations to prevent any catastrophic damage to the existing Metro facility. Metro must approve the qualifications of the proposed specialist prior to commencement of any work on this specialized study.**

#### 4.5 SAFETY REGULATIONS

- A. Comply with Cal/OSHA Compressed Air Safety Orders Title 8, Division 1, Chapter 4, Subchapter 3. Comply with California Code of Regulations Title 8, Title 29 Code of Federal Regulations; and/or the Construction Safety and Health Manual ( Part F ) of the contract whichever is most stringent in regulating the safety conditions to be maintained in the work environment as determined by the Authority. The Party recognizes that government promulgated safety regulations are minimum standards and that additional safeguards may be required
- B. Comply with the requirements of Chemical Hazards Safety and Health Plan, (per 29 CFR 1910.120 entitled, ( Hazardous Waste Operations and Emergency Response) with respect to the handling of hazardous or contaminated wastes and mandated specialty raining and health screening.
- C. Party and contractor personnel while within the operating MTA right-of-way shall

coordinate all safety rules and procedures with MTA Rail Operations Control Center.-

- D. When support functions and electrical power outages are required, the approval **MUST** be obtained through the MTA Track Allocation procedure. Approval of the support functions and power outages must be obtained in writing prior to shutdown.

## **5.0 CORROSION**

### **5.1 STRAY CURRENT PROTECTION**

- A. Because stray currents may be present in the area of the project, the Party shall investigate the site for stray currents and provide the means for mitigation when warranted.
- B. Installers of facilities that will require a Cathodic Protection (CP) system must coordinate their CP proposals with MTA. Inquiries shall be routed to the Manager, Third Party Administration.
- C. The Party is responsible for damage caused by its contractors to MTA corrosion test facilities in public right-of-way.

**End of Section**

# Los Angeles Unified School District

## Office of Environmental Health and Safety

**RAMON C. CORTINES**  
*Superintendent of Schools*

**THELMA MELÉNDEZ, PH.D.**  
*Chief Executive Officer, Office of Educational Services*

**ROBERT LAUGHTON**  
*Director, Environmental Health and Safety*

**CARLOS A. TORRES**  
*Deputy Director, Environmental Health and Safety*

December 24, 2015

William Lamborn  
Major Projects and Environmental Analysis Section  
Department of City Planning (City)  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

*Sent via electronic mail*

**SUBJECT: 6220 West Yucca Project (ENV-2014-4706-EIR)**

Dear William Lamborn:

This letter is submitted on behalf of the Los Angeles Unified School District (LAUSD) regarding the proposed 6220 West Yucca Project (Project). The Project site is located at: 1756, 1760 North Argyle Avenue; 6210-6224 West Yucca Street; and 1765, 1771, 1777, and 1779 North Vista Del Mar Avenue in Los Angeles. The Project includes development of 191 multi-family residential units and would require the demolition of all existing on-site uses and redevelopment of the site with residential, hotel, and commercial/restaurant uses.

As noted in the City's Initial Study for the Project, LAUSD's Cheremoya Avenue Elementary (Cheremoya Avenue ES) is located within 0.25 mile of the Project site. Based on the extent and location of the Project, LAUSD requests that the City consider Cheremoya Avenue ES in its assessment of potential air quality, public services (as it relates to a potential increase in the student population at Cheremoya Avenue ES as well as other LAUSD campuses), and transportation/traffic impacts associated with the Project in the Environmental Impact Report. LAUSD requests that if impacts remain after implementation of the appropriate mitigation measures, the City shall develop new, feasible, and appropriate measures in conjunction with LAUSD to effectively mitigate impacts at Cheremoya Avenue ES.

Information regarding Cheremoya Avenue ES and LAUSD's other campuses is available on LAUSD's Find A School website at: <http://notebook.lausd.net/schoolsearch/search.jsp>. Information related to school developer fees can be obtained by contacting the LAUSD Developer Fee Office at (213) 241-0715.

LAUSD's charge is to protect the health and safety of students, faculty, staff, and the integrity of the learning environment. This comment letter identifies several potential environmental impacts related to the Project that have the potential to impact the welfare of the students, faculty, and staff at LAUSD's campuses. If additional issues are identified by LAUSD, we will bring them to the attention of the City.

Thank you for your attention to this matter. Please feel free to contact me at (213) 241-3417 should you require additional information.

Sincerely,



Eimon Smith  
CEQA Project Manager/Contract Professional

c: Stephen Salva, Principal, Cheremoya Avenue Elementary School

**333 South Beaudry Avenue, 21<sup>st</sup> Floor, Los Angeles, CA 90017 • Telephone (213) 241-3199 • Fax (213) 241-6816**

*The Office of Environmental Health and Safety is dedicated to providing a safe and healthy environment for the students and employees of the Los Angeles Unified School District.*



**HOLLYWOOD HERITAGE, INC.**  
**P.O. Box 2586**  
**Hollywood, CA 90078**  
**(323) 874-4005 • FAX (323) 465-5993**

December 28, 2015

**Submitted via email:**

Mr. William Lamborn  
Major Projects and Environmental Analysis Section  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012  
Fax: (213) 978-1343  
Email: [william.lamborn@lacity.org](mailto:william.lamborn@lacity.org)

**6220 West Yucca Project; ENV-2014-4706-EIR**

Dear Mr. Lamborn,

The Board of Directors of Hollywood Heritage, its Preservation Issues Committee and its members, thank you for the opportunity to review and comment on the 6220 West Yucca Project. Representatives of Hollywood Heritage have reviewed the Notice of Preparation. Hollywood Heritage is very concerned about this project's scope and impact on surrounding identified historic resources. In addition to concerns about historic resources, we are again alarmed that the amount of requested density far exceeds the current community plan.

**Historic resources.** The project site contains two residences on Vista Del Mar that have long been evaluated as part of an identified historic residential district. Removal of these contributing structures will irrevocably damage the integrity of the district, and in all likelihood cause the district to no longer be viable. The district, first identified in the 1978 survey and verified by several surveys in the intervening years, has sustained some erosion from the project to the south, but at this time is still viable. Hollywood Heritage has mapped contributing features and potential boundaries, including 1771 and 1765 North Vista Del Mar Avenue. The buildings form a unified streetscape along this block of Vista Del Mar.

The two mid-century apartment buildings will need to be further analyzed in the EIR as well. Hollywood does not have a large collection of these courtyard structures, and we are concerned that the entire population of this type of resource is small. The results of both the most recent CRA survey and SurveyLA should be consulted for this portion of Hollywood in order to determine significance.

Despite the loss of the Little Country Church building, the property to the south is a listed Historic Cultural Monument and contains character-defining landscape features valuable to the Public and of specific interest to Hollywood Heritage. This historic site also abuts the



Vista Del Mar/Carlos district, and could be considered a feature of that district as well as having its own status.

**Density.** Hollywood Heritage is further concerned by the proposed increase in FAR by 35%. The “D” conditions, which are attached to the zone designation, reflect specific planning intent and specific requirements for infrastructure calculation and provision from the Hollywood Community Plan and Hollywood Redevelopment Plan. At the time the Hollywood Redevelopment Plan was being adopted and initiated, all concerned acknowledged that the Community Plan map was at best a generalized concept, lacking needed specificity in critical areas that would have to be detailed at a later date. There was acute and across-the-board recognition that the scale and character of historic buildings were ill-served by the Redevelopment Plan designation of Regional Center. The “D” condition was consciously put on all the core district properties. This was specifically to ensure that no development would take place until the Redevelopment Agency completed its Urban Design Plan—with design review guidelines, limitations in demolitions, and restrictions on new construction—and its Parking and Transportation Plan. For these reasons, Hollywood Heritage expects full evaluation of the “D” conditions and effects of added density in the EIR.

**EIR process.** Hollywood Heritage expects to see one or more alternatives which avoid the impacts to the Vista Del Mar historic district and the demolition of 1771 and 1765 North Vista Del Mar Avenue. Mitigation measures could include listing and rehab of the district, acquisition of the Little Country Church property as historic open space, design guidelines which respect the historic character of the neighborhood to the east, etc.

We are aware that the property is located at an intersection where there has been intense development activity. Projects on two other corners have been approved. The cumulative effect of these projects on existing neighborhoods to the north and east should be evaluated.

**About Hollywood Heritage.** For three decades Hollywood Heritage has been an advocate of the preservation and protection of Hollywood’s historic resources. We support the goal of preserving what is most significant in Hollywood, while encouraging responsible new and infill development. Our organization has nominated many of the current Historic Cultural Monuments, listed the Hollywood Boulevard Commercial and Entertainment District in the National Register of Historic Places at the national level of significance, provided technical assistance to developers and owners of significant properties, and participated in public policy discussions through the formulation of the Community Redevelopment Plan of 1986 and subsequent urban design plans, specific plans and in the property entitlement discussion involving historic resources. In addition, we support historic neighborhoods in their efforts to retain the character of their residential neighborhoods and adjacent commercial development. These efforts have resulted in the rehabilitation of significant landmarks and districts in Hollywood.

Hollywood Heritage appreciates the efforts of the developer and will work diligently with them to ensure the preservation and protection of all of Hollywood’s historic resources. Please feel free to contact us at (323) 874-4005 should you have any questions.

Sincerely,  
Hollywood Heritage Preservation Issues Committee

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 897-9140  
FAX (213) 897-1337  
www.dot.ca.gov



*Serious drought.  
Help save water!*

December 21, 2015

Mr. William Lamborn  
City of Los Angeles  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RE: 6220 West Yucca Project  
SCH # 2015111073  
IGR/CEQA No. 151145AL-NOP  
Vic. LA-101/PM 7.058

Dear Mr. Lamborn:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project is to demolish existing uses (44 residential units) and to develop 191 multi-family residential units, 260 hotel rooms, and 6,980 square feet of commercial/restaurants uses with a total of 372,450 square feet of floor area. The 1.16-acre project site is located on the south side of west Yucca Street between Argyle Avenue and North Vista Del Mar Avenue in the Hollywood community of the City of Los Angeles. The project is one block away from US-101.

As a reminder, when using Freeway Impact Analysis Screening Criteria, per Agreement between City of Los Angeles and Caltrans District 7 on Freeway Impact Analysis Procedures (Agreement), the 850 vehicle/hour/lane for the off-ramp capacity in the renewal agreement should be used.

After the screening criteria has been applied, if it is determined that a traffic analysis is necessary to evaluate the impacts of the project on State transportation facilities, it should be prepared prior to preparing the Draft Environmental Impact Report (DEIR). Please confirm the identified study/screening locations for the State facilities with Caltrans prior to preparing the Environmental Impact Report (EIR). The City should refer the project's traffic consultant to Caltrans' traffic study guide Website:

[http://www.dot.ca.gov/hq/tpp/offices/ocp/igr\\_ceqa\\_files/tisguide.pdf](http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf)

When preparing the traffic study, please include the following elements:

1. Presentations of assumptions and methods used to develop trip generation, trip



distribution, choice of travel mode, and assignments of trips to freeway US-101 from Hollywood Blvd. to the Cahuenga Blvd. (The calculated LOS should be verified using PEMS data) undercrossing, immediate and alternative on/off ramp accesses with peak hour LOS for the following ramps:

- a. NB/SB on/off ramps to Hollywood Blvd.
  - b. NB/SB off-ramps to Gower St.
  - c. NB/SB on-ramps from Argyle Ave.
  - d. SB off-ramp to Vine/Franklin Ave
  - e. NB/SB on/off-ramps to Cahuenga Blvd.
2. Currently, the US-101 is operating at LOS E or F. Caltrans is concerned that additional traffic exiting the freeway may potentially back into the mainline through lanes if the queue exceeds the storage capacity on the off ramps. A queuing analysis should be performed using HCM methodology. The capacity of the off-ramp should be calculated by the actual length of the off-ramp between the terminuses to the gore point with some safety factor. The queue length should be calculated from the traffic counts, actual signal timing and the percent of truck assignments to the rap with a passenger car equivalent factor of 3.0 (worst case scenario). The analyzed result may need to be calibrated with actual signal timing when necessary.
  - 3.
  4. Analysis of ADT, AM and PM peak-hour volumes for both the existing and future conditions in the affected area. Future conditions should include build-out of all projects and any plan-horizon years.
  5. Analysis should include existing traffic, traffic generated by the project, cumulative traffic generated from all specific approved developments in the area, and traffic growth other than from the project and developments.
  6. A discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. Any mitigation involving transit or Transportation Demand Management (TDM) should be justified and the results conservatively estimated.
  7. Fair share contributions toward pre-established or future improvements on the State Highway System is considered to be an acceptable form of mitigation. Please use the following ratio when estimating project equitable share responsibility: additional traffic volume due to project implementation is divided by the total increase in the traffic volume (see Appendix "B" of the Guide).

Please note that for purposes of determining project share of costs, the number of trips from the project on each traveling segment or element is estimated in the context of forecasted traffic volumes, which include build-out of all approved projects, project that have not yet been approved, and other sources of growth.

Caltrans staff is available to consult with the City and traffic consultant. We look forward to reviewing the traffic study and expect to receive a copy from the State Clearinghouse when the DEIR is completed. If you would like to expedite the review process or receive early feedback from the Caltrans please send a copy of the DEIR directly to our office.

If you have any questions or would like to schedule a meeting, please feel free to contact Mr. Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 151145AL.

Sincerely,



DIANNA WATSON  
IGR/CEQA Branch Chief  
Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse



**South Coast  
Air Quality Management District**  
21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

December 9, 2015

William Lamborn  
Major Projects and Environmental Analysis Section  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

**RECEIVED**  
CITY OF LOS ANGELES

**DEC 15 2015**

ENVIRONMENTAL  
UNIT

**Notice of Preparation of a CEQA Document for the  
6220 West Yucca (ENV-2014-4706)**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft CEQA document. Please send the SCAQMD a copy of the CEQA document upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

**Air Quality Analysis**

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). SCAQMD staff also recommends that the lead agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is



recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

### **Mitigation Measures**

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf?sfvrsn=4>.

### **Data Sources**

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at [Jwong1@aqmd.gov](mailto:Jwong1@aqmd.gov) or call me at (909) 396-3176.

Sincerely,

*Jillian Wong*

Jillian Wong, Ph.D.

Program Supervisor

Planning, Rule Development & Area Sources

# **Individual Comment Letters**

## ENVIRONMENTAL ISSUES & IMPACTS

What key issues or potential impacts of concern should be analyzed in the Environmental Impact Report?

- ☐ Aesthetics
- ☐ Agriculture and Forest Resources
- ☐ Air Quality
- ☐ Biological Resources
- ☐ Cultural Resources
- ☐ Geology and Soils
- ☐ Greenhouse Gas Emissions
- ☐ Hazards and Hazardous Materials
- ☐ Hydrology/Water Quality
- ☒ Land Use and Planning
- ☐ Mineral Resources
- ☒ Noise
- ☒ Population and Housing
- ☐ Public Services
- ☐ Recreation
- ☐ Traffic/Transportation
- ☐ Utilities/Service Systems

**Note:** Any identifying information provided will become part of the public record and, as such, must be released to any individual upon request.

## Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

My name is Wilbert Roberts, I live at 6218 Yucca I need my home. My girlfriend and I are starting a family and do not want to move. It's unfair and wrong to kick us out of our home just to build some hotel. Please care about the people who need and call this area home.

Thank you

Wilbert Roberts

### CONTACT INFORMATION (Optional, please print clearly)

Name: Wilbert Roberts / Tracy Cull Representing Agency or Organization: \_\_\_\_\_

Address: 6218 Yucca Blvd 105 Angeles City/State/Zip: LA, CA 90028



Donald Rhine  
2244 North Gower Street  
Los Angeles, CA 90068

Hello, I am a resident of Gower Street and have many friends living in the Yucca-Argyle Apartments. In 2014 the City of Los Angeles lost 1214 rent-stabilized apartmetns due to Ellis Act evictions. In the first five months of this year (2015) we lost over 500. The Yucca-Argyle development will result in the loss of 45 rent-stabilized units. Most of the current tenants who have lived in the buildings for 5, 10 20, 50 years will not qualify for affordable housing under the current definition because they either make too much OR too little. Plus the alocation of affordable housing is an open process and will do nothing to provide guaranteed right of return to the 45 households. Just last month Councilmember Huizar worked with a developer in Boyle Heights to guarantee right of return to all tenants being displaced from a development project at 1st and Soto. Claims that there are state laws preventing the right of return are actually not true. There are ways around those constraints and tenants CAN be guaranteed right of return under their existing leave agreement and at the price they are paying for rent-stabilized housing. If the Yucca-Argyle development does NOT guarantee housing for the current tenants at the price and conditions of tenancy they have presently, then the development is CONTRIBUTING to the housing crisis in Los Angeles. I am sick and tired of developments that are creating this crisis. Champion should take a lead and guarantee housing for the current tenants. Do the right thing. Make yourself a progressive example. Affordable without guaranteed right of return is actually contributing to the crisis. There has to be another way. For the sake of my community, my friends, and my city. Thank you.

Vilia, Romas and Marie Zemaitaitis  
2227 Meadow Valley Terrace  
Los Angeles, CA 90030

The Vista Del Mar Carlos Neighborhood Historic District is a small, low-scale residential district of single family residences, duplexes and triplexes in the heart of Hollywood, zoned R3 with a height overlay, blocks from the Pantages Theater and Capitol Records. The district is listed on the State's Historical Register and no structures are greater than two stories. Furthermore, Vista Del Mar is a narrow street with no on-street parking and with a somewhat significant down-slope from Yucca to Don Carlos.

As adjacent property owners on Vista Del Mar, we are very concerned with the Aesthetic, Air Quality, Cultural Resources, Land Use, Noise, and Traffic & Transportation impacts of the proposed 32-story, hotel/multi-family residential project. We look forward to seeing the shade and shadow studies, the historic report, the traffic study, and other documents being prepared for the EIR.

We ask that the developer provide the following additional perspective renderings: eye level perspective drawing/rendering looking west on Yucca facing the north-east corner of the project, an eye level rendering looking north-west at the project from the Vista Del Mar and Don Carlos intersection, and another eye level rendering mid-block on Vista Del Mar looking towards the project site. Such renderings are crucial in providing accurate representation of perceived visual impacts of the project on the surrounding low-scale residential neighborhood adjacent to the project site.

Thank you.

Pedro Garcia

, CA

study how meny people have beeng treaded for cancer in hospitals around hollywood and vine st do to bad air quillity for the past 10 years thunk you

Sylvie Shain  
PO Box 995  
Los Angeles, CA 90078

I am EXTREMELY concerned about the loss of more RSO-housing, which represents scaled affordable workforce housing at rent-levels that vary and are affordable for a variety of income levels. This projects is removing a total of 44 RSO units, to replace them by 39 "affordable" units-a net loss. Many of those being displaced would not meet the minimum income thresholds for the "affordable" units. Worse, is that those being impacted are not even given a guaranteed right-of return.

This project is completely out of scale for this area and does give the community the value-added that it desperately needs in the form of appropriate housing, while it seeks to take more than it gives. Without guaranteed right-of-return for the residents of these buildings, some of whom have lived in these properties for 50 years, this project only exacerbates a workforce housing crisis that is reaching epidemic proportions.

I have other concerns with regards to infrastructure and the appropriateness of mixed use at this site but the cumulative impacts of displacement is currently my greatest concern, one that makes it difficult to see past to investigate the project further.

Kindly go back to the drawing board and re-think this project.

Thank you.

----- Forwarded message -----

From: **Tracy Jeanne Rosenthal** <[tracyjeannerosenthal@gmail.com](mailto:tracyjeannerosenthal@gmail.com)>

Date: Fri, Dec 18, 2015 at 10:31 AM

Subject: STOP ELIS EVICTIONS

To: [william.lamborn@lacity.org](mailto:william.lamborn@lacity.org)

My name is Tracy and I am a friend of the Yucca-Argyle Apartments.

I stand with the residents of the Yucca-Argyle Apartments and demand no displacement, no development. Los Angeles is in the midst of a historic housing crisis with 13,000 people in the County going homeless every month. In 2014 the city lost 1,214 rent-stabilized apartments due to the Ellis Act. We lost over five-hundred rent-stabilized apartments due to the Ellis Act in the first five months of 2015. We must stop proliferating the housing crisis and stop destroying rent-stabilized apartments.

The developer of the Yucca-Argyle project has proposed to include only twenty "affordable" units in the development. These units will be available through a lottery system open to anyone who qualifies. We know that the displaced tenants will have no guarantee of securing one of the twenty "affordable" units. We also know that the definition of affordability used by the city will exclude the majority of the 45 households at risk of displacement.

We demand the City of Los Angeles reject the new development on existing housing. The new development not only displaces 45 existing households, but it will also increase automobile traffic on an already accident-prone intersection of Argyle and Yucca, it will increase noise for existing residents during and post construction, and it will induce the issues of building a large housing complex onto an existing live earthquake faultily. With a nearby elementary school and renowned school of dance for youth, traffic is a major point of danger for children walking to and from school and classes on a daily basis. In the event that the development does pass, the existing tenants of the perfectly well maintained Yucca-Argyle Apartment building demand guaranteed right of return for all tenants at the exact same terms of their current tenancy and with no obstacles - no applications, no background checks, no open lottery, and no credit checks.

In November 2015, L.A. City Councilmember Huizar backed the demands of residents of the 1st and Soto apartments in Boyle Heights who were also facing eviction to make way for a development. Negotiating with the developer and with backing from the Councilman, the residents won guaranteed right of return for all current tenants at the existing terms of tenancy and with no obstacles. We demand at least the same for the 45 households in the Yucca-Argyle Apartments.

The tenants of Yucca-Argyle are part of the environment of Hollywood. Displacement will have a disastrous impact on peoples' lives and destroy the community. Stop destroying rent-stabilized housing in Los Angeles. Stop proliferating the housing crisis.

Sincerely,  
Tracy Jeanne Rosenthal

----- Forwarded message -----

From: **Scotty Tee** <[scotty\\_tee@me.com](mailto:scotty_tee@me.com)>

Date: Fri, Dec 18, 2015 at 12:51 AM

Subject: A concerned taxpayer

To: [william.lamborn@lacity.org](mailto:william.lamborn@lacity.org)

My name is Bradley Scott Telling and I am a tenant of the Yucca-Argyle Apartments.

I stand with the residents of the Yucca-Argyle Apartments and demand no displacement, no development. Los Angeles is in the midst of a historic housing crisis with 13,000 people in the County going homeless every month. In 2014 the city lost 1,214 rent-stabilized apartments due to the Ellis Act. We lost over five-hundred rent-stabilized apartments due to the Ellis Act in the first five months of 2015. We must stop proliferating the housing crisis and stop destroying rent-stabilized apartments. My major concern is not for myself, but for the many residents of these apartments that are on a fixed income and their housing would be seriously jeopardized by this project. I continuously look and watch my neighbors that would more than likely become homeless if this project goes through.

The developer of the Yucca-Argyle project has proposed to include only twenty “affordable” units in the development. These units will be available through a lottery system open to anyone who qualifies. We know that the displaced tenants will have no guarantee of securing one of the twenty “affordable” units. We also know that the definition of affordability used by the city will exclude the majority of the 45 households at risk of displacement.

We demand and insist the City of Los Angeles reject the new development on existing housing. The new development not only displaces 45 existing households, but it will also increase automobile traffic on an already accident-prone intersection of Argyle and Yucca, it will increase noise for existing residents during and post construction, and it will induce the issues of building a large housing complex onto an existing live earthquake faultily. With a nearby elementary school and renowned school of dance for youth, traffic is a major point of danger for children walking to and from school and classes on a daily basis. In the event that the development does pass, the existing tenants of the perfectly well maintained Yucca-Argyle Apartment building demand guaranteed right of return for all tenants at the exact same terms of their current tenancy and with no obstacles - no applications, no background checks, no open lottery, and no credit checks.

In November 2015, L.A. City Councilmember Huizar backed the demands of residents of the 1st and Soto apartments in Boyle Heights who were also facing eviction to make way for a development. Negotiating with the developer and with backing from the Councilman, the residents won guaranteed right of return for all current tenants at the existing terms of tenancy and with no obstacles. We demand at least the same for the 45 households in the Yucca-Argyle Apartments.

The tenants of Yucca-Argyle are part of the environment of Hollywood. Displacement will have a disastrous impact on peoples' lives and destroy the community. Stop destroying rent-stabilized housing in Los Angeles. Stop proliferating the housing crisis.

Thank you for taking the time and considering my concerns.

Bradley Scott Telling  
Resident  
6220 Yucca st Apt C  
Los Angeles CA 90028

----- Forwarded message -----

From: **Sasha Ali** <[semi.divina@gmail.com](mailto:semi.divina@gmail.com)>

Date: Fri, Dec 18, 2015 at 12:15 PM

Subject: Re: ENV-2014-4706-EIR

To: [william.lamborn@lacity.org](mailto:william.lamborn@lacity.org)

Dear Mr. Lamborn,

My name is Sasha Ali, and I am a tenant of the Yucca-Argyle Apartments. We have recently learned that Champion Real Estate Company has submitted an application to turn our beautiful homes into a large multi-use complex.

I stand with the rest of the tenants of the Yucca-Argyle Apartments and demand no displacement, no development. Los Angeles is in the midst of a historic housing crisis with 13,000 people in the County going homeless every month. In 2014 the city lost 1,214 rent-stabilized apartments due to the Ellis Act. We lost over five-hundred rent-stabilized apartments due to the Ellis Act in the first five months of 2015. We must stop proliferating the housing crisis and stop destroying rent-stabilized apartments.

The developer of the Yucca-Argyle project has proposed to include only twenty “affordable” units in the development. These units will be available through a lottery system open to anyone who qualifies. We know that the displaced tenants will have no guarantee of securing one of the twenty “affordable” units. We also know that the definition of affordability used by the city will exclude the majority of the 45 households at risk of displacement.

We demand the City of Los Angeles reject the new development on existing housing. The new development not only displaces 45 existing households, but it will also increase automobile traffic on an already accident-prone intersection of Argyle and Yucca, it will increase noise for existing residents during and post construction, and it will induce the issues of building a large housing complex onto an existing live earthquake faultline. With a nearby elementary school and renowned school of dance for youth, traffic is a major point of danger for children walking to and from school and classes on a daily basis. In the event that the development does pass, the existing tenants of the perfectly well-maintained Yucca-Argyle Apartment building demand guaranteed right of return for all tenants at the exact same terms of their current tenancy and with no obstacles - no applications, no background checks, no open lottery, and no credit checks.

In November 2015, L.A. City Councilmember Huizar backed the demands of residents of the 1st and Soto apartments in Boyle Heights who were also facing eviction to make way for a development. Negotiating with the developer and with backing from the Councilman, the residents won guaranteed right of return for all current tenants at the existing terms of tenancy and with no obstacles. We demand at least the same for the 45 households in the Yucca-Argyle Apartments.

The tenants of Yucca-Argyle are part of the environment of Hollywood. Displacement will have a disastrous impact on peoples’ lives and destroy the community. PLEASE stop destroying rent-stabilized housing in Los Angeles. Stop proliferating the housing crisis.

With warmest regards,  
Sasha Ali



----- Forwarded message -----

From: **Betty Marin** <[betty.marin@gmail.com](mailto:betty.marin@gmail.com)>

Date: Sat, Dec 26, 2015 at 3:47 PM

Subject: Yucca-Argyle Apartments.

To: [william.lamborn@lacity.org](mailto:william.lamborn@lacity.org)

My name is Betty Marin and I am a friend of the Yucca-Argyle Apartments.

I stand with the residents of the Yucca-Argyle Apartments and demand no displacement, no development. Los Angeles is in the midst of a historic housing crisis with 13,000 people in the County going homeless every month. In 2014 the city lost 1,214 rent-stabilized apartments due to the Ellis Act. We lost over five-hundred rent-stabilized apartments due to the Ellis Act in the first five months of 2015. We must stop proliferating the housing crisis and stop destroying rent-stabilized apartments.

The developer of the Yucca-Argyle project has proposed to include only twenty “affordable” units in the development. These units will be available through a lottery system open to anyone who qualifies. We know that the displaced tenants will have no guarantee of securing one of the twenty “affordable” units. We also know that the definition of affordability used by the city will exclude the majority of the 45 households at risk of displacement.

We demand the City of Los Angeles reject the new development on existing housing. The new development not only displaces 45 existing households, but it will also increase automobile traffic on an already accident-prone intersection of Argyle and Yucca, it will increase noise for existing residents during and post construction, and it will induce the issues of building a large housing complex onto an existing live earthquake faultily. With a nearby elementary school and renowned school of dance for youth, traffic is a major point of danger for children walking to and from school and classes on a daily basis. In the event that the development does pass, the existing tenants of the perfectly well maintained Yucca-Argyle Apartment building demand guaranteed right of return for all tenants at the exact same terms of their current tenancy and with no obstacles - no applications, no background checks, no open lottery, and no credit checks.

In November 2015, L.A. City Councilmember Huizar backed the demands of residents of the 1st and Soto apartments in Boyle Heights who were also facing eviction to make way for a development. Negotiating with the developer and with backing from the Councilman, the residents won guaranteed right of return for all current tenants at the existing terms of tenancy and with no obstacles. We demand at least the same for the 45 households in the Yucca-Argyle Apartments.

The tenants of Yucca-Argyle are part of the environment of Hollywood. Displacement will have a disastrous impact on peoples' lives and destroy the community. Stop destroying rent-stabilized housing in Los Angeles. Stop proliferating the housing crisis.

----- Forwarded message -----

From: **Shauna Johnson** <[ShaunaJohnson@mail.com](mailto:ShaunaJohnson@mail.com)>

Date: Sun, Dec 27, 2015 at 12:36 PM

Subject: ENV-2014-4706-EIR

To: [william.lamborn@lacity.org](mailto:william.lamborn@lacity.org)

Hello Mr. Lambord -

*My name is Shauna Johnson and I am a tenant of the Yucca-Argyle Apartments.*

I stand with the residents of the Yucca-Argyle Apartments and demand no displacement, no development. Los Angeles is in the midst of a historic housing crisis with 13,000 people in the County going homeless every month. In 2014 the city lost 1,214 rent-stabilized apartments due to the Ellis Act. We lost over five-hundred rent-stabilized apartments due to the Ellis Act in the first five months of 2015. We must stop proliferating the housing crisis and stop destroying rent-stabilized apartments.

The developer of the Yucca-Argyle project has proposed to include only twenty "affordable" units in the development. These units will be available through a lottery system open to anyone who qualifies. We know that the displaced tenants will have no guarantee of securing one of the twenty "affordable" units. We also know that the definition of affordability used by the city will exclude the majority of the 45 households at risk of displacement.

We demand the City of Los Angeles reject the new development on existing housing. The new development not only displaces 45 existing households, but it will also increase automobile traffic on an already accident-prone intersection of Argyle and Yucca, it will increase noise for existing residents during and post construction, and it will induce the issues of building a large housing complex onto an existing live earthquake faultily. With a nearby elementary school and renowned school of dance for youth, traffic is a major point of danger for children walking to and from school and classes on a daily basis. In the event that the development does pass, the existing tenants of the perfectly well maintained Yucca-Argyle Apartment building demand guaranteed right of return for all tenants at the exact same terms of their current tenancy and with no obstacles - no applications, no background checks, no open lottery, and no credit checks.

In November 2015, L.A. City Councilmember Huizar backed the demands of residents of the 1st and Soto apartments in Boyle Heights who were also facing eviction to make way for a development. Negotiating with the developer and with backing from the Councilman, the residents won guaranteed right of return for all current tenants at the existing terms of tenancy and with no obstacles. We demand at least the same for the 45 households in the Yucca-Argyle Apartments.

The tenants of Yucca-Argyle are part of the environment of Hollywood. Displacement will have a disastrous impact on peoples' lives and destroy the community. Stop destroying rent-stabilized housing in Los Angeles. Stop proliferating the housing crisis.

Thank you,

Shauna Johnson

----- Forwarded message -----

From: **J. Walton Senterfitt** <[wsenterfit@aol.com](mailto:wsenterfit@aol.com)>

Date: Mon, Dec 28, 2015 at 9:23 AM

Subject: ENV 2014 4706 EIR

To: [william.lamborn@lacity.org](mailto:william.lamborn@lacity.org)

William Lambord, Major Projects and Environmental Analysis Section

Re: ENV-2014-4706-EIR

Department of City Planning, City of Los Angeles

Dear Mr. Lambord:

My name is John Walton Senterfitt and I am a friend of the Yucca-Argyle Apartments residents. I am also a public health epidemiologist and ethicist in Los Angeles and a specialist in the impact of access to safe, affordable housing or the lack thereof on individual and community health. As a professional with the Department of Public Health, I believe that it is critically important to assess the impact on housing burden and affordability of any new development or city planning and land use policy, as housing (cost) burden has been extensively documented in our reports and the general literature to negatively impact longevity and health-related quality of life for directly affected individuals as well as communities as a whole.

I stand with the residents of the Yucca-Argyle Apartments and demand no displacement, no development. Los Angeles is in the midst of a historic housing crisis with 13,000 people in the County going homeless every month. In 2014 the city lost 1,214 rent-stabilized apartments due to the Ellis Act. We lost over five-hundred rent-stabilized apartments due to the Ellis Act in the first five months of 2015. We must stop proliferating the housing crisis and stop destroying rent-stabilized apartments.

The developer of the Yucca-Argyle project has proposed to include only twenty "affordable" units in the development. These units will be available through a lottery system open to anyone who qualifies. We know that the displaced tenants will have no guarantee of securing one of the twenty "affordable" units. We also know that the definition of affordability used by the city will exclude the majority of the 45 households at risk of displacement because their incomes will be too low to qualify.

We demand the City of Los Angeles reject this new development that destroys existing rent-stabilized housing without replacement. The new development not only displaces 45 existing households, but it will also increase automobile traffic on an already accident-prone intersection of Argyle and Yucca, it will increase noise for existing residents during and post construction, and it will induce the issues of building a large housing complex onto an existing live earthquake faultily. With a nearby elementary school and renowned school of dance for youth, traffic is a major point of danger for children walking to and from school and classes on a daily basis. In the event that the development does pass, the existing tenants of the perfectly well maintained Yucca-Argyle Apartment building demand guaranteed right of return for all tenants at the exact same terms of their current tenancy and with no obstacles - no applications, no background checks, no open lottery, and no credit checks.

In November 2015, L.A. City Councilmember Huizar backed the demands of residents of the 1st and Soto apartments in Boyle Heights who were also facing eviction to make way for a development. Negotiating with the developer and with backing from the Councilman, the residents won guaranteed right of return for all current tenants at the existing terms of tenancy and with no obstacles. We demand at least the same for the 45 households in the Yucca-Argyle Apartments.

The tenants of Yucca-Argyle are part of the environment of Hollywood. Displacement will have a disastrous impact on peoples' lives and destroy the community. Stop destroying rent-stabilized housing in Los Angeles. Stop proliferating the housing crisis.

I would be happy to supply more information and data about the impact of affordable, stable and safe housing on health.

Sincerely,

John Walton Senterfitt, RN, MPH, PhD  
1659 Rodney Drive  
Los Angeles, CA 90027

----- Forwarded message -----

From: **Sejal Patel** <[skpatel122@gmail.com](mailto:skpatel122@gmail.com)>

Date: Mon, Dec 28, 2015 at 9:41 AM

Subject: Re: ENV-2014-4706-EIR Initial Scoping Public Comment

To: [william.lamborn@lacity.org](mailto:william.lamborn@lacity.org)

Apologies, I failed to leave my contact information.

Thank you for your time and consideration to this grave matter,

Sejal Patel  
1756 Argyle Avenue  
Apt C  
Los Angeles, CA 90028

On Mon, Dec 28, 2015 at 9:39 AM, Sejal Patel <[skpatel122@gmail.com](mailto:skpatel122@gmail.com)> wrote:

Mr. William Lambord

Major Project and Environmental Analysis Section

Department of City Planning, Los Angeles City

Re: ENV-2014-4706-EIR

Dear Mr. Lambord,

My name is Sejal and I am a tenant of the Yucca-Argyle Apartments. Please do not approve the destruction of my beautiful apartment. Please do not approve the destruction of perfectly good, no - perfectly wonderful, rent controlled apartments in the urban center of Hollywood. Please come and visit our building and my apartment and see for yourself! My contact information is below. Call me anytime, you will be my honored guest!

I stand with the residents of the Yucca-Argyle Apartments and demand no displacement, no development. Los Angeles is in the midst of a historic housing crisis with 13,000 people in the County going homeless every month. In 2014 the city lost 1,214 rent-stabilized apartments due to the Ellis Act. We lost over five-hundred rent-stabilized apartments due to the Ellis Act in the first five months of 2015. We must stop proliferating the housing crisis and stop destroying rent-stabilized apartments.

The developer of the Yucca-Argyle project has proposed to include only twenty "affordable" units in the development. These units will be available through a lottery system open to anyone who qualifies. We know that the displaced tenants will have no guarantee of securing one of the twenty "affordable" units. We also know that the definition of affordability used by the city will exclude the majority of the 45 households at risk of displacement.

We demand the City of Los Angeles reject the new development on existing housing. The new development not only displaces 45 existing households, but it will also increase automobile traffic on an already accident-prone intersection of Argyle and Yucca, it will increase noise for existing residents during and post construction, and it will induce the issues of building a large housing complex onto an existing live earthquake faultily. With a nearby elementary school and renowned school of dance for youth, traffic is a major point of danger for children walking to and from school and classes on a daily basis. In the event that the development does pass, the existing tenants of the perfectly well maintained Yucca-Argyle Apartment building demand guaranteed right of return for all tenants at the exact same terms of their current tenancy and with no obstacles - no applications, no background checks, no open lottery, and no credit checks.

In November 2015, L.A. City Councilmember Huizar backed the demands of residents of the 1st and Soto apartments in Boyle Heights who were also facing eviction to make way for a development. Negotiating with the developer and with backing from the Councilman, the residents won guaranteed right of return for all current tenants at the existing terms of tenancy and with no obstacles. We demand at least the same for the 45 households in the Yucca-Argyle Apartments.

The tenants of Yucca-Argyle contribute to the City's prosperity and LA City should be proud to live amongst them, not have them displaced. A better byline should read "The Los Angeles Department of City Planning envisions a true urban center that supports affordable and luxury housing" not "The Los Angeles Department of City Planning supports driving out low income LA working residents to build multitudes of luxury condominiums, hotels and apartments. Displacement will have a disastrous impact on peoples' lives and destroy the community. Stop destroying rent-stabilized housing in Los Angeles. Stop proliferating the housing crisis.

----- Forwarded message -----

From: <[urquiza@thegeniusofwater.us](mailto:urquiza@thegeniusofwater.us)>

Date: Mon, Dec 28, 2015 at 12:01 PM

Subject: ENV-2014-4706-EIR yucca-argyle

To: [william.lamborn@lacity.org](mailto:william.lamborn@lacity.org)

as a photojournalist turned activists against gentrification i have witnessed too many displacements and homelessness from rent increases and poor land use and planning from developments in los angeles. it is the planning offices such as yours that projects such as these are supposed to be scrutinised for their merits. the dirty secret of this process is if the local councilman does not oppose a project, then the development moves forward despite the wishes of a community. here you have a clear resistance to this project from the community. your rejection of this project will bring developers back to the table and make this a more equitable development for the community. do the right thing.

i stand with the residents of the yucca-argyle apartments and demand no displacement, no development. los angeles is in the midst of a historic housing crisis with 13,000 people in the county going homeless every month. In 2014 the city lost 1,214 rent-stabilized apartments due to the ellis act. we lost over five-hundred rent-stabilized apartments due to the ellis act in the first five months of 2015. we must stop proliferating the housing crisis and stop destroying rent-stabilized apartments.

the developer of the yucca-argyle project has proposed to include only twenty "affordable" units in the development. these units will be available through a lottery system open to anyone who qualifies. we know that the displaced tenants will have no guarantee of securing one of the twenty "affordable" units. we also know that the definition of affordability used by the city will exclude the majority of the 45 households at risk of displacement.

we demand the city of los angeles reject the new development on existing housing. the new development not only displaces 45 existing households, but it will also increase automobile traffic on an already accident-prone intersection of argyle and yucca, it will increase noise for existing residents during and post construction, and it will induce the issues of building a large housing complex onto an existing live earthquake faultily. with a nearby elementary school and renowned school of dance for youth, traffic is a major point of danger for children walking to and from school and classes on a daily basis. in the event that the development does pass, the existing tenants of the perfectly well maintained yucca-argyle apartment building demand guaranteed right of return for all tenants at the exact same terms of their current tenancy and with no obstacles - no applications, no background checks, no open lottery, and no credit checks.

in november 2015, la city councilmember huizar backed the demands of residents of the 1st and soto apartments in boyle heights who were also facing eviction to make way for a development. negotiating with the developer and with backing from the councilman, the residents won guaranteed right of return for all current tenants at the existing terms of tenancy and with no obstacles. we demand at least the same for the 45 households in the yucca-argyle apartments.

the tenants of yucca-argyle are part of the environment of hollywood. displacement will have a disastrous impact on peoples' lives and destroy the community. stop destroying rent-stabilized housing in los angeles. stop proliferating the housing crisis.

thank you.

john U

urquiza!

[213.361.0017](http://213.361.0017)

[www.thegeniusofwater.us](http://www.thegeniusofwater.us)

[www.theironyandtheecstasy.me](http://www.theironyandtheecstasy.me)

[www.sinturistas.org](http://www.sinturistas.org)



----- Forwarded message -----

From: **Aimee Williams** <[aimeecwilliamsesq@gmail.com](mailto:aimeecwilliamsesq@gmail.com)>

Date: Mon, Dec 28, 2015 at 1:03 PM

Subject: Yucca-Argyle Apartment Displacement and Development.

To: [william.lamborn@lacity.org](mailto:william.lamborn@lacity.org)

Dear Mr. Lambord,

My name is Aimee Williams, I am a tenant's rights attorney, a tenant in the Hollywood neighborhood and a neighbor of the Yucca-Argyle Apartments. Through my work, I also have a front-row seat to the housing crisis afflicting Los Angeles.

I stand with the residents of the Yucca-Argyle Apartments and demand no displacement, no development. Los Angeles is in the midst of a historic housing crisis with 13,000 people in the County becoming homeless every month. The Mayor and Council have recognized that we are in the midst of a homelessness epidemic, as well a shortage of affordable housing. Perpetuating the loss of rent-stabilized apartments is contributing to this problem and destroying communities. It is the most vulnerable members of our communities that tend to suffer when market forces create a shortage for a basic human need, like housing.

In 2014 the city lost 1,214 rent-stabilized apartments due to the Ellis Act. We lost over five-hundred rent-stabilized apartments due to the Ellis Act in the first five months of 2015. We must stop proliferating the housing crisis and stop destroying rent-stabilized apartments.

The developer of the Yucca-Argyle project has proposed to include only twenty "affordable" units in the development. These units will be available through a lottery system open to anyone who qualifies. We know that the displaced tenants will have no guarantee of securing one of the twenty "affordable" units. We also know that the definition of affordability used by the city will exclude the majority of the 45 households at risk of displacement.

We demand the City of Los Angeles reject the new development on existing housing. The new development not only displaces 45 existing households, but it will also increase automobile traffic on an already accident-prone intersection of Argyle and Yucca, it will increase noise for existing residents during and post construction, and it will induce the issues of building a large housing complex onto an existing live earthquake fault. With a nearby elementary school and renowned school of dance for youth, traffic is a major point of danger for children walking to and from school and classes on a daily basis. In the event that the development does pass, the existing tenants of the perfectly well maintained Yucca-Argyle Apartment building demand guaranteed right of return for all tenants at the exact same terms of their current tenancy and with no obstacles - no applications, no background checks, no open lottery, and no credit checks.

In November 2015, L.A. City Councilmember Huizar backed the demands of residents of the 1st and Soto apartments in Boyle Heights who were also facing eviction to make way for a development. Negotiating with the developer and with backing from the Councilman, **the residents won guaranteed right of return for all current tenants at the existing terms of tenancy and with no obstacles.**

**We demand at least the same for the 45 households in the Yucca-Argyle Apartments.**

The tenants of Yucca-Argyle are part of the environment of Hollywood. Displacement will have a disastrous impact on peoples' lives and destroy the community. Stop destroying rent-stabilized housing in Los Angeles. Stop proliferating the housing crisis.

Thank you for your attention.

----- Forwarded message -----

From: **Luis Saldivar** <[mypadinla@gmail.com](mailto:mypadinla@gmail.com)>

Date: Mon, Dec 28, 2015 at 2:15 PM

Subject: RE: 6220 West Yucca Project/CASE NO.: ENV- 2014-4706-EIR

To: [william.lamborn@lacity.org](mailto:william.lamborn@lacity.org)

William Lamborn

Major Projects and Environmental Analysis Section Department of City Planning

200 N. Spring Street, Room 750 Los Angeles, CA 90012

Hi William,

My name is Luis Saldivar and I am a tenant of the Yucca-Argyle Apartments. I live at 6220 Yucca Street, Los Angeles, California 90028.

We spoke earlier in the month regarding the scoping meeting and the reason for this email is to let you and the director of city planning Michael J. LoGrande know that I stand with the residents of the Yucca-Argyle apartments and North Vista Del Mar apartments and demand no displacement, no development.

I have many concerns with this project which I will list below.

- The project will displace the families that are in the exiting units, it will change the character of our neighborhood. The families that are being forced out will not be able to move back in. That change needs to be analyzed in the EIR.
- There are 43 existing rental units on site, and the project will only have 39 replacement units. This project is reducing the supply of affordable housing in Hollywood. That is an impact that must be disclosed and addressed.
- How do we know there isn't an earthquake fault under the proposed buildings? Has there been actual trenching completed on the site? The results should be included in the Draft EIR.
- The 101 Freeway traffic is already a mess. The impacts to the ramps and the freeway traffic should be fully analyzed, and the EIR should identify a specific solution to remedy freeway impacts.
- With all the increase in traffic, how will fire trucks be able to access the hills and residential uses? The EIR should analyze the impacts to public service response time.
- The Greenhouse Gas analysis should comply with the new Supreme Court decision in the Newhall case.
- The state of California is sinking due do the current drought crisis we have been experiencing for the past few years forcing our Governor Jerry Brown to declare a drought state of emergency in January 2015. This needs to be analyzed in the EIR.

The developer of the Yucca-Argyle project has proposed to include only twenty “affordable” units in the development. These units will be available through a lottery system open to anyone who qualifies. We know that the displaced tenants will have no guarantee of securing one of the twenty “affordable” units. We also know that the definition of affordability used by the city will exclude the majority of the 45 households at risk of displacement.

We demand the City of Los Angeles reject the new development on existing housing. The new development not only displaces 45 existing households, but it will also increase automobile traffic on an already accident-prone intersection of Argyle and Yucca, it will increase noise for existing residents during and post construction, and it will induce the issues of building a large housing complex onto an existing live earthquake fault.

With a nearby elementary school and renowned school of dance for youth, traffic is a major point of danger for children walking to and from school and classes on a daily basis.

In the event that the development does pass, the existing tenants of the perfectly well maintained Yucca-Argyle Apartment building demand guaranteed right of return for all tenants at the exact same terms of their current tenancy and with no obstacles - no applications, no background checks, no open lottery, and no credit checks.

In November 2015, L.A. City Councilmember Huizar backed the demands of residents of the 1st and Soto apartments in Boyle Heights who were also facing eviction to make way for a development. Negotiating with the developer and with backing from the Councilman, the residents won guaranteed right of return for all current tenants at the existing terms of tenancy and with no obstacles. We demand at least the same for the 45 households in the Yucca-Argyle and North Vista Del Mar Apartments.

The tenants of Yucca-Argyle and North Vista Del Mar are part of the environment of Hollywood. Displacement will have a disastrous impact on peoples’ lives and destroy the community. Stop destroying rent-stabilized housing in Los Angeles. Stop proliferating the housing crisis.

These are some of the points that need to be addressed in the EIR.

Hope this email finds you well and Happy Holidays.

Many Thanks,

Luis Saldivar  
[mypadinla@gmail.com](mailto:mypadinla@gmail.com)

----- Forwarded message -----

From: **Mariana Vargas** <[queonda007@gmail.com](mailto:queonda007@gmail.com)>

Date: Mon, Dec 28, 2015 at 3:24 PM

Subject: RE: 6220 West Yucca Project/CASE NO.: ENV- 2014-4706-EIR

To: [william.lamborn@lacity.org](mailto:william.lamborn@lacity.org)

Greetings,

My name is Mariana Vargas and I am a tenant of the Yucca-Argyle Apartments. I live at 6220 Yucca Street, Los Angeles CA 90028.

As a social worker for the Los Angeles County, I assess risk and safety to keep children safe. As a professional with DCFS, I believe that it is important to assess the impact on housing burden and affordability of any new development or city planning, specially when we have several families and seniors currently living in the Yucca-Argyle Apartments. Most of those who will be displaced will end up homeless in the city of Los Angeles and some will have to leave the city and state.

I stand with the residents of the Yucca-Argyle Apartments and demand no displacement, no development. Los Angeles is in the midst of a historic housing crisis with 13,000 people in the County going homeless every month. In 2014 the city lost 1,214 rent-stabilized apartments due to the Ellis Act. We lost over five-hundred rent-stabilized apartments due to the Ellis Act in the first five months of 2015. We must stop proliferating the housing crisis and stop destroying rent-stabilized apartments.

The developer of the Yucca-Argyle project has proposed to include only twenty "affordable" units in the development. These units will be available through a lottery system open to anyone who qualifies. We know that the displaced tenants will have no guarantee of securing one of the twenty "affordable" units. We also know that the definition of affordability used by the city will exclude the majority of the 45 households at risk of displacement.

We demand the City of Los Angeles reject the new development on existing housing. The new development not only displaces 45 existing households, but it will also increase automobile traffic on an already accident-prone intersection of Argyle and Yucca, it will increase noise for existing residents during and post construction, and it will induce the issues of building a large housing complex onto an existing live earthquake fault.

With a nearby elementary school and renowned school of dance for youth, traffic is a major point of danger for children walking to and from school and classes on a daily basis.

In the event that the development does pass, the existing tenants of the perfectly well maintained Yucca-Argyle Apartment building demand guaranteed right of return for all tenants at the exact same terms of their current tenancy and with no obstacles - no applications, no background checks, no open lottery, and no credit checks.

In November 2015, L.A. City Councilmember Huizar backed the demands of residents of the 1st and Soto apartments in Boyle Heights who were also facing eviction to make way for a development. Negotiating with the developer and with backing from the Councilman, the residents won guaranteed right of return for all current tenants at the existing terms of tenancy and with no obstacles. We demand at least the same for the 45 households in the Yucca-Argyle Apartments.

The tenants of Yucca-Argyle are part of the environment of Hollywood. Displacement will have a disastrous impact on peoples' lives and destroy the community. Stop destroying rent-stabilized housing in Los Angeles. Stop proliferating the housing crisis.

My concerns are the following:

- I am concerned about the public parking availability in the proposed location for said development. The current infrastructure does not allow for the influx of people you are trying to bring to this area.

- I am concerned about the height of the buildings, and the impact of 6 levels of parking above grade. The EIR needs to analyze how the building is going to change the look and feel of my neighborhood and cast shadows over existing and already planned uses. The shade and shadow analysis should cover the area all around the site.

- Why is this site a good location for additional height? The existing height limits were put in place for a reason, and the planned heights will block views. The EIR needs to include analysis of the loss of broader viewsheds to the hills and the Hollywood sign from existing public streets adjacent to the site, and in the Hollywood vicinity.

- What kinds of events are planned for the live entertainment and dancing? This site borders on residential uses. The EIR should analyze potential noise and nuisance impacts from nightlife.

Thank you,  
Mariana Vargas

----- Forwarded message -----

From: **Christina Griffin** <[christina.g.griffin@gmail.com](mailto:christina.g.griffin@gmail.com)>

Date: Mon, Dec 28, 2015 at 3:46 PM

Subject: William:

To: [william.lamborn@lacity.org](mailto:william.lamborn@lacity.org)

My name is Christina Griffin and I live in Los Angeles. I am writing to express my opposition to the Yucca-Argyle development and the displacement of the 45 households living in genuinely affordable rent-stabilized housing.

I stand with the residents of the Yucca-Argyle Apartments and demand no displacement, no development. Los Angeles is in the midst of a historic housing crisis with 13,000 people in the County going homeless every month. In 2014 the city lost 1,214 rent-stabilized apartments due to the Ellis Act. We lost over five-hundred rent-stabilized apartments due to the Ellis Act in the first five months of 2015. We must stop proliferating the housing crisis and stop destroying rent-stabilized apartments.

The developer of the Yucca-Argyle project has proposed to include only twenty "affordable" units in the development. These units will be available through a lottery system open to anyone who qualifies. We know that the displaced tenants will have no guarantee of securing one of the twenty "affordable" units. We also know that the definition of affordability used by the city will exclude the majority of the 45 households at risk of displacement.

We demand the City of Los Angeles reject the new development on existing housing. The new development not only displaces 45 existing households, but it will also increase automobile traffic on an already accident-prone intersection of Argyle and Yucca, it will increase noise for existing residents during and post construction, and it will induce the issues of building a large housing complex onto an existing live earthquake faultily. With a nearby elementary school and renowned school of dance for youth, traffic is a major point of danger for children walking to and from school and classes on a daily basis. In the event that the development does pass, the existing tenants of the perfectly well maintained Yucca-Argyle Apartment building demand guaranteed right of return for all tenants at the exact same terms of their current tenancy and with no obstacles - no applications, no background checks, no open lottery, and no credit checks.

In November 2015, L.A. City Councilmember Huizar backed the demands of residents of the 1st and Soto apartments in Boyle Heights who were also facing eviction to make way for a development. Negotiating with the developer and with backing from the Councilman, the residents won guaranteed right of return for all current tenants at the existing terms of tenancy and with no obstacles. We demand at least the same for the 45 households in the Yucca-Argyle Apartments.

The tenants of Yucca-Argyle are part of the environment of Hollywood. Displacement will have a disastrous impact on peoples' lives and destroy the community. Stop destroying rent-stabilized housing in Los Angeles. Stop proliferating the housing crisis.

Do the right thing and protect affordable housing for my neighbors.

--

Christina Griffin

[christina.g.griffin@gmail.com](mailto:christina.g.griffin@gmail.com)

----- Forwarded message -----

From: **Danai Theodora Zaire** <[dz262@cornell.edu](mailto:dz262@cornell.edu)>

Date: Mon, Dec 28, 2015 at 3:39 PM

Subject: ENV-2014-4706-EIR, EIR Comments, Resident of existing building 1760 Argyle Ave

To: [william.lamborn@lacity.org](mailto:william.lamborn@lacity.org)

Dear William Lambord,  
Major Projects and Environmental Analysis Section,  
Department of City Planning, City of Los Angeles

As a resident of the apartment complex 1760 Argyle Ave, I want to provide my comments in regards to the EIR. Case: ENV-2014-4706-EIR.

At the categories that you include at the paragraph: "Environmental Factors Potentially Affected", you don't mention anything about shading. The EIR should study the existing and future projects (Millennium Project, Kimpton Hotel etc) around the Yucca-Argyle streets and the shade/shadow impacts that their heights, combined with the new 32 stories project will have on the existing buildings.

Also, I am overly concerned about the noise and the air quality in the neighborhood for the next years. The construction of the Kimpton Hotel across the street is going to continue for two years and after that the construction of the 6220 West Yucca Project will begin (and potentially the Millennium Project too). The every-day life in this neighborhood is already unbearable because of : noise pollution –not only during construction hours but also late at night caused by active equipment-, closed sidewalks and crosswalks, construction trucks CO2 emissions and dust. It seems that this is the future of the neighborhood for the next 5+ years.

Additionally, I am looking forward to a very thorough investigation on the stability of the new project based on the proximity to the Hollywood's fault line. The architects of the project avoided offering any information in regards to the standards and construction details for the building against earthquakes.

I am also worried about the Hollywood Hotel Boom, as already there are 12 new Hotels proposed in a very close distance. The character of the neighborhood is changing dramatically. Not to mention that, the new projects, included the 6220 West Yucca Project, -and even if some of them include affordable housing- do not offer any protection to maintaining diversity and protecting the old population. As a result the neighborhood is getting gentrified, and the lower and medium income residents are going to be displaced.

To conclude, I am also overly concerned for the traffic impact of the project, especially in combination with the forthcoming surrounding projects mentioned above, and the future impact that this project will have to the public utilities and existing infrastructure (including water and electricity). I am really worried that this neighborhood is not ready to accept the population influx that this project will result, as it currently lacks in basic infrastructure (well-maintained sidewalks, green space, community facilities) and there are not plans from the city for future improvement.

Best Regards,

Danai Zaire

City Planner

----- Forwarded message -----

From: **elizabeth riley** <[eriley302@gmail.com](mailto:eriley302@gmail.com)>

Date: Mon, Dec 28, 2015 at 3:59 PM

Subject: Comment 1

To: [william.lamborn@lacity.org](mailto:william.lamborn@lacity.org)

**Comment 1# Parking:** We all think that this Champion development project is another asphalt jungle with no green space. Using six levels of above ground cement parking consisting of over half the building, housing 450 parking spots. The parking should be located underground despite the possible higher cost to the developer. We lose six stories of blue skies and open air just because they want to save money and do not want to spend the time. It would be better for air quality and noise if they located the parking below ground and not put an unsightly parking garage right in our backyard where children play and we enjoy the neighborhood.



----- Forwarded message -----

From: **lalozendejasmora** <[lalozendejasmora@gmail.com](mailto:lalozendejasmora@gmail.com)>

Date: Mon, Dec 28, 2015 at 4:00 PM

Subject: Re: 6220 w. yucca project. Case #env2014\_4706eir

To: [william.lamborn@lacity.org](mailto:william.lamborn@lacity.org)

My name is Eduardo Zendejas and I am a tenant at 6220 Yucca street.

I stand with the residents of the Yucca-Argyle Apartments and demand no displacement, no development. Los Angeles is in the midst of a historic housing crisis with 13,000 people in the County going homeless every month. In 2014 the city lost 1,214 rent-stabilized apartments due to the Ellis Act. We lost over five-hundred rent-stabilized apartments due to the Ellis Act in the first five months of 2015. We must stop proliferating the housing crisis and stop destroying rent-stabilized apartments.

The developer of the Yucca-Argyle project has proposed to include only twenty “affordable” units in the development. These units will be available through a lottery system open to anyone who qualifies. We know that the displaced tenants will have no guarantee of securing one of the twenty “affordable” units. We also know that the definition of affordability used by the city will exclude the majority of the 45 households at risk of displacement.

We demand the City of Los Angeles reject the new development on existing housing. The new development not only displaces 45 existing households, but it will also increase automobile traffic on an already accident-prone intersection of Argyle and Yucca, it will increase noise for existing residents during and post construction, and it will induce the issues of building a large housing complex onto an existing live earthquake fault.

With a nearby elementary school and renowned school of dance for youth, traffic is a major point of danger for children walking to and from school and classes on a daily basis.

In the event that the development does pass, the existing tenants of the perfectly well maintained Yucca-Argyle Apartment building demand guaranteed right of return for all tenants at the exact same terms of their current tenancy and with no obstacles - no applications, no background checks, no open lottery, and no credit checks.

In November 2015, L.A. City Councilmember Huizar backed the demands of residents of the 1st and Soto apartments in Boyle Heights who were also facing eviction to make way for a development. Negotiating with the developer and with backing from the Councilman, the residents won guaranteed right of return for all current tenants at the existing terms of tenancy and with no obstacles. We demand at least the same for the 45 households in the Yucca-Argyle Apartments.

The tenants of Yucca-Argyle are part of the environment of Hollywood. Displacement will have a disastrous impact on peoples’ lives and destroy the community. Stop destroying rent-stabilized housing in Los Angeles. Stop proliferating the housing crisis.

This project will block and encumber the Hollywood sign a world Heritage. It will create a major nightmare for traffic. And I believe we do not have the infrastructure for the development proposed.

The city of Los Angeles is not San Francisco nor New York and not even Mexico city we lack mass transit system.

Thank you,

Eduardo Zendejas

----- Forwarded message -----

From: **Heather Fox** <[hfoxen@gmail.com](mailto:hfoxen@gmail.com)>

Date: Mon, Dec 28, 2015 at 5:18 PM

Subject: ENV-2014-4706-EIR Department of City Planning, City of Los Angeles

To: [william.lamborn@lacity.org](mailto:william.lamborn@lacity.org)

Hello,

My name is Heather Fox and I am a friend of the Yucca-Argyle Apartments.

I stand with the residents of the Yucca-Argyle Apartments and demand no displacement, no development. Los Angeles is in the midst of a historic housing crisis with 13,000 people in the County going homeless every month. In 2014 the city lost 1,214 rent-stabilized apartments due to the Ellis Act. We lost over five-hundred rent-stabilized apartments due to the Ellis Act in the first five months of 2015. We must stop proliferating the housing crisis and stop destroying rent-stabilized apartments.

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The tenants of Yucca-Argyle are part of the environment of Hollywood. Displacement will have a disastrous impact on peoples’ lives and destroy the community. Stop destroying rent-stabilized housing in Los Angeles. Stop proliferating the housing crisis.

Thank you for your time,

Heather Fox

# ENV -2014-4706 -EAF SCOPING COMMENT

RECEIVED  
CITY OF LOS ANGELES

DEC 23 2015

ENVIRONMENTAL  
UNIT

- ① ON-SITE  
ALCOHOLIC BEVERAGE CUR SHOULD BE DENIED, THERE ARE AN EXCESSIVE NUMBER OF LICENSES IN THE CONSUM TRACT LARGER THAN ALLOWED BY THE CALIF ABC.
- ② IMPACT OF TRAFFIC ASSOCIATED WITH THIS PROJECT SHOULD BE ANALYZED USING THE CALTRANS HIGHWAY CAPACITY MANUAL (HCM) METHODOLOGY. INCLUDE ANY NECESSARY CHANGES TO INTERSECTIONS AND FREEWAY RAMP UNDER THE SUPERVISION AND APPROVAL OF CALTRANS.
- ③ A FULL ENVIRONMENTAL IMPACT REPORT MUST BE PERFORMED TO FULLY ANALYZE <sup>CUMULATIVE</sup> ENVIRONMENTAL IMPACTS FROM ALL MAJOR PROJECTS IN HOLLYWOOD, AN MND WOULD BE INADEQUATE ENVIRONMENTAL REVIEW
- ④ CALIFORNIA GEOLOGICAL SURVEY - STATE GEOLOGIST MUST BE NOTIFIED TO REVIEW AND COMMENT ON THIS PROJECT
- ⑤ CALTRANS MUST BE NOTIFIED TO REVIEW AND COMMENT ON THIS PROJECT.
- ⑥ SHADING AND SHADOW IMPACTS MUST BE MEASURED AND BUILDING HEIGHT MUST BE LIMITED TO NOT INTERFERE WITH SOLAR DEVICES ON BUILDINGS IN BOUNDING AREA. THE CURRENT AND FUTURE INSTALLATION OF