# APPENDIX A

# NOP AND COMMENTS

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City of
West Hollywood

## NOTICE OF PREPARATION

**To:** Notice of Preparation Recipients (see attached distribution list.)

**Subject: Notice of Preparation of a Draft Environmental Impact Report**

| **Lead Agency** | | **Consulting Firm** | |
|---|---|---|---|
| Agency Name | City of West Hollywood | Firm Name | LSA Associates, Inc. |
| Street Address | 8300 Santa Monica Boulevard | Street Address | 20 Executive Park, Suite 200 |
| City/State/Zip | West Hollywood, CA 90069-6216 | City/State/Zip | Irvine, CA 92614-4731 |
| Contact | David DeGrazia, Senior Planner | Contact | Ashley Davis, Associate |

**Project Title:** Melrose Triangle

**Project Location:** The project site is a triangular parcel located at the west boundary of the City of West Hollywood and is adjacent to the City of Beverly Hills. The project site is bounded by Santa Monica Boulevard to the north, Almont Drive to the east, Melrose Avenue to the south, and Doheny Drive to the west. The project addresses are 9040–9098 Santa Monica Boulevard, 603–629 Almont Drive, and 9001–9021 Melrose Avenue. The site totals 3.05 acres and is currently fully developed with office buildings, industrial uses, a parking structure, and retail uses.

**Project Description:** The City of West Hollywood (City) is considering an application to develop a mixed-use project at the Melrose Triangle (the city block bordered by Melrose Avenue, Santa Monica Boulevard, and Almont Drive). The project would involve demolition of the existing structures on site and the construction of three buildings, with five floors above ground and four parking levels below ground. Components of the project include retail, art gallery/showroom, restaurant, office, residential, and parking uses. This Notice of Preparation (NOP) is being recirculated due to the proposed project being scaled down from its original plans.

The City of West Hollywood will be the Lead Agency and will prepare a Draft Environmental Impact Report (Draft EIR) for the proposed project. This NOP is being circulated in order to obtain input from your agency on the scope and content of the environmental analyses to be contained in the Draft EIR. Specifically, the City of West Hollywood requests input on the environmental information that is germane to your agency's statutory responsibility in connection with the proposed project.

The project description, location, and potential environmental effects, based on the information known to date, are contained in the attached document. Through the receipt of comments on this NOP and the process of preparing the Draft EIR, additions, deletions, and/or modifications of these potential environmental impacts may occur.

Due to the time limits mandated by State law, your response must be received by March 12, 2012. Please send your response to David DeGrazia, Senior Planner, Planning Division, Community Development Department, at the address shown above. We will need the name of a contact person in your agency in case there are questions related to your response to this NOP.

Date 2-1-12

Signature
Title Senior Planner
Telephone (323) 848-6475

# NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE MELROSE TRIANGLE PROJECT

## SUMMARY

The City of West Hollywood (City) is considering an application to develop a mixed-use project at the Melrose Triangle (the triangular block bordered by Melrose Avenue, Santa Monica Boulevard, and Almont Drive). The project would involve demolition of the existing structures on site and the construction of three buildings, with five stories above ground and four parking levels below ground. Components of the project include retail, art gallery/showroom, restaurant, office, residential, and parking uses.

Under the requirements of the California Environmental Quality Act (CEQA) and its Guidelines, the City is the Lead Agency for environmental review and must evaluate the potentially significant environmental effects of the proposed project. The City previously determined that an Environmental Impact Report (EIR) should be prepared to assess the proposed project's effects on the environment, to identify significant impacts, and to identify feasible mitigation measures to reduce or eliminate potentially significant environmental impacts. The Draft EIR was circulated from January 17, 2008, to March 3, 2008. However, based on comments received during the public review period and because the City has subsequently adopted an updated General Plan, the project applicant has revised the project plans. Therefore, the Draft EIR will be updated and recirculated.

While a Notice of Preparation (NOP) was initially circulated in early 2004 and re-circulated in 2007, changes to the project design and an updated City General Plan require updated analysis of potential *Air Quality, Greenhouse Gas, Geology and Soils, Noise, Traffic, Soils, and Hydrology/Water Quality* impacts. This new *Notice of Preparation*:

- Provides updated details on the Melrose Triangle proposal and its construction schedule;
- Informs you of the opportunity to comment on the *scope*, or what is to be included in the contents of the Draft EIR that will be circulated later this year; and
- Is available for review on the City's website at www.weho.org and at the City of West Hollywood, Community Development Department, 8300 Santa Monica Boulevard, West Hollywood, California.

This NOP is being circulated pursuant to California Resources Code Section 21153(a) and CEQA Guidelines Section 15082. Public agencies and the public are invited to comment on the proposed scope and content of the environmental information to be included in the recirculated Draft EIR. A 30-day comment period is provided to return written comments to the City by March 12, 2012. All comments should be directed to the City at the following address:

Mr. David DeGrazia
Senior Planner
Planning Division
Community Development Department
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069-6216
Fax: (323) 848-6575

## ENVIRONMENTAL SETTING

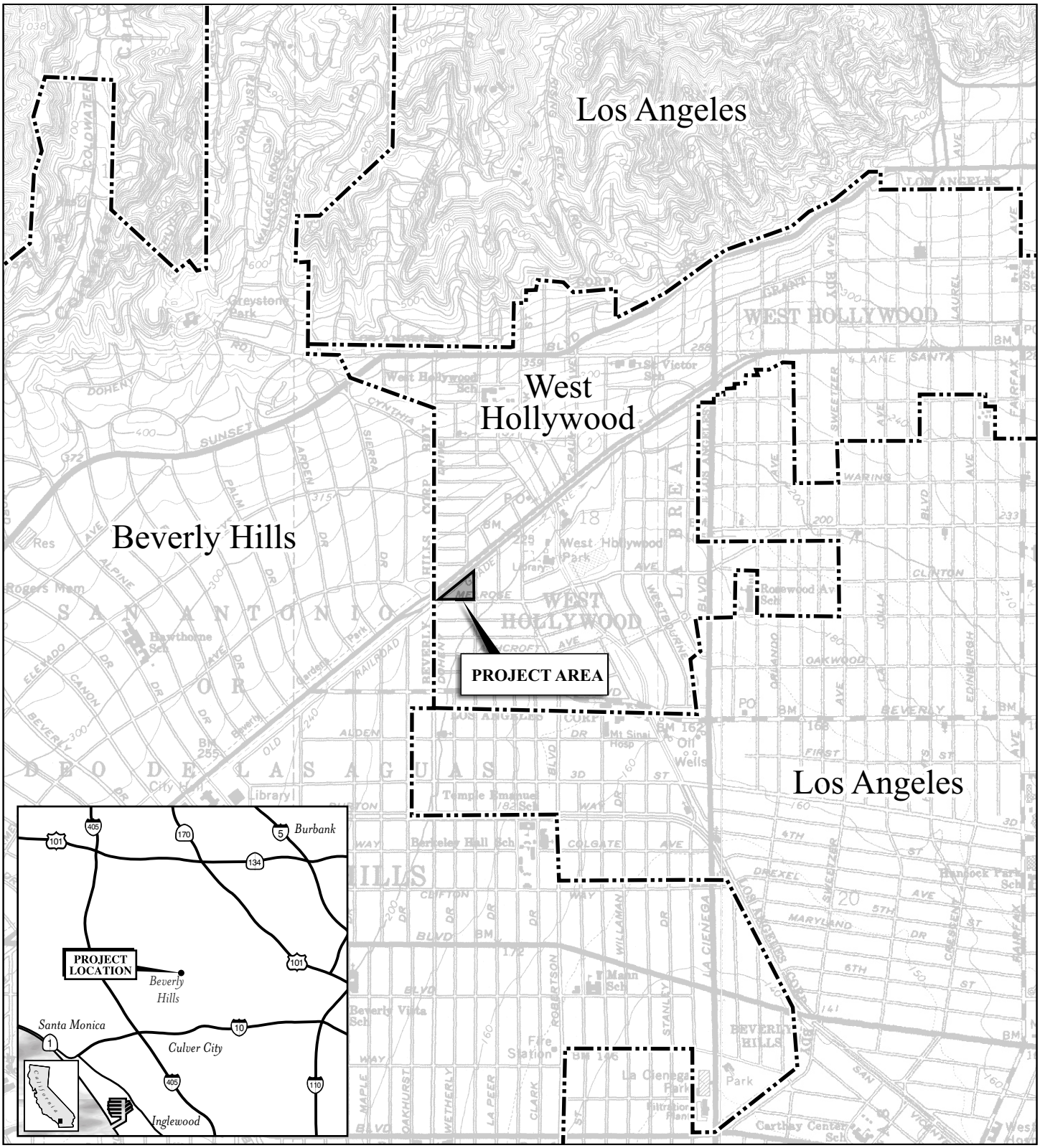
### Project Site and Surrounding Uses

The project site is located on the south side of Santa Monica Boulevard, the north side of Melrose Avenue, and the west side of Almont Drive, adjacent to the City of Beverly Hills (Figure 1, Project Location). The project addresses are 9040–9098 Santa Monica Boulevard, 603–633 Almont Drive, and 9001–9021 Melrose Avenue. The site totals 3.05 acres and is currently developed with office buildings, light industrial uses, a parking structure, and retail uses. The existing commercial uses on Santa Monica Boulevard are generally offices, and on Melrose Avenue are fine art and antique shops and/or studios. Commercial uses on Almont Drive include services, such as appliance repair, with customer parking in the street setback areas. Surrounding land uses consist of one- to three-story commercial buildings along all three streets. South of commercial uses on Melrose Avenue are single- and multi-family dwellings on Rangely Avenue. Beverly Gardens Park and single-family dwellings are located north of Santa Monica Boulevard/Doheny Drive in the City of Beverly Hills.

## PROJECT DESCRIPTION

The Melrose Triangle project includes approximately 82,021 square feet (sf) of retail/restaurant floor area designated for general retail, art galleries, design showroom, and café/restaurant uses. These retail/restaurant uses would be located along Melrose Avenue and Santa Monica Boulevard at the project's street levels. The second through fifth floors are designated for office and residential uses. The project includes a total of 76 residential units, including 12 one-bedroom units, 53 studio/loft units, and 11 two-bedroom units. The project as proposed would provide 923 parking spaces within four parking levels, three of which would be entirely subterranean. The development would be presented in three primary structures; the Boulevard Building, the Gateway Building, and the Avenue Building, which are divided by a broad paseo that would accommodate pedestrian access from Santa Monica Boulevard through to Melrose Avenue (Figure 2, Conceptual Site Plan). Three driveways would provide vehicular access from the adjacent streets. Table A provides a description of the project features.

The building heights of the various components that comprise the proposed development range up to five stories above ground, with four subterranean levels. Because of the elevation change across the project site, the project level that is accessible from the street along the eastern segments of Melrose Avenue and Almont Avenue is below grade on the northern and western parts of the project site. Because the Melrose level is partially subterranean, it is known as Level B1 in the project's architectural plans.




LSA

FIGURE 1

*Melrose Triangle*

Project Location

SOURCE: USGS 7.5' Quads - Beverly Hills & Hollywood, Ca.

I:\CWH430\G\EIR\location.cdr (10/26/06)


LSA

FIGURE 2

N

0 45 90
FEET

SOURCE: studionelevan at Perkowitz+Ruth Architects

*Melrose Triangle*
Site Plan

I:\CWH1002\G\Site Plan.cdr (1/25/12)

**Table A: Project Features**

| Type | Square Footage |
|---|---|
| General Retail | 45,112 square feet |
| Art Galleries | 16,404 square feet |
| Design showrooms | 12,303 square feet |
| Café/restaurant | 8,202 square feet |
| Studio lofts | 53 units |
| One-bedroom apartments | 12 units |
| Two-bedroom apartments | 11 units |
| Parking | 923 spaces |

## PROJECT CHANGES

As stated previously, an NOP was originally circulated in 2004 and recirculated in 2007, and a Draft EIR was circulated in 2008; however, since the time the Draft EIR was circulated, the following changes to the project design have occurred:

- The building heights of the various components that compose the proposed development have been reduced from six stories above ground to five stories above ground.
- The retail/commercial area has been changed to retail/restaurant area providing general retail, art gallery, design showroom, and café/restaurant areas.
- The residential component has been reduced from 195 dwelling units to 76 dwelling units.
- Subterranean levels have been reduced from six levels to four levels, and the subterranean wine and art storage component of the project has been eliminated.
- Vehicular access to the project has been reduced from four driveways to three, providing one driveway each on Santa Monica Boulevard, Melrose Avenue, and Almont Drive.

## TOPICS TO BE ANALYZED IN THE DRAFT EIR

The topics to be analyzed in the Draft EIR are based on the environmental areas that will be potentially impacted by the project. These areas are:

- **Aesthetics.** The Draft EIR will include updated visual simulations that will depict pre- and postproject views of the new buildings. The Draft EIR will describe the proposed change in views of the site and evaluate the impact of the proposed change, as shown in the simulations. An analysis of lighting and glare and shade and shadow will also be prepared.
- **Air Quality.** The air quality technical report will be updated and summarized in the Draft EIR. The Draft EIR analysis will include the following components: assessment of baseline air quality in the area, as documented by nearby air monitoring stations; assessment of traffic and construction impacts; and assessment of operational impacts, consistent with South Coast Air Quality Management District (SCAQMD) guidelines.

- **Biological Resources.** An updated biological tree survey will be conducted and summarized in the Draft EIR. The evaluation in the Draft EIR will include potential project impacts to existing vegetation and associated animal species for areas affected by the proposed project.
- **Cultural Resources.** A supplemental historic resources assessment will be conducted and summarized in the Draft EIR. Evaluation of potential archaeological, historical, and paleontological resources for areas affected by the proposed project will be addressed in the Draft EIR.
- **Geology and Soils.** The geotechnical report will be updated and summarized in the Draft EIR. The geology and soils of the site will be evaluated in the Draft EIR in terms of affecting project implementation. The analysis will include the location of known faults and the potential for earthquake-induced groundshaking capable of causing rupture, liquefaction, settlement, or surface cracks. The potential exposure of people or structures to geologic hazards such asseismic-related ground failure or substantial erosion and to soil conditions such as instability, subsidence, compressibility, expansiveness, or other conditions that might affect project components will also be evaluated. This section of the Draft EIR will summarize the geotechnical report.
- **Global Climate Change/Greenhouse Gas Emissions.** The Draft EIR will include a discussion of greenhouse gases (GHGs) and their potential effects on global climate changes will be included. Regulatory requirements on such emissions, if any, will be identified. Emissions of carbon dioxide ($CO_2$), a key GHG identified in AB 32, and other major GHGs such as methane ($CH_4$) and nitrous oxide ($N_2O$) from direct (such as building heating systems for the community center) and indirect (such as power plant emissions from increased electricity demand) project-related sources will be calculated. The total project GHG emissions will be put into context of area and statewide emissions.
- **Hazards and Hazardous Materials.** An updated hazardous radius report database search will be conducted and summarized in the Draft EIR. The Draft EIR will evaluate the findings of the Phase I Environmental Site Assessment relative to existing and historical activities at the site. This section will also discuss the effects of hazardous materials used during construction and operation of the project.
- **Hydrology and Water Quality.** The Draft EIR will include a discussion of surface water and groundwater, hydrology, and water quality. The section will discuss storm water runoff generated by the project and pollution prevention and will describe how runoff from the site will be collected and distributed to the City storm drain system. Control of groundwater will also be discussed. The water quality analysis will describe the proposed best management practices (BMPs) required to address potential water quality impacts and regulatory requirements. This section will summarize the hydrology/hydrogeology/water quality technical reports.
- **Land Use and Planning.** The project's compatibility with existing surrounding land uses, the recently revised City General Plan policies, and the Zoning Code will be analyzed in the Draft EIR. The Draft EIR will also consider compatibility with surrounding uses in the City of Beverly Hills.
- **Noise.** The noise technical report will be updated and summarized in the Draft EIR. The Draft EIR analysis will include the following components: assessment of baseline noise levels on site, assessment of traffic and construction impacts, and assessment of operational impacts. The Draft EIR will evaluate the potential effect of construction-related vibration on the adjacent properties.

The impact analysis will be limited to changes resulting from the implementation of the proposed project.

- **Population and Housing.** The project's contribution to a population increase within the City and the associated housing effects will be analyzed based on the most current population and housing projections provided by the Southern California Association of Governments (SCAG), the 2010 United States Census, and Regional Housing Needs Assessment (RHNA) projections, and will be summarized in the Draft EIR.
- **Public Services and Utilities.** Public services and utilities data will be updated and summarized in the Draft EIR. The Draft EIR will evaluate the location of infrastructure and public services to serve the project and the capacity of these services and/or infrastructure to serve the project when implemented. Potential impacts to fire safety, police, and emergency services will be addressed. The evaluation will identify service providers' expansion plans and will provide information regarding the purveyor's capacity to provide services and meet demand created by the proposed project.
- **Recreation.** The project's effects on recreation facilities will be updated based on the City's current population and recreation acreage and analyzed in the Draft EIR.
- **Transportation and Traffic.** The traffic impact analysis will be updated and summarized in the Draft EIR. The Draft EIR will analyze short-term and long-term traffic impacts, focusing on the following four primary areas: (1) potential increases in vehicle traffic volumes resulting from the proposed project; (2) pedestrian safety, both on site and within the vicinity of the project site; (3) access driveway interface with the local circulation network; and (4) on-site circulation for vehicles. In addition, potential parking impacts will be addressed.

## TOPICS EXCLUDED FROM ANALYSIS IN THE DRAFT EIR

The following topics were not evaluated in the previously circulated Draft EIR because they were not expected to have a significant effect on the environment. These topics will not be addressed in the recirculated Draft EIR for the same reason.

- **Agricultural Resources.** Based on farmland maps prepared by the California Department of Conservation, the project site is not located in an area designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (California Department of Conservation 2000). The project site is developed with commercial uses, and project implementation would not affect any existing or future agricultural uses. In addition, since the project site is not used for agricultural activities, the project would not convert existing agricultural land to nonagricultural use. Therefore, development of the site would not impact agricultural resources.
- **Mineral Resources.** The project site consists of commercial uses in an urban, built-out portion of Los Angeles County. No known mineral resources that would be of value to the region or the State are located within the project area. Therefore, project implementation would not result in the loss of availability of a known or locally important mineral resource and would not impact mineral resources.

## RESPONSIBLE AGENCIES

According to Sections 15050 and 15367 of the State CEQA Guidelines, the City is designated as the Lead Agency for the project. Responsible Agencies are those agencies that have discretionary approval authority over one or more actions involved with the development of a proposed project. Trustee Agencies are State agencies having discretionary approval or jurisdiction by law over natural resources affected by a proposed project that are held in trust of the people of the State of California. The potential Responsible Agencies that have been identified as of the preparation of this document and the required permits, approvals, or their associated responsibilities for the proposed project are identified in Table B.

**Table B: Potential Responsible Agencies**

| Agency | Potential Permit/Approval/Responsibility/Trust |
|---|---|
| State Water Resources Control Board/Los Angeles Regional Water Quality Control Board | General Construction Activity Stormwater Permit, National Pollutant Discharge Elimination System |
| South Coast Air Quality Management District | Rule 402 and 403 Compliance during construction |

## ENVIRONMENTAL PROCEDURES

This NOP for the proposed project will be submitted to the State Clearinghouse, Responsible Agencies, and other interested parties that will be included in approving or funding the project or that have specifically requested a copy of the NOP.

After the 30-day review period for the NOP is complete, the Draft EIR will be prepared in accordance with CEQA as amended (Public Resources Code, Section 21000 et seq.) and the State Guidelines for Implementation of CEQA (California Code of Regulations, Section 15000 et seq.).

Detailed analyses will be conducted and updated in support of the Draft EIR in order to ascertain the revised project's effects on the environment and the relative degree of impact prior to implementation of mitigation measures. Where impacts are determined to be significant, mitigation measures will be prescribed with the purpose of reducing the project's effects on those impacts either completely or to the maximum degree feasible.

Once the updated Draft EIR is completed, it will be made available for public review and comment. Copies of the Draft EIR will be mailed directly to those agencies commenting on the NOP.

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

**Notice of Preparation**

February 10, 2012

To: Reviewing Agencies

Re: Melrose Triangle
SCH# 2004081014

Attached for your review and comment is the Notice of Preparation (NOP) for the Melrose Triangle 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:

**David DeGrazia**
**City of West Hollywood**
**8300 Santa Monica Boulevard**
**West Hollywood, CA 90029-6216**

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#** 2004081014
**Project Title** Melrose Triangle
**Lead Agency** West Hollywood, City of

**Type** NOP Notice of Preparation

**Description** The Melrose Triangle project includes retail/restaurant floor area designated for general retail, art galleries, design showroom, and cafe/restaurant uses. These retail/restaurant uses would be located along Melrose Avenue and Santa Monica Boulevard at the project's street levels. The second through fifth floors are designated for office and residential uses. All parking would be subterranean. The project would include three primary structures divided by a paseo accommodating pedestrian access from Santa Monica Boulevard through the Melrose Avenue. Three driveways would provide vehicular access from the adjacent streets.

## Lead Agency Contact

**Name** David DeGrazia
**Agency** City of West Hollywood
**Phone** 323 848 6475 **Fax**
**email**
**Address** 8300 Santa Monica Boulevard
**City** West Hollywood **State** CA **Zip** 90029-6216

## Project Location

**County** Los Angeles
**City** Beverly Hills, West Hollywood
**Region**
**Cross Streets** North Doheny Drive, Melrose Avenue, Almont Drive
**Lat / Long** 34° 4' 51.6" N / 118° 23' 16.8" W
**Parcel No.** 4336-025-003 to -012
**Township** 1S **Range** 14W **Section** **Base**

## Proximity to:

**Highways** Hwy 2
**Airports**
**Railways**
**Waterways**
**Schools** Multiple
**Land Use** office buildings, industrial uses, a parking structure, and retail uses/Community Commercial (CC)/Commercial/Mixed Use

**Project Issues**

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

**Date Received** 02/10/2012 **Start of Review** 02/10/2012 **End of Review** 03/12/2012

Note: Blanks in data fields result from insufficient information provided by lead agency.

NOP Distribution List

County: 05 ANG/15

SCH# 2009081019

## Resources Agency

- [■] Resources Agency
  Nadell Gayou
- [ ] Dept. of Boating & Waterways
  Nicole Wong
- [ ] California Coastal Commission
  Elizabeth A. Fuchs
- [ ] Colorado River Board
  Gerald R. Zimmerman
- [x] Dept. of Conservation
  Elizabeth Carpenter
- [ ] California Energy Commission
  Eric Knight
- [ ] Cal Fire
  Allen Robertson
- [ ] Central Valley Flood Protection Board
  James Herota
- [x] Office of Historic Preservation
  Ron Parsons
- [■] Dept of Parks & Recreation
  Environmental Stewardship Section
- [ ] California Department of Resources, Recycling & Recovery
  Sue O'Leary
- [ ] S.F. Bay Conservation & Dev't. Comm.
  Steve McAdam
- [x] Dept. of Water Resources Resources Agency
  Nadell Gayou

## Fish and Game

- [ ] Depart. of Fish & Game
  Scott Flint
  Environmental Services Division
- [ ] Fish & Game Region 1
  Donald Koch
- [ ] Fish & Game Region 1E
  Laurie Harnsberger
- [ ] Fish & Game Region 2
  Jeff Drongesen
- [ ] Fish & Game Region 3
  Charles Armor
- [ ] Fish & Game Region 4
  Julie Vance
- [x] Fish & Game Region 5
  Leslie Newton-Reed
  Habitat Conservation Program
- [ ] Fish & Game Region 6
  Gabrina Gatchel
  Habitat Conservation Program
- [ ] Fish & Game Region 6 I/M
  Brad Henderson
  Inyo/Mono, Habitat Conservation Program
- [ ] Dept. of Fish & Game M
  George Isaac
  Marine Region

## Other Departments

- [ ] Food & Agriculture
  Sandra Schubert
  Dept. of Food and Agriculture
- [ ] Depart. of General Services
  Public School Construction
- [ ] Dept. of General Services
  Anna Garbeff
  Environmental Services Section
- [ ] Dept. of Public Health
  Bridgette Binning
  Dept. of Health/Drinking Water
- [ ] Delta Stewardship Council
  Kevan Samsam

## Independent Commissions,Boards

- [ ] Delta Protection Commission
  Linda Flack
- [ ] Cal EMA (Emergency Management Agency)
  Dennis Castrillo
- [■] Native American Heritage Comm.
  Debbie Treadway
- [x] Public Utilities Commission
  Leo Wong
- [ ] Santa Monica Bay Restoration
  Guangyu Wang
- [ ] State Lands Commission
  Jennifer Deleong
- [ ] Tahoe Regional Planning Agency (TRPA)
  Cherry Jacques

## Business, Trans & Housing

- [ ] Caltrans - Division of Aeronautics
  Philip Crimmins
- [ ] Caltrans - Planning
  Terri Pencovic
- [x] California Highway Patrol
  Suzann Ikeuchi
  Office of Special Projects
- [x] Housing & Community Development
  CEQA Coordinator
  Housing Policy Division

## Dept. of Transportation

- [ ] Caltrans, District 1
  Rex Jackman
- [ ] Caltrans, District 2
  Marcelino Gonzalez
- [ ] Caltrans, District 3
  Bruce de Terra
- [ ] Caltrans, District 4
  Lisa Carboni
- [ ] Caltrans, District 5
  David Murray
- [ ] Caltrans, District 6
  Michael Navarro
- [x] Caltrans, District 7
  Dianna Watson
- [ ] Caltrans, District 8
  Dan Kopulsky
- [ ] Caltrans, District 9
  Gayle Rosander
- [ ] Caltrans, District 10
  Tom Dumas
- [ ] Caltrans, District 11
  Jacob Armstrong
- [ ] Caltrans, District 12
  Marlon Regisford

## Cal EPA

**Air Resources Board**

- [ ] Airport/Energy Projects
  Jim Lerner
- [ ] Transportation Projects
  Douglas Ito
- [ ] Industrial Projects
  Mike Tollstrup
- [ ] State Water Resources Control Board
  Regional Programs Unit
  Division of Financial Assistance
- [ ] State Water Resources Control Board
  Student Intern, 401 Water Quality Certification Unit
  Division of Water Quality
- [ ] State Water Resouces Control Board
  Phil Crader
  Division of Water Rights
- [x] Dept. of Toxic Substances Control
  CEQA Tracking Center
- [ ] Department of Pesticide Regulation
  CEQA Coordinator

## Regional Water Quality Control Board (RWQCB)

- [ ] RWQCB 1
  Cathleen Hudson
  North Coast Region (1)
- [ ] RWQCB 2
  Environmental Document Coordinator
  San Francisco Bay Region (2)
- [ ] RWQCB 3
  Central Coast Region (3)
- [x] RWQCB 4
  Teresa Rodgers
  Los Angeles Region (4)
- [ ] RWQCB 5S
  Central Valley Region (5)
- [ ] RWQCB 5F
  Central Valley Region (5)
  Fresno Branch Office
- [ ] RWQCB 5R
  Central Valley Region (5)
  Redding Branch Office
- [ ] RWQCB 6
  Lahontan Region (6)
- [ ] RWQCB 6V
  Lahontan Region (6)
  Victorville Branch Office
- [ ] RWQCB 7
  Colorado River Basin Region (7)
- [ ] RWQCB 8
  Santa Ana Region (8)
- [ ] RWQCB 9
  San Diego Region (9)

- [ ] Other _____
- [ ] _____ Conservancy

Last Updated 1/27/2012

STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

**NATIVE AMERICAN HERITAGE COMMISSION**
915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
(916) 657-5390 - Fax

February 15, 2012

David DeGrazia
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90029-6216

RE: SCH# 2004081014 Melrose Triangle; Los Angeles County.

Dear Mr. De Grazia:

The Native American Heritage Commission (NAHC) has reviewed the Notice of Preparation (NOP) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archaeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064 (b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archaeological resources, the NAHC recommends the following actions:

- ✓ Contact the appropriate Information Center for a record search to determine:
  - If all or a part of the APE has been previously surveyed for cultural resources.
  - If any known cultural resources have already been recorded on or adjacent to the APE.
  - If the probability is low, moderate or high that cultural resources are located in the APE.
  - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
  - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ Contact the NAHC for a Sacred Lands File Check (SFL).
  - SLF Check Completed, 02/14/2012, indicates potential impact to ""La Brea Tar Pits", a recorded archaeological site known as CA-LAN-159, within the Hollywood Quadrangle.
  - Please contact Anthony Morales as well as the tribes and individuals listed on the attached Native American Contact List to determine if your project will impact this site or others.

The absence of specific site information in the Sacred Lands File does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

- ✓ Contact the NAHC for a list of appropriate Native American Contacts for consultation concerning the project site and to assist in the mitigation measures.
  - Native American Contacts List attached.
    The NAHC makes no recommendation or preference of a single individual, or group over another. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated, if they cannot supply information, they might recommend others with specific knowledge. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call to ensure that the project information has been received. If you receive notification of change of addresses and phone numbers from any of these individuals or groups, please notify me. With your assistance we are able to assure that our lists contain current information.
- ✓ Lack of surface evidence of archaeological resources does not preclude their subsurface existence. Lead agencies should include in their mitigation plan:
  - Provisions for the identification and evaluation of accidentally discovered archaeological resources, per CEQA Guidelines 15064.5 (f).
  - Provisions for monitoring all ground-disturbing activities in areas of identified archaeological sensitivity by an archaeologist meeting the professional qualifications as defined in the *Secretary of Interior's Standards and Guidelines* for archaeology and a culturally affiliated Native American monitor.
  - Provisions for the curation of recovered artifacts, per CEQA Guidelines 15126.4 (5)(b)(3)(C), in consultation with culturally affiliated Native Americans.
  - Provisions for the discovery of Native American human remains. Health and Safety Code 7050.5, CEQA Guidelines 15064.5 (e), and Public Resources Code 5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Katy Sanchez

Katy Sanchez
Program Analyst
(916) 653-4040

cc: State Clearinghouse

**Native American Contact List**
Los Angeles County
February 15, 2012

Ti'At Society/Inter-Tribal Council of Pimu
Cindi M. Alvitre, Chairwoman-Manisar
3098 Mace Avenue, Aapt. D
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**This list is current only as of the date of this document.**

**Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.**

**This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH# 2004081014 Melrose Triangle; Los Angeles County.**

# COUNTY OF LOS ANGELES

**FIRE DEPARTMENT**

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2401

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN


February 28, 2012

David DeGrazia, Senior Planner
Planning Division
Community Development Department
8300 Santa Monica Boulevard
West Hollywood, CA 90069-6216

Dear Mr. DeGrazia:

**NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT, MELROSE TRIANGLE PROJECT, DEMOLITION OF THE EXISTING STRUCTURES ON SITE AND THE CONSTRUCTION OF THREE BUILDINGS, WITH FIVE FLOORS ABOVE GROUND AND FOUR PARKING LEVELS BELOW GROUND, 9040-9098 SANTA MONICA BLVD., 603-629 ALMONT DR., AND 9001-9021 MELROSE AVE., WEST HOLLYWOOD (FFER #201200024)**

The Notice of Preparation has been reviewed by the Planning Division, Land Development Unit, Forestry Division and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

## PLANNING DIVISION:

1. We have no comments at this time.

## LAND DEVELOPMENT UNIT:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Land Development Unit, are the review of and comment on, all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for fire fighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department. We are responsible for the review of all projects within Contract Cities (cities that contract with the County of Los Angeles Fire Department for fire protection services).

We are responsible for all County facilities, located within non-contract cities. The County of Los Angeles Fire Department, Land Development Unit may also comment on conditions that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment.

2. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.

3. When involved with subdivision in a city contracting fire protection with the County of Los Angeles Fire Department, the Fire Department requirements for access, fire flows and hydrants are addressed during the subdivision tentative map stage.

4. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways, with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.

5. Fire sprinkler systems are required in some residential and most commercial occupancies. For those occupancies not requiring fire sprinkler systems, it is strongly suggested that fire sprinkler systems be installed. This will reduce potential fire and life losses. Systems are now technically and economically feasible for residential use.

6. The development may require fire flows up to 8,000 gpm at 20 pounds per square inch residual pressure for up to a four-hour duration as outlined in the 2008 County of Los Angeles Fire Code Appendix B, Table B105. Final fire flows will be based on the size of buildings, its relationship to other structures, property lines and types of construction used.

7. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:

   a) No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.

   b) No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.

   c) Additional hydrants will be required if hydrant spacing exceeds specified distances.

   d) When cul-de-sac depth exceeds 200 feet on a commercial street, hydrants shall be required at the corner and mid block.

   e) A cul-de-sac shall not be more than 500 feet in length, when serving land zoned for commercial use.

8. Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs.

9. NON-RESIDENTIAL ACCESS - All on-site driveways/roadways shall provide a minimum unobstructed width of 28 feet, clear-to-sky. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building. The centerline of the access

driveway shall be located parallel to and within 30 feet of an exterior wall on one side of the proposed structure.

10. NON-RESIDENTIAL ACCESS WIDTHS - Driveway width for non-residential developments shall be increased when any of the following conditions will exist:

    a) Provide 34 feet in-width, when parallel parking is allowed on one side of the access roadway/driveway. Preference is that such parking is not adjacent to the structure.

    b) Provide 42 feet in-width, when parallel parking is allowed on each side of the access roadway/driveway.

    c) Any access way less than 34 feet in-width shall be labeled "FIRE LANE" on the final recording map and final building plans.

    d) For streets or driveways with parking restrictions: The entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with Fire Department approved signs stating "NO PARKING - FIRE LANE" in three-inch high letters. Driveway labeling is necessary to ensure access for Fire Department use.

11. All access devices and gates shall meet the following requirements:

    a) Any single gated opening used for ingress and egress shall be a minimum of 26 feet in-width, clear-to-sky.

    b) Any divided gate opening (when each gate is used for a single direction of travel i.e., ingress or egress) shall be a minimum width of 20 feet clear-to-sky.

    c) Gates and/or control devices shall be positioned a minimum of 50 feet from a public right-of-way and shall be provided with a turnaround having a minimum of 32 feet of turning radius. If an intercom system is used, the 50 feet shall be measured from the right-of-way to the intercom control device.

    d) All limited access devices shall be of a type approved by the Fire Department.

    e) Gate plans shall be submitted to the Fire Department, prior to installation. These plans shall show all locations, widths and details of the proposed gates.

12. All proposals for traffic calming measures (speed humps/bumps/cushions, traffic circles, roundabouts, etc.) shall be submitted to the Fire Department for review, prior to implementation.

13. Provide three sets of alternate route (detour) plans, with a tentative schedule of planned closures, prior to the beginning of construction. Complete architectural/structural plans are not necessary.

14. Notify the County of Los Angeles Fire Department, Fire Station 7 at (310)358-3430, and Fire Station 8 at (323) 654-5445, at least three days in advance of any street closures that may affect Fire/Paramedic responses in the area.

15. Temporary bridges shall be designed, constructed and maintained to support a live load of at least 70,000 pounds. A minimum vertical clearance of 13 feet 6 inches will be required throughout construction.

16. Disruptions to water service shall be coordinated with the County of Los Angeles Fire Department and alternate water sources shall be provided for fire protection during such disruptions.

17. The County of Los Angeles Fire Department, Land Development Unit comments are only general requirements. Specific fire and life safety requirements and conditions set during the environmental review process will be addressed and conditions set at the building and fire plan check phase. Once the official plans are submitted for review there may be additional requirements.

18. The County of Los Angeles Fire Department, Land Development Unit appreciates the opportunity to comment on this project.

19. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department, Land Development Unit Inspector, Nancy Rodeheffer, at (323) 890-4243 or at nrodeheffer@fire.lacounty.gov.

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed in the Draft Environmental Impact Report.

**HEALTH HAZARDOUS MATERIALS DIVISION:**

1. The Health Hazardous Materials Division has no objection to the proposed project. However, the review of submitted documents indicate potential historical use of hazardous materials on site. If the project site involved use of hazardous materials, it is recommended that the subject property be assessed and if necessary mitigated under oversight of a governmental agency.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

JOHN R. TODD, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

JRT:ij

LOS ANGELES CONSERVANCY

March 12, 2012

**Submitted electronically**

Mr. David DeGrazia
Senior Planner
West Hollywood City Hall
8300 Santa Monica Boulevard
West Hollywood, CA 90069
Email: ddegrazia@weho.org

**Re: Notice of Preparation -- Melrose Triangle Project**

Dear Mr. DeGrazia:

On behalf of the Los Angeles Conservancy, we submit these comments on the proposed Melrose Triangle Project and the need to consider alternatives that retain the Streamline Moderne commercial building at 9080 Santa Monica Boulevard as part of the ongoing environmental review process. The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with over 6,700 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

## A. Architectural significance of 9080 Santa Monica Boulevard

The structure at 9080 Santa Monica Boulevard is a notable and rare surviving example of a Streamline Moderne commercial building in the City of West Hollywood. Originally constructed in 1928, the building exhibits several character defining features associated with the Streamline Moderne style, including smooth wall surfaces, curved corners and volumes, an emphasized horizontal design, window fenestration defined by continuous ribbons across the façade, extensive use of glass block, and polished stainless steel for the entrance canopy and vertical fins rising above the main door.

Taking its name from the curved form of a teardrop, which was the most efficient shape in lowering the wind resistance of an object placed in the stream lines of a wind tunnel, the Streamline Moderne evoked a sense of modern efficiency with sleek finishes, curved surfaces, and a spare use of detailing which often included pronounced horizontal banding and, to a lesser extent, vertical banding accents.[1] As an architectural style, Streamline Moderne was applied to numerous building types and uses, ranging from both single family and multi-family residential dwellings in particular regions such as greater Los Angeles, to a wide variety of commercial

[1] Gleye, Paul. The Architecture of Los Angeles. Los Angeles: Rosebud Books, 1981: 130.

buildings including medical offices, department stores, grocery stores, movie theaters, gas stations, bus stations and restaurants throughout the nation.

The January 2008 draft EIR prepared for an earlier version of the Melrose Triangle Project found that "the building appears to be eligible under Criterion 3 as a fine example of Streamline Moderne architecture" and noted that it "is in good condition and retains its integrity."[2] Within West Hollywood's borders, there are exceedingly few examples of the Streamline Moderne style, making 9080 Santa Monica Boulevard a particularly rare resource type for the city.

West Hollywood has long been praised for the community's commitment and dedication to historic preservation and was recognized for those efforts by the National Trust for Historic Preservation in 2007 as one of America's "Dozen Distinctive Destinations." The City's General Plan has a strong Historic Preservation element, establishing several goals for preserving the city's unique architectural heritage, specifically stating the following:

> "With the tourism, interior design, and film industries playing important roles in the economy, West Hollywood's cultural resources create an inviting and attractive built environment for the business community. Familiar landmarks also establish a sense of permanence and well-being for residents."[3]

### B. The Draft EIR should evaluate a range of reasonable alternatives that retain and reuse the historic building at 9080 Santa Monica Boulevard

A key policy under the California Environmental Quality Act (CEQA) is the lead agency's duty to "take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history."[4] CEQA "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects."[5] Courts often refer to the EIR as "the heart" of CEQA because it provides decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzes a range of alternatives that reduce those impacts."[6]

As currently proposed, the project would raze all existing buildings within the project area, including the historic building at 9080 Santa Monica Boulevard, for a mixed use project consisting of three primary structures, subterranean parking, and a pedestrian paseo. The project site plan included in the NOP depicts the proposed "Gateway building" occupying much of the footprint of 9080 Santa Monica Boulevard.[7]

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[2] Melrose Triangle draft EIR, Jan. 2008: 4.4-5.
[3] West Hollywood General Plan, Historic Preservation Element, 4-3.
[4] Public Resource Code, Sec. 21001 (b), (c).
[5] *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41, italics added; also see PRC Secs. 21002, 21002.1.
[6] *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1123.
[7] Melrose Triangle NOP, Feb. 2012: 4.

It is undisputed that the proposed project, including demolition of an identified historical resource, would cause significant and irreversible adverse impacts to cultural resources. Accordingly, the Draft EIR must evaluate at least one potentially feasible alternative that incorporates the historic building at 9080 Santa Monica Boulevard into the project and retains its eligibility as a historical resource. The Draft EIR should consider a range of options that reuse the historic building for uses consistent with the project description, combined with infill construction elsewhere on the site to provide the desired aggregate of square footage. Potential alternatives in the Draft EIR could explore a redesign of the proposed "Gateway building," such as a distinctive flatiron design that responds to the site's triangular western portion and orientation facing eastbound traffic along Santa Monica Boulevard.

The NOP states that proposed uses for the project will include general retail, art galleries, design showroom, and café/restaurant uses to be located along Melrose Avenue and Santa Monica Boulevard at the project's street level.[8] Art gallery and showroom uses could be particularly well-suited for 9080 Santa Monica Boulevard; the building's extensive bands of glass block provide abundant natural and diffused lighting conducive to these uses.

Compared to the previous project proposed for the site, the current proposed project is significantly reduced in scale: 76 residential units from a previous total of 195; a maximum of 5 floors for building heights, reduced from 6 floors; and 4 subterranean levels, reduced from 6. This reduction in scale from the previous version of the project provides further flexibility for retaining and reusing 9080 Santa Monica Boulevard while still attaining most of the project objectives, necessary square footage, and parking.

Despite the reduced scale of the current project, the number of proposed parking spaces has increased from 856 to a total of 923. Because the proposed project appears to exceed city parking requirements (170 cited as required for previous project),[9] preservation options should not be considered infeasible simply by failing to provide the total desired number of spaces. Under the various alternatives that can be explored in the Draft EIR, the proposed underground levels could be built around the perimeter of the historic building at 9080 Santa Monica Boulevard, potentially with additional levels of subterranean parking at other portions of the project area.

We urge the City of West Hollywood to uphold its historic preservation goals outlined in the recently-updated General Plan by incorporating the historic building at 9080 Santa Monica Boulevard into the Melrose Triangle Project. It provides an opportunity to create a dynamic and vibrant urban project with a mix of building heights and styles, of both historic and new construction. Typical of older commercial buildings, the building at 9080 Santa Monica Boulevard extends directly to the sidewalk at the lot line -- a quality which promotes lively street life by placing business storefronts directly adjacent to pedestrian traffic. The new infill construction proposed for the Melrose Triangle Project should also provide street frontage adjacent to the Santa Monica Boulevard sidewalk which will complement the existing character of the historic building at 9080 Santa Monica Boulevard.

[8] Melrose Triangle NOP, Feb. 2012: 2.
[9] Melrose Triangle draft EIR, Jan. 2008: 3-6.

The West Hollywood Historic Preservation Commission may be able to provide assistance on this project and should be consulted early for valuable input and recommendations. Further, the Commission may be able to provide suggestions on crafting appropriate alternatives that would reuse the historic building at 9080 Santa Monica Boulevard while retaining its eligibility as an identified historic resource.

Thank you for the opportunity to comment on the Notice of Preparation for the Melrose Triangle Project. The Conservancy looks forward to reviewing and commenting on the forthcoming Draft EIR for this project. Please feel free to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions.

Sincerely,

Adrian Scott Fine
Director of Advocacy

cc: West Hollywood Historic Preservation Commission
Art Deco Society of Los Angeles

March 12, 2012

David DeGrazia, Senior Planner
City of West Hollywood
8300 Santa Monica Blvd
West Hollywood, CA 90029-6219

RE: Notice of Intent to Prepare a Draft Environmental Impact Report - Melrose Triangle Project
9040-9098 Santa Monica Boulevard
603-629 Almont Drive
9001-9021 Melrose Avenue

Dear Mr. DeGrazia:

Included in this letter is a list of issues the City of Beverly Hills would like studied in the draft Environmental Impact Report (EIR) that is to be completed for the Melrose Triangle Project. It is our understanding that the Melrose Triangle Project includes the properties between Santa Monica Boulevard and Melrose Avenue, from Doheny Drive to Almont Drive. This would include the properties addressed: 9040-9098 Santa Monica Boulevard, 603-629 Almont Drive, 9001-9021 Melrose Avenue. The project would involve demolition of all existing structures and the construction of four below ground parking levels and three buildings each with five floors above ground. The project would include retail, restaurant, art gallery/showroom, office, residential, and parking.

Due to the project's close proximity to the City boundary and the projects magnitude, we believe there is a potential that the City of Beverly Hills and its residents could experience negative impacts both during the construction of this project and as a result of operation thereafter. The Notice of Preparation (NOP) states that prior NOPs were circulated for this project in 2004 and again in 2007, and that changes to the project and the adoption of a new general plan require updated analysis for potential Air Quality, Geology and Soils, Noise, Traffic, Soils, and Hydrology/Water Quality impacts. This project has a potential to create negative impacts in all categories

under the California Environmental Quality Act and therefore the City of Beverly Hills requests that, as necessary, all environmental impact analysis be updated and presented in the draft EIR, to include any and all analysis conducted for the following categories of impacts under the California Environmental Quality Act (CEQA):

- Aesthetics
- Air Quality
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Traffic and Circulation
- Utilities and Service Systems

In addition to the above environmental impact analysis, the City of Beverly Hills requests that the following specific issues be studied in the draft EIR:

TRAFFIC

1. Please conduct traffic analyzes for the following intersections located in the City of Beverly Hills but near the project site. This list should be considered as the minimum amount of analysis to conduct to estimate traffic impacts from the project. Based on results in the upcoming draft EIR, the City of Beverly Hills may request additional streets studied. Please conduct the analysis using City of Beverly Hills thresholds and methodology.
   a. The Intersection of Santa Monica and Doheny Dr. (using Beverly Hills criteria)
   b. the intersection of Civic Center-Melrose-Doheny (as a separate intersection)
   c. The intersection of Santa Monica Boulevard and Beverly Boulevard-Palm Dr.
   d. The intersection of Doheny Drive/Elevado Ave (stop controlled)
   e. The intersection of Doheny Drive/Burton Way
   f. The intersection of Doheny Drive/Beverly Boulevard (using Beverly Hills criteria)
   g. The intersection of Doheny Drive/Wilshire Boulevard
   h. The intersection of Carmelita Ave and Doheny Drive (stop controlled)

2. Please analyze the following residential street segments using City of Beverly Hills residential impact thresholds and methodology:
   a. "Civic Center Drive between Oakhurst and Doheny",
   b. "Oakhurst Drive between Beverly Boulevard and Civic Center Drive" and
   c. "Carmelita Ave. between Sierra Drive and Doheny Drive".

3. Please estimate cumulative traffic generated from all projects (approved/pending) within a one mile radius of the project site. The City of Beverly Hills Transportation Division maintains up to date lists of all major projects occurring and pending in the City of Beverly Hills. The Transportation Division can be reached at (310) 285-2556.

4. When studying intersections and street segments in the City of Beverly Hills, including shared intersections and street segments, please use City of Beverly Hills thresholds and methodology for calculating Level of Service. Please contact the City's Transportation Division at (310) 285-2556 for the methodology and thresholds of significant impact criteria.

5. All construction related issues for the proposed project should be studied in detail, and when applicable, mitigation measures should be proposed. This includes, but is not limited to all of the following:

   a. Heavy haul routing,
   b. Frequency,
   c. Truck size,
   d. Hours of operation,
   e. Location of construction ramps and driveways,
   f. Construction parking supply and demand,
   g. Duration of the project and calendar,
   h. Dust control and trucks wheels washing practice,
   i. pavement quality control, and
   j. Any other construction related issues and information that could impact City of Beverly Hills neighborhoods.

6. Please include a focused analysis of the Doheny Drive and North Santa Monica- Melrose Boulevard intersection. Currently traffic delays and congestion are occurring in both jurisdictions at this intersection. The study should explore the possibility of geometric design modifications and/or signal operation adjustments to mitigate the present and any potential future problems.

INFRASTRUCTURE

7. Please consider the following infrastructure issues and upgrading in the project and conduct all necessary environmental analysis regarding:

   a. The existing City of Beverly Hills Cast Iron (CI) waterlines in Almont Drive (10" CI), Melrose Avenue (12" CI) and Santa Monica Boulevard North (6" CI) will need to be replaced with the following: Almont Drive (10" Ductile Iron(DI)), Melrose Avenue (12" DI) and Santa Monica Boulevard North (10" DI)

   b. There is an abandoned 16" steel line in Melrose Avenue.

   c. The City of Beverly Hills owns and operates a Pressure Reducing Valve Station (PRV) at the intersection of Santa Monica Boulevard North and Melrose that will need to be replaced

with new DI piping and Cla-Valves. The new vault must be traffic rated with a hydraulically-operated access hatch.

d. The City of Beverly Hills intends to reconstruct Santa Monica Boulevard North from Doheny Drive to Wilshire Drive beginning in January, 2014 and lasting for at least one year. Please assume that during construction, Santa Monica Boulevard will, at times be unavailable to construction vehicles, and in general will have limited availability during this time period.

e. The City of Beverly Hills is planning to improve the intersection of Santa Monica Boulevard and Doheny Drive. The project should be studied for any potential impacts to the Doheny Drive/ Santa Monica Boulevard intersection gateway in terms of siting, architecture, and any other feature that could result in negative impacts in regards to CEQA. Information on the City of Beverly Hills gateway can be found at: http://www.beverlyhills.org/government/pwtrans/engineering/bid_12_27_gateway_monuments.asp

Thank you for this opportunity to provide input on the environmental review of this project. Please list me as primary contact for the City of Beverly Hills, and please place my name on the project's list of interested parties and to receive copies of all notices issued regarding. Please also provide a copy of any notice of determination that may be filed with respect to the Project, pursuant to the provisions of Public Resources Code Section 21197 (f).

If you have any questions regarding this letter, please feel free to contact me at (310) 285-1127 or by email at pnoonan@beverlyhills.org.

Sincerely,

PETER NOONAN, AICP CEP
Associate Planner, Community Development

cc: Jeff Kolin, City Manager
Susan Healy Keene, AICP, Director of Community Development
Jonathan Lait, AICP, City Planner
David Gustavson, Director of Public Works
Aaron Kunz, AICP, Deputy Director of Public Works - Transportation

*County of Los Angeles*
**Sheriff's Department Headquarters**
*4700 Ramona Boulevard*
*Monterey Park, California 91754-2169*

*Leroy D. Baca, Sheriff*

March 7, 2012

David DeGrazia, Senior Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069

Dear Mr. DeGrazia:

**REVIEW COMMENTS**
**NOTICE OF PREPARATION**
**MELROSE TRIANGLE PROJECT**
**(SCH NO. 2004081014)**

The Los Angeles County Sheriff's Department (Department) submits the following review comments on the Notice of Preparation (NOP), dated February 1, 2012, for the Melrose Triangle Project (Project). The proposed Project is located at 9040-9098 Santa Monica Boulevard, 603-629 Almont Drive, and 9001-9021 Melrose Avenue, in the City of West Hollywood (City). The proposed Project is the demolition of existing structures on site and the construction of a mixed-use development consisting of 76 residential units and 82,021 square feet of retail, showroom, gallery, and restaurant space.

The NOP for the proposed Project was reviewed by the Department's West Hollywood Station (see the attached correspondence, dated February 27, 2012, from Captain Kelley S. Fraser). The Station also provides responses to a questionnaire received from the City's environmental consultant (LSA Associates) regarding Station resources and Project assessment.

In summary, the proposed Project, as described in the NOP, is not expected to have a significant impact on the Department's resources or the Station's operations. The Department has no other comments to submit at this time, but reserves the right to further address this matter in subsequent reviews of the proposed Project.

Thank you for including the Department in the environmental review process for the proposed Project. Should you have any questions of the Department regarding this matter, please contact Lester Miyoshi, of my staff, at (626) 300-3012 and refer to Facilities Planning Bureau Tracking No. 12-010. You may also contact Mr. Miyoshi, via e-mail, at Lhmiyosh@lasd.org.

Sincerely,

LEROY D. BACA, SHERIFF

Gary T.K. Tse, Director
Facilities Planning Bureau

GTKT:LM:lm/mm

Attachment

c: Kelley S. Fraser, Captain, West Hollywood (WHS) Station
James C. Farrell, Sergeant, WHS Station
Lester Miyoshi, Project Manager, Facilities Planning Bureau
Chrono
(EIR-MelroseTriangleProject)

COUNTY OF LOS ANGELES

# SHERIFF'S DEPARTMENT

*A Tradition of Service*

DATE: February 27, 2012

OFFICE CORRESPONDENCE FILE NO.

**FROM:** KELLEY S. FRASER, CAPTAIN
WEST HOLLYWOOD STATION

**TO:** GARY TSE, DIRECTOR
FACILITIES PLANNING BUREAU

**SUBJECT:** ENVIRONMENTAL IMPACT REPORT (E.I.R.), MELROSE TRIANGLE PROJECT

The purpose of this memorandum is to revise our previously tendered memorandum concerning possible environmental impacts (public services, traffic and noise) in relation to a proposed commercial/residential development. The project site is comprised of a triangular block bounded by Santa Monica Boulevard, Melrose Avenue and Almont Drive. Project addresses are 9040-9098 Santa Monica Boulevard, 9001-9021 Melrose Avenue and 603-629 Almont Drive. The shape of the project is formed by the merging of Melrose Avenue into Santa Monica Boulevard at the west terminus of Melrose Avenue. Doheny Drive serves as the boundary between the cities of Beverly Hills and West Hollywood and is located at the west end of the project site. The city of Beverly Hills is located west of Doheny Drive.

Based upon recent discussions with West Hollywood city planning staff, traffic engineers and management personnel, it appears that this project would not place an additional burden upon Sheriff's personnel and resources. After reviewing the City's already completed roadway alignment, engineering and traffic pattern mitigation efforts, I believe the additional traffic volume generated by approximately 90 residents would be nominal. The projected project would be mostly self-contained, have adequate parking for residents, patrons, and visitors and would not adversely affect the traffic pattern in the surrounding streets.

I would also estimate that any projected police resources necessary to respond to additional calls-for-service would be nominal. West Hollywood Sheriff's Station currently has adequate personnel and resources available to manage any additional calls-for-service generated by the projected project residents. We are prepared to monitor calls-for-service and activities generated by the project and if at some future date additional assets or resources are deemed to be necessary, the City has promised to respond by increasing contractual service levels.

The remaining pages of this EIR answers questions posed in the response sheets. The responses to questions 5 and 6 have been modified to reflect our revised assessment of the potential impact of the proposed project.

Amy Lester CC'Cathe

ENVIRONMENTAL IMPACT REPORT

1. *Please indicate the location of the police stations(s) that would serve the Project area.*

   **a.** The City of West Hollywood contracts with the Los Angeles County Sheriff's Department for police services. The West Hollywood Station, located at 780 North San Vicente Boulevard, provides services for the City of West Hollywood, and unincorporated Universal City.

2. *What is the geographical area and total population that is served by the station?*

   **a.** The City of West Hollywood is approximately 1.9 square miles in size and has a diverse demographic population. The total residential population is just over 37,000, however, the nighttime population swells to between 80,000and 100,000 with a high of over 500,000 during major events such as Halloween or the Gay and Lesbian Pride Parade.

3. *How many law enforcement officers and patrol cars presently serve the project area vicinity?*

   **a.** The current station complement consists of 129 sworn personnel, with only 52 assigned to patrol duties.

4. *What is the approximate response time to the Project site? Please breakdown response time into categories (e.g., emergency, non-emergency, etc.) as available.*

   **a.** Response times are currently within established norms for routine, priority and emergency calls.

5. *Do you anticipate any significant impact from the Project on current service around the Project area, such as increasing service calls or the need for additional manpower and patrol vehicles. Please provide generation factors if it is determined that additional manpower or patrol cars are required.*

   **a.** A recent review with regards to the proposed project suggests that an increase of approximately 90 residents would not result in an increased demand for police services due to the project's residential population and would not result in increased traffic congestion.

6. *Do you anticipate that the Project implementation would result in the need for physical additions to your agency (i.e., construction of a new police station)?*

West Hollywood Station currently has adequate personnel and resources available to manage any additional calls for service generated by the projected project residents.

| | | | |
|---|---|---|---|
| Prepared for: | LSA Associates Inc.<br>20 Executive Park, Suite 200<br>Irvine, CA. 92614-4731 | Prepared by:<br>Title:<br>Date:<br>Phone: | James Farrell<br>Sergeant<br>February 27, 2012<br>(310) 855-8850 |
| Re: | Melrose Triangle Project | | |

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

March 7, 2012

David DeGrazia, Senior Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069

**Notice of Preparation of a CEQA Document for the Melrose Triangle Project**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD'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 Draft EIR 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. The lead agency may wish to consider using land use emissions estimating software such as URBEMIS 2007 or the recently released CalEEMod. These models are available on the SCAQMD Website at: http://www.aqmd.gov/ceqa/models.html.

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 developed a methodology for calculating PM2.5 emissions from construction and operational activities and processes. In connection with developing PM2.5 calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM2.5 emissions and compare the results to the recommended PM2.5 significance thresholds. Guidance for calculating PM2.5 emissions and PM2.5 significance thresholds can be found at the following internet address: http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html.

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's 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 significance 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/ceqa/handbook/LST/LST.html.

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 on the SCAQMD's CEQA web pages at the following internet address: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

**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 significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD's CEQA web pages at the following internet address: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. 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/prdas/aqguide/aqguide.html. In addition, guidance on siting incompatible land uses 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. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

**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 World Wide Web Homepage (http://www.aqmd.gov).

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. If you have any questions regarding this letter, please call Ian MacMillan, Program Supervisor, CEQA Section, at (909) 396-3244.

Sincerely,

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

IM
LAC120210-05
Control Number

Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952
213.922.2000 Tel
metro.net

Metro

March 7, 2012

Mr. David DeGrazia
Senior Planner
Planning Division
Community Development Department
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069-6216

Re: Melrose Triangle Project

Dear Mr. DeGrazia:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Melrose Triangle Project. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues that are germane to our agency's statutory responsibilities in relation to the proposed project.

A Traffic 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; and
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.

MTA looks forward to reviewing the Draft EIR. If you have any questions regarding this response, please call me at 213-922-2836 or by email at hartwells@metro.net. Please send the Draft EIR to the following address:

MTA CEQA Review Coordination
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952
Attn: Scott Hartwell

Scott Hartwell
CEQA Review Coordinator, Long Range Planning

Attachment

APPENDIX

D

# 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.

## 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.

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON CHAN
*Chief Engineer and General Manager*

March 8, 2012

File No: 04-00.04-00

Mr. David DeGrazia, Senior Planner
Community Development Department
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069-6216

Dear Mr. DeGrazia:

**Melrose Triangle Project**

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on February 10, 2012. The proposed development is located within the jurisdictional boundaries of District No. 4. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Sherman Relief Trunk Sewer, located in San Vicente Boulevard at Beverly Boulevard. This 21-inch diameter trunk sewer has a design capacity of 6.8 million gallons per day (mgd) and conveyed a peak flow of 5.2 mgd when last measured in 2009.

2. Wastewater generated by the proposed project will be treated by the City of Los Angeles Hyperion Treatment System. Questions regarding sewerage service for the proposed project should also be directed to the City of Los Angeles' Department of Public Works.

3. The expected average wastewater flow from the project site is 11,254 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Information Center, Will Serve Program/Buildover Procedures, Obtain Will Serve Letter, and click on the appropriate link on page 2.

4. The Districts are authorized by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Information Center, Will Serve Program/Buildover Procedures, Obtain Will Serve Letter, and click on the

appropriate link on page 2. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Grace Robinson Chan

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR: ar

c: M. Tremblay
J. Ganz

**STAFFORD COMMERCIAL REAL ESTATE, INC.**
356 North Robertson Blvd., Los Angeles, CA 90048
Telephone: 310.360.9900
www.staffordcommercial.com

February 21, 2012

David De Grazia,
Senior Planner
City of West Hollywood
8300 Santa Monica Blvd.
West Hollywood, CA. 90029-6219

Re: Melrose Triangle Proposal Development

Dear David,

I am the owner of a commercial property on the corner of Melrose and Almont directly across the street from the proposed development site. I am not opposed to the development project as it has been proposed as long as the City will provide the following guidelines for the developer and protects the interests of the adjacent property owners and the neighborhood.

1. First and foremost, the triangle has significant frontage on three major streets in West Hollywood and therefore the project must have pedestrian friendly commercial businesses open to the public on each of the three streets in order to create a healthy synergy between the project and the surrounding neighborhood. It should have properly landscaped pedestrian entrances spaced at appropriate intervals on each of the three streets to encourage the flow of pedestrian traffic from the neighborhood into the project and conversely from the project into the neighborhood.

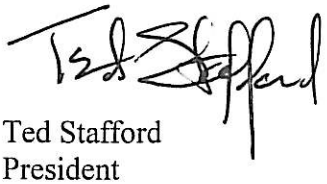
2. Architecturally I think it would be a much more interesting project to see buildings of various heights and maybe even complimentary but different architectural features instead of just one type of construction. If all of the buildings are constructed with the same architectural features and the same height, it will be quite boring and ultimately uninteresting. After all, this will be one of the first buildings (developments) the general public will see as they enter West Hollywood from the West and I think it's very important for the City and the developer to present the right image.

3. The flow of traffic into and out of the project will be of paramount importance. Assuming the primary entrance/exit will be on Santa Monica Boulevard then there must be a way for traffic to enter the project from Santa Monica Blvd. traveling West and then exiting from the project to head West on Santa Monica. This will involve the reconfiguration of the landscape meridian and the coordination of the traffic signals.

If the City insures that these and all other matters related to the project are carefully considered then I firmly believe the project can be very successful and at the same time a compliment to the City and the surrounding neighborhood.

Sincerely,

STAFFORD COMMERCIAL



Ted Stafford
President

March 12, 2012

Mr. David DeGrazia
Senior Planner
West Hollywood City Hall
8300 Santa Monica Boulevard
West Hollywood, CA 90069

RE: Notice of Preparation for Melrose Triangle Project/ The 9080 Building

Dear Mr. DeGarzia,

The Art Deco Society of Los Angeles would like the following points considered relating to the above project to be considered during the environmental review process.

It would appear that the proposed project would demolish the 9080 building. The proposed uses indicated are retail, art galleries, design showrooms and restaurant services. The current building would serve all these uses with very little alterations that impact the character of the building not to mention total demolition.

- The building was originally constructed in 1928 in the architectural Streamline Moderne Style.

- The building contains many character defining features of the Streamline Moderne Style including smooth wall and curved surfaces, horizontal banding, intact glass block incorporated for natural light and ventilation and unique entry door frame and canopy.

- Although the Streamline Moderne Style was popular throughout the Los Angeles region, very little of the architectural style exists in West Hollywood.

- The DEIR should provide alternatives that reuse the building or examine alternatives that would protect the charter defining features of the Streamline Moderne Style.

- The building appears to be eligible for further historic resource consideration.

Additionally, we strongly suggest that alternatives including a more environmentally sensitive project that would include adaptive reuse options be considered as part of the DEIR which demonstrate an attempt to avoid demolition of the 9080 Building while serving the over all project objectives. We look forward to your response and further dialog for protecting this wonderful Streamline Moderne building.

The Art Deco Society of Los Angeles truly appreciates the City of West Hollywood attention regarding managing the built environment. The City enjoys a wonderful reputation toward identifying and protecting historic and cultural resources.

Sincerely,

John W. Thomas
President
Art Deco Society of Los Angeles

**P.O. Box 972 Hollywood, CA 90078 (310) 659-3326**
**Email ArtDecoLA@sbcglobal.net**

DONALD R. EPSTEIN

March 2, 2012

David de Grazia
Senior Planner
City of West Hollywood
8300 Santa Monica Blvd.
West Hollywood, CA 90029-6219

Re: Melrose Triangle Proposal Development

Dear David,

I am the owner of numerous commercial properties on the corners of Melrose and Almont. One of them is directly across the street from the proposed development site. I am not opposed to the development project as it has been proposed AS LONG as the City will provide the following guidelines for the developer and protects the interests of the adjacent property owners and the neighborhood.

1. As the triangle has significant frontage on the three major streets in West Hollywood, therefore the project must have pedestrian friendly commercial businesses open to the public on each of the three streets in order to create a healthy synergy between the project and the existing surrounding neighborhood. It should have properly landscaped pedestrian entrances spaced at appropriate intervals on each of the three streets to encourage the flow of pedestrian traffic from the neighborhood in the project and conversely from the project into the neighborhood.

2. The flow of traffic in and out of the project will be of paramount importance. Assuming the primary entrance/exit will be on Santa Monica Boulevard, there must be a way for traffic to enter the project from the street traveling West and then exiting from the project heading West on Santa Monica Boulevard. This will involve reconfiguring the landscape meridian and the coordination of the traffic signals.

If the City insures that these and all other matters related to the project are carefully considered then I firmly believe the project can be very successful and at the same time, a compliment to the City and surrounding neighborhood.

Respectfully,

Donald Epstein
Property Owner
606 N. Almont
8920 Melrose Avenue

625 N. Palm Drive Beverly Hills, CA 90210 (310)275-1818 Phone

8999 Keith Avenue
West Hollywood, CA 90069

March 11, 2012

David DeGrazia
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069

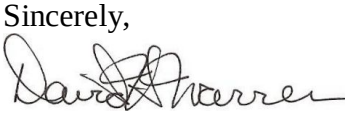
Dear David:

Writing as a resident, I believe the Melrose Triangle EIR should answer these questions:

1. *Traffic operations*
    a. Does the SMB/Almont intersection have enough room to hold the extra cars turning from northbound Almont to westbound SMB during peak hours? Where will they go when westbound traffic is stopped and the block between Almont and Doheny is already filled with cars (sometimes extending into the intersection)? Will eastbound SMB be blocked by cars trying to make this turn?
    b. Will westbound SMB drivers have sufficient opportunity to make the left turn onto Almont to reach the project, given the peak-period back-ups on eastbound SMB and the lack of a left-turn signal?
    c. Will cars using—or queuing for—the SMB entrance block eastbound SMB traffic?
    d. Will traffic signal timing need to change at SMB/Almont or SMB/Doheny? Will that increase delays for other travelers?
2. *Traffic volume*
    a. Will there be a significant impact on the SMB/Almont intersection?
    b. Will there be a significant impact on Nemo, Harland, Willey (SMB to Keith), or Keith? Nemo is the obvious shortcut to northbound Doheny. Willey is the start of a back route to eastbound Fountain.
3. *Parking in residential areas*
    a. Will the project affect the availability of daytime parking in nearby neighborhoods? For example, if workers and visitors don't have free parking at Melrose Triangle, will they park on streets like Harland?
    b. If so, what will the mitigation be?

Thank you.

Sincerely,



David Warren

**WEST HOLLYWOOD WEST RESIDENTS ASSOCIATION**
PO Box 691427
West Hollywood, CA 90069

E-mail: president@whwra.org; whwra90048@gmail.com

*via email*

March 7, 2012

Mr. David DeGrazia
Senior Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069

**RE: Melrose Triangle Project — DEIR Scoping**

Dear David:

Attached please find issues we'd like studied for the new Draft Environmental Impact Report for the Melrose Triangle project.

Thank you for giving West Hollywood West Residents Association the opportunity to submit our questions and concerns.

Sincerely,

*Padi Moschetta*

Padi Moschetta
President
West Hollywood West Residents Association

Cc: John Keho, Planning Manager - City of West Hollywood
Doug Carstens, Chatten-Brown & Carstens

# MELROSE TRIANGLE DEIR — SCOPING/NOP

Public Services and Utilities

The suppliers that respond to the DEIR inquiry – e.g., SCE, Beverly Hills Water, Athens, only address how they would provide service. They do not typically address current or potential issues with providing that service; e.g., energy or water shortages, conservation, alternative energy sources, availability of nearby landfills, etc. Nor do they address the cumulative impact of satisfying / adding additional demand and/or capacity to sometimes already overextended services. A number of these services have proven to have serious reliability issues for existing customers; how will this new project affect reliability? We'd request hard data; not speculative assumptions. The environmental impacts of this increased demand should be fully listed, evaluated and discussed in the DEIR.

Southern California Edison — We would like to know how many outages have occurred in West Hollywood West in the last 5 years and how many were planned versus not planned.

What are the environmental impacts of increasing production, supply, use and delivery?

Southern California Gas — What are the environmental impacts of increasing production, supply, use and delivery?

City of Beverly Hills Water — What impact will this increased use have on diminishing supplies of water and on existing customers who are being asked to conserve?

Athens Waste — LA landfills in and around Los Angeles are full. Have the governmental agencies, residents, business owners of Calabasas, Chiquita Canyon and Puente Hills been contacted to gather their feedback regarding additional waste being dumped in their respective areas?

Need analysis of trips or traffic along routes to those areas where Athens will have to travel. What are the environmental impacts of increasing waste production, transportation and disposal including impacts relating to increased transit (e.g., air quality and traffic)?

Air Quality

What is the project's operational impact on air quality long-term?

How will increased traffic caused by this development affect air quality?

Land Use Planning / Long Term Implications of the Project

Due to the project's size, location, proximity and the potential for impacts, we believe the thresholds of significance and land use consistency analysis need to specifically address impacts upon Beverly Hills, which has jurisdiction over land immediately adjacent to the west and northwest.

Growth-inducing Impacts

Due to the project's location, prominence and influence, the DEIR must also consider consistency of the project with the Melrose corridor and the Robertson corridor in addition to the Santa Monica Boulevard corridor.

There should be a specific analysis on the cumulative compounded impacts created by this project and the Palm project, which has been approved for the north side of the same major corner. What synergies and/or compounded impacts are created during construction and during operation of two developments that will geometrically expand the intensity of use at this intersection in the City and within the region?

Intuitively, we know that a project of this size and scope will cause an increase of growth around it. We believe it will set a precedent and a pattern that will lead to increased pressure for growth, density and intensification of use along every major street emanating from this key corner including Santa Monica Boulevard, Melrose, Doheny, Almont, Robertson, San Vicente, and Beverly Blvd among others. This effect needs to be fully analyzed.

How will the development impact the City's Avenues of Arts and Design or other business and cultural resources? We request an analysis of the effect of this kind of increasing pressure and intensification on small family-owned businesses and uses that currently thrive and depend upon easy access in the immediate vicinity.

What environmental impact will this increase of households have on: services, public safety, roads, trip generation, etc? Further, what is the specific cumulative impact of this increase in households when considered with the Palm project and other approved and/or proposed projects?

We request a special section that specifically evaluates comprehensive environmental impacts from concurrent projects (i.e., Palm Project, Doheny/Sunset project and Melrose Triangle) located within close proximity to one another and surrounding the same critical intersections.

The 'Cumulative Projects within the City of West Hollywood' needs to list actual total square footage numbers for each project -- both residential and commercial portions of projects, not just commercial. We request the completion of a Cumulative Impacts section that fully aggregates all of the cumulative impacts and provides a comprehensive environmental analysis of impacts and mitigations, if any.

Traffic and Circulation

We'd like an in-depth analysis of major streets and alleys within a half-mile of the project, including those in Beverly Hills and LA, based on recent, realistic numbers (i.e, not collected during the summer, or on holidays, or on a Sunday).

We'd like the study to include traffic on the alley parallel to (just east of) Doheny (from Melrose to Rosewood) and the alley parallel to (just south of) Melrose (from Robertson to Almont). Both of these alleys are currently being used as roadways. Please provide detail about existing use and possible mitigations.

Please address local cut-through traffic/avoidance traffic during routine use, during peak-hours. Please provide detail about existing use and possible mitigations.

In the previous Melrose Triangle DEIR charts, sometimes they used V/C figures and sometimes they used Delay. This was very confusing and we can only assume they used the number that was the more optimistic/favorable of the two. Please feel free to give us both sets of numbers.

In the previous Melrose Triangle DEIR charts, gross averages were used versus peak-hour level of service. Gross averages do not reveal the peak-hour level of service. Gross averages can actually mask peak impacts. We would specifically request that peak-hour data be provided. We would like to see charts by peak-hour level of service for am and pm.

We would like data that show us what happens after "F."

What happens to the existing valet parkers who will be displaced during construction? Where will they park all of the cars in the evening?

What traffic calming devices are being proposed for Melrose and surrounding streets?

Noise

Noise from the Robertson clubs can reach Rangely, so please study noise anticipated from the Melrose Triangle and recommended mitigations.

Please address noise from uses (commercial tenants, residential tenants and business patrons), vehicular noise (garbage truck, delivery trucks, tenants'/residents' autos, etc.)

What noise levels are expected from the mechanical equipment on the roof?

Will any of the roof be occupied space (like a roof top terrace) and the possible source for noise?

Please address how noise will impact all local streets, including Almont, which is closest to a major ingress/egress area of the project.

Geology and Hydrology

Please study the effects of excavation, including potential subsidence. We've seen it at other nearby areas, such as the Sherbourne/Ashcroft cul-de-sac (i.e., a result of the San Vicente Boulevard storm drain construction).

What is the specific fallback position if they encounter too much water to complete the project as designed? What happens if and when this building becomes so damp as to pose a public health concern?

What are the proposed truck routes for excavation? What are the impacts of the trucks on traffic? What are the impacts of the trucks on the physical roadways?

Will they be using diesel trucks? If so, what are the impacts of the diesel from the trips on our air quality? Is there any consideration of using non-diesel trucks and/or zero-pollution vehicles and if so, how would their impact compare to diesel trucks?

Since this is a highly seismic area, please study how an earthquake might affect the area once water removal has begun or, once dry, after it has been rehydrated?

It is our understanding that the groundwater flow goes Southeast. How will excavation and 3 levels of underground parking impact the West Hollywood West area?

We know empirically that this site overlays a major underground water system that had sufficient reliable flow to supply the Beverly Hills Water Department water wells on La Cienega for close to a century. Please describe this system including source watershed, source flows, routes and dimensions of major aquifers and rivers, flow rates, directional flows, and pressures, and the impacts of its interference.

Please study surface runoff and the impacts of the project on surface runoff. The existing structures contain many varieties of surfaces that hold, diffuse and redirect runoff. The proposed project is more monolithic and would appear to have more impervious surfaces.

We believe there needs to be a complete evaluation of surface water flows, particularly impacts upon gutters and storm channels. Will the project have any impact upon areas downstream? Will increase surface run-off exacerbate surface flows?

Due to the topography and grade, area gutters and storm drains are known to overflow during heavy rains and rainy seasons. Is there capacity for extra runoff? How much capacity is there and how much will this project contribute? How much will the project pay to offset this contribution?

Local experience with the high groundwater table is extensive and spans periods of drought and deluge. It has, in fact, spawned epic tales locally. There have been numerous reports of special problems in the area owing to the high groundwater table including subsidence, collapse, flooding, flotation, buoyancy, mold, and the discovery and inadvertent dispersal of hazardous and/or toxic substances including but not limited to oil, tar, explosive fumes, gasoline and oil production residue.

These conditions and environmental impacts need to be adequately assessed, described, quantified, evaluated and subsequent mitigation measures discussed in the DEIR.

We know high water table conditions have interfered with construction near Doheny above Sunset causing catastrophic structural collapse and at numerous individual locations covering a large area around the project site below Melrose within the same watershed. We know that some local homeowners and developers attempting to build pools encountered water pressure resistance at shallow depths and the pools could not be constructed in ground. County Flood Control had to import special trenching techniques from Southeast Asia to accommodate such conditions for the installation of major flood control pipelines throughout the area. And we personally observed the trenches fill with water to stasis one foot from the surface despite their technology.

We have empirical local experience that groundwater table levels permanently rose immediately to the north following the construction of the Sofitel Hotel on Beverly Place. We know the Hotel must now pump (dewater) 24 hours a day. It would appear the hydrogeology near the Sofitel is likely part of the same system and features as the project site.

Please provide data or modeling to assess similar impacts related to interference with this major underground water system. What happens should the proposed project act like a dam or a huge impenetrable obstacle across this major water system? Will the neighborhood to the north saturate and flood? How much can we expect the groundwater to rise?

What happens should the neighborhood to the south, where many mature trees draw from the existing water table, go fallow? What is the projected new route of this water system when it is interrupted with this project? What impact will there be to surrounding properties, streets and major public and private assets? What protection is needed to warrant surety, completion, and indemnification for potential damages? And how much variability is caused by actual accumulated seasonal rainfall?

What are the long-term effects of the underground conditions on liquefaction and on the water table?

What is the proposed disposal for the discharged groundwater during construction?

Hazards and Hazardous Materials

Please explain the disposition of the gas tank, oil wells and any remediation that occurred. Removal of the underground gas tank was so long ago, was it certified to current standards? What about previously capped oil wells?

If no remediation has occurred, what impacts are there on the interface with the underground water system?

It is a known fact that there are elevated levels of Arsenic in the soil and groundwater for adjacent Beverly Hills Lots 12 and 13. How will excavation on the Melrose Triangle site impact those sites and what will be done in case of contamination?

Historic/Cultural Resources

We would like more information on the architectural value and history of the "streamline" building. Has it been assessed by local, state and/or federal agencies?

Aesthetics

Will the building be over-lit on the Melrose or Almont side?

Will there be light pollution from the building and the apartments?

What is the signage size on the Melrose and Almont sides of the building?

What is the proposed street lighting going to be?

Is the Doheny - Melrose – Santa Monica corner going to be effectively a "dead" commercial corner space, given all the exposure to traffic noise and lack of pedestrian traffic?

Is the Melrose - Almont corner going to be effectively another "dead" commercial corner space stranded between all the vehicular traffic entering and leaving the building?

What will the resulting shade/shadow be from this proposed building on Santa Monica Boulevard and Melrose Ave.?

Miscellaneous

The public needs to have a list that identifies consultants, including names and companies.

Most importantly, the Appendix needs to be indexed and coordinated with the text in Volume 1, otherwise, it will be impossible to uncover necessary information.