

# Appendix D

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Response to Comments

# Response to Comments

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The Final Initial Study- Negative Declaration (Final IS-ND) and this Response to Comments collectively comprise the Final IS-ND for the 923-931 N. Palm Avenue Senior Congregate Care Facility. All changes made to the Draft IS-ND consisted of minor typographical corrections or minor working changes and have been incorporated directly into the text. Updated floor plan figures have also been included. No substantive corrections or revisions were made. These edits do not individually or collectively comprise a substantial revision as defined in the CEQA Guidelines and do not affect the conclusions of the IS-ND.

## *Comments and Responses*

The Draft IS-MND was circulated for a 20-day public review period that began on April 6, 2017 and concluded on April 26, 2017. The City of West Hollywood received three comment letters from public agencies and has prepared written responses to the comments received.

The comment letters have been numbered 1 through 3. Each issue within a comment letter, if more than one, has also been numbered and is marked on the comment letter in the right-hand margin. Each comment letter is reproduced in its entirety. The commenters and page numbers on which each commenter's letter appear are listed below.

Letter No. and Commenter	Page No.
1 Lijin Sun, Program Supervisor, CEQA IGR, South Coast Air Quality Management District	2
2 Adriana Raza, Customer Service Specialist, Facilities Planning Department, County Sanitation Districts of Los Angeles	5
3 Michael Takeshita, Acting Chief, Forestry Division, County of Los Angeles Fire Department	8
4 Sergio A. Aloma, Captain, West Hollywood Station, County of Los Angeles Sheriff's Department	15



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

April 20, 2017

[acastillo@weho.org](mailto:acastillo@weho.org)

Mr. Antonio Castillo, Associate Planner  
City of West Hollywood  
Community Development Department  
8300 Santa Monica Boulevard  
West Hollywood, CA 90069

## Negative Declaration (ND) for the Proposed 923-931 North Palm Avenue Senior Congregate Care Facility Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final ND.

### Project Description

In the project description, the Lead Agency proposes to demolish the existing residential structures on the approximately 0.44-acre site, rehabilitate two historically significant bungalows, and construct a four-story senior living facility with a total of 49 units. The proposed project would include a subterranean parking level with 25 spaces. The overall floor area would be approximately 31,398 square feet. The proposed project is surrounded by mostly multi-family residential buildings. Project construction is expected to take approximately six months beginning in September 2017 and completed in February 2018.

1

### Compliance with SCAQMD Rule 1403 during Demolition /Renovation Activities

In the air quality section on page 29 of the ND, the Lead Agency discussed compliance with SCAQMD Rule 403 – Fugitive Dust and Rule 1113 – Architectural Coatings. In the event that asbestos is encountered during demolition and rehabilitation, the Lead Agency should include a discussion to demonstrate compliance with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities in the Final ND.

2

Please provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final ND. SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA IGR Section, at (909) 396-3302, if you have any questions regarding these comments.

3

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.  
Program Supervisor, CEQA IGR  
Planning, Rule Development & Area Sources

LS:GM  
LAC170411-13  
Control Number

## Letter 1

**COMMENTER:** Lijin Sun, Program Supervisor, CEQA IGR, South Coast Air Quality Management District

**DATE:** April 20, 2017

### Response 1.1

The commenter acknowledges the opportunity to comment and provide guidance and provides a brief summary of the project description. No response is necessary.

### Response 1.2

The commenter states that the lead agency should include a discussion to demonstrate compliance with SCAQMD Rule 1403-Asbestos Emissions from Demolition/Renovation Activities in the Final ND. As recommended, the IS-ND has been revised to include a discussion of project compliance with SCAQMD Rule 1403. The following was added to Section 3, Air Quality, under the discussion of checklist items 3(b),(c), and (d):

### Lead and Asbestos

Due to the age of the existing bungalows on-site (over 100 years old), there is the potential for asbestos and lead to be emitted into the air during their demolition (923 N. Palm Avenue) or rehabilitation (927 and 931 N. Palm Avenue); demolition of the rear additions to the 923 N. Palm Avenue bungalow and the two rear garages on 927 and 931 N. Palm Avenue may also release lead and asbestos. Lead-based materials are regulated by the California Occupational Safety and Health Administration (Cal OSHA). The California Code of Regulations (CCR), §1532.1, requires testing, monitoring, containment, and disposal of lead-based materials such that exposure levels do not exceed Cal OSHA standards. Under this rule, construction workers may not be exposed to lead at concentrations greater than fifty micrograms per cubic meter of air averaged over an eight-hour period and exposure must be reduced to lower concentrations if the work day exceeds eight hours. Similarly, CCR §1529 sets requirements for asbestos exposure assessments and monitoring, methods of complying with exposure requirements, safety wear, communication of hazards, and medical examination of workers.

Asbestos is categorized as a hazardous air pollutant by the U.S. EPA (SCAQMD 2017). They are regulated at the federal level under the Clean Air Act, at the state level under Cal OSHA, and at the local level by SCAQMD. Federal asbestos requirements are listed under the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) (Code of Federal Regulations [CFR] Title 40, Part 61, Subpart M), and require the control of asbestos during the renovation and demolition of buildings. The asbestos NESHAPs require a thorough inspection for asbestos where demolition will occur and specifies work practices to control emissions, such as removing all asbestos-containing materials, adequately wetting all regulated asbestos-containing materials, sealing the material in leak tight containers and disposing of the asbestos-containing waste material as expediently as practicable (U.S. EPA 2016). At the state level, CCR §1529 sets requirements for asbestos exposure assessments and monitoring, methods of complying with exposure requirements, safety wear, communication of hazards, and medical examination of workers. At the local level, SCAQMD Rule 1403 establishes survey requirements, notification, and work practice requirements to prevent asbestos emissions from being released during renovation and demolition activities. Rule 1403 incorporates NESHAP requirements and SCAQMD has the authority to enforce the federal asbestos NESHAP and is responsible for enforcement at a local level.

The project would be required to comply with all applicable federal, state, and local regulations pertaining to lead and asbestos. This would reduce potential impacts associated with exposure of sensitive receptors to lead and asbestos to a less than significant level.

A discussion of project compliance with SCAQMD Rule 1403 and potential impacts pertaining to asbestos exposure was also included in Section 8, Hazards and Hazardous Materials:

As previously discussed in Section 3, Air Quality, demolition and rehabilitation of structures on the project site has the potential to release lead-based materials and asbestos due to the age of the existing structures. However, lead exposure is regulated at the state level under CCR §1532.1 by Cal OSHA, and asbestos exposure is regulated at the federal, state, and local level under CFR Title 40, Part 61, Subpart M, CCR §1529, and SCAQMD Rule 1403, respectively. The project would be required to comply with all applicable regulations, which would reduce potential impacts due to accidental release of lead and asbestos to a less than significant level.

The following revision was also made under the discussion of checklist item 8(c):

As mentioned above, operation of the proposed project would not involve the use or transport of hazardous materials and the project would be required to comply with federal, state, and local regulations to control exposure to lead and asbestos.

### Response 1.3

The commenter requests that the lead agency provide written responses to all comments provided in the letter prior to adoption of the Final ND. The lead agency is not required to provide a formal response to comments for an IS-ND. Comment letters and responses to comments are included in the appendix of the Final IS-ND and will be available to view on the City of West Hollywood's website, [www.weho.org](http://www.weho.org).



# 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 HYDE  
Chief Engineer and General Manager

April 25, 2017

Ref. Doc. No.: 4114206

Mr. Antonio Castillo, Associate Planner  
Community Development Department  
City of West Hollywood  
8300 Santa Monica Boulevard  
West Hollywood, CA 90069-6216

Dear Mr. Castillo:

**Response to NOI for  
the 923 – 931 North Palm Avenue Senior Congregate Care Facility Project**

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) for the subject project on April 17, 2017. The proposed project is located within the jurisdictional boundary of District No. 4. We offer the following comments regarding sewerage service:

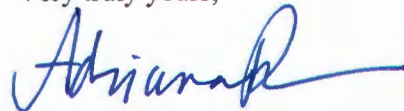
1. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Sherman Relief Trunk Sewer, located in Palm Avenue just north of Santa Monica Boulevard. The Districts' 18-inch diameter trunk sewer has a capacity of 4.1 million gallons per day (mgd) and conveyed a peak flow of 1 mgd when last measured in 2013. 1
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. 2
3. The expected increase in average wastewater flow from the proposed project, described as 48 senior living spaces, one single family dwelling unit, and 1,567 square feet of clinic space, is 3,369 gallons per day. For a copy of the Districts' average wastewater generation factors, go to [www.lacsd.org](http://www.lacsd.org), Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link. 3
4. The Districts are empowered 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 for increasing the strength or quantity of wastewater discharged from connected facilities. 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 more information and a copy of the Connection Fee Information Sheet, go to [www.lacsd.org](http://www.lacsd.org), Wastewater & Sewer Systems, click 3

on Will Serve Program, and search for the appropriate link. In determining the impact to the Sewerage System and applicable connection fees, the Districts' Chief Engineer will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at (562) 908-4288, extension 2727.

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the 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,



Adriana Raza  
Customer Service Specialist  
Facilities Planning Department

AR:ar

## Letter 2

**COMMENTER:** Adriana Raza, Customer Service Specialist, Facilities Planning Department,  
County Sanitation Districts of Los Angeles

**DATE:** April 25, 2017

### Response 2.1

The commenter provides information about infrastructure that would serve the project's wastewater flows and directs questions regarding sewerage service for the proposed project to the City of Los Angeles' Department of Public Works. No issue is raised and no response is needed.

### Response 2.2

The commenter states that the expected increase in average wastewater flow from the proposed project, based on 48 senior living spaces, one single family dwelling unit, and 1,567 square feet of clinic space is 3,369 gallons per day. The commenter's calculations incorporated a slight revision in professional building space from 1,520 square feet to 1,567 square feet, and also utilized different average wastewater generation rates and user categories based on Ordinance No. 37 for County Sanitation District No. 4 of Los Angeles County. This provided a lower estimate for project wastewater generation than that presented in the Draft IS-ND (6,800 gallons per day). The Final IS-ND has been revised to include the change in professional building space, which resulted in a minor increase in estimated project wastewater generation (6,814 gallons per day), but no revisions to the wastewater generation rates have been made as the generation rates used provide a more conservative estimate of wastewater generation and are also valid.

### Response 2.3

The commenter asserts that the County of Los Angeles Sanitation Districts will require payment of a connection fee prior to issuing a permit. The project applicant will pay any required connection fee set by the Districts.

### Response 2.4

The commenter explains that the capacities of the wastewater treatment facilities are based on regional growth forecasts by the Southern California Association of Governments (SCAG), and that the Districts' facilities must be sized and phased in a manner consistent with regional growth forecasts. As such, available capacity will be limited to levels that correspond to the approved growth, and the comment letter does not constitute a guarantee of wastewater service. The City acknowledges that the letter does not guarantee wastewater service and will work with the Districts to coordinate wastewater service for the project.





COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

April 27, 2017



Antonio Castillo, Associate Planner
City of West Hollywood
Community Development Department
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Dear Mr. Castillo:

NOTICE OF INTENT TO ADOPT A NEGATIVE DECLARATION, "SENIOR CARE CONGREGATE CARE FACILITY," INVOLVES THE DEMOLITION OF AN EXISTING RESIDENCE AND CONSTRUCT A NEW FOUR-STORY SENIOR CONGREGATE CARE FACILITY BUILDING AND WOULD REHABILITATE AND INCORPORATE THE TWO EXISTING HISTORIC BUNGALOWS, IT WOULD PROVIDE A TOTAL OF 49 SENIOR UNITS, LAUNDRY FACILITIES, AND BEAUTY SALON/BARBERSHOP FOR RESIDENTS, 923-931 NORTH PALM AVENUE, WEST HOLLYWOOD, FFER 201700042

The Notice of Intent to Adopt a Negative Declaration 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:

We have no comments.

LAND DEVELOPMENT UNIT:

- 1. The proposed development may necessitate multiple ingress/egress access for the circulation of traffic and emergency response issues.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

Table listing various cities and areas served by the fire department, including Agoura Hills, Artesia, Azusa, Baldwin Park, Bell, Bell Gardens, Bellflower, Bradbury, Calabasas, Carson, Cerritos, Claremont, Commerce, Covina, Cudahy, Diamond Bar, Duarte, El Monte, Gardena, Glendora, Hawaiian Gardens, Hawthorne, Hidden Hills, Huntington Park, Industry, Inglewood, Irwindale, La Canada-Flintridge, La Habra, La Mirada, La Puente, Lakewood, Lancaster, Lawndale, Lomita, Lynwood, Malibu, Maywood, Norwalk, Palmdale, Palos Verdes Estates, Paramount, Pico Rivera, Pomona, Rancho Palos Verdes, Rolling Hills, Rolling Hills Estates, Rosemead, San Dimas, Santa Clarita, Signal Hill, South El Monte, South Gate, Temple City, Walnut, West Hollywood, Westlake Village, and Whittier.

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. Specific fire and life safety requirements for the construction phase will be addressed at the building fire plan check. There may be additional fire and life safety requirements during this time.
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 Department requirements for access, fire flows, and hydrants are addressed during the building permit stage.
6. 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.
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. 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. 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. 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 fire hydrant.
  - c) When cul-de-sac depth exceeds 200 feet hydrants will be required at the corner and mid-block.

- d) Additional hydrants will be required if the hydrant spacing exceeds specified distances.
12. 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.
  13. All on-site driveways shall provide a minimum unobstructed width of 28 feet clear-to-sky. The 28-foot width does not allow for parking and shall be designated as a "Fire Lane" and have appropriate signage. The centerline of the on-site driveway shall be located parallel to and within 30 feet of an exterior wall on one side of the proposed structure. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building.
  14. The 28 feet in-width shall be increased to:
    - a) 34 feet in-width when parallel parking is allowed on one side of the access way.
    - b) 36 feet in-width when parallel parking is allowed on both sides of the access way.
    - 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.
  15. All access devices and gates shall comply with California Code of Regulations, Title 19, Articles 3.05 and 3.16.
  16. 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.
17. 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.
18. 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.

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

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

The statutory responsibilities of the County of Los Angeles Fire Department's 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.

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The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

Antonio Castillo, Associate Planner  
April 27, 2017  
Page 6

**HEALTH HAZARDOUS MATERIALS DIVISION:**

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments or requirements for the project at this time.

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

Very truly yours,



MICHAEL Y. TAKESHITA, ACTING CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

MYT:ac

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## Letter 3

**COMMENTER:** Michael Takeshita, Acting Chief, Forestry Division, County of Los Angeles Fire Department

**DATE:** April 27, 2017

### Response 3.1

The County of Los Angeles Fire Department acknowledges that the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Divisions have reviewed the project and offer their comments. No response is needed.

### Response 3.2

The Planning Division has no comments. No response is needed.

### Response 3.3

The Land Development Unit of the County of Los Angeles Fire Department provides a list of requirements and recommendations to ensure that the project provides adequate emergency access and is designed to be compatible with the fire code and promote the safety of future and existing residents. The City will ensure that the project applicant will comply with all applicable standards and consider the recommendations of the Fire Department.

### Response 3.4

The Forestry Division of the County of Los Angeles Fire Department states that potential impacts pertaining to erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archaeological and cultural resources, and the County Oak Tree Ordinance be addressed. The IS-ND addresses these issues in the following sections:

- Erosion control: Section 6, *Geology and Soils* and 9, *Hydrology and Water Quality*
- Watershed management: Section 9, *Hydrology and Water Quality*
- Rare and endangered species, vegetation: Section 4, *Biological Resources*
- Archaeological and cultural resources: Section 5, *Cultural Resources*

The following issues are not applicable to the project:

- Fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4: The project does not lie in Fire Zone 4 (see Section 8, *Hazards and Hazardous Materials*).
- County Oak Tree Ordinance: There are no trees on the project site that qualify for protection under the County's oak tree ordinance.

### Response 3.5

The Health Hazardous Materials Division has no comments. No response is needed.

# OFFICE OF THE SHERIFF



COUNTY OF LOS ANGELES

HALL OF JUSTICE

JIM McDONNELL, SHERIFF

May 5, 2017

Antonio Castillo, Associate Planner  
City of West Hollywood  
Community Development Department  
8300 Santa Monica Boulevard  
West Hollywood, CA 90069

Dear Mr. Castillo:

**REVIEW COMMENTS  
INITIAL STUDY NEGATIVE DECLARATION  
923-931 NORTH PALM AVENUE  
SENIOR CONGREGATE CARE FACILITY PROJECT**

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the Initial Study/Negative Declaration (IS/ND), dated April 2017, for the 923-931 North Palm Avenue Senior Congregate Care Facility Project (Project). The proposed Project will demolish certain existing buildings rehabilitate two historic buildings, and construct a four-story senior care facility with an overall floor area of 31,398 square feet. The senior care facility will provide 49 units, as well as dining, kitchen, laundry facilities, recreation space, exercise rooms, parking, and related amenities. The proposed Project is expected to accommodate a resident population of 66 persons, and would generate a total of 105 daily vehicle trips.

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The proposed Project is located within the service area of the Department's West Hollywood Station (Station). Accordingly, the Station reviewed the IS/ND and authored the attached review comments (see correspondence from Captain Sergio A. Aloma, dated April 27, 2017).

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For future reference, the Department provides the following updated contact information for all requests for review comments, law enforcement service information, California Environmental Quality Act documents, and other related correspondence:

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211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —



Mr. Castillo

- 2 -

May 5, 2017

Tracey Jue, Director  
Facilities Planning Bureau  
Los Angeles County Sheriff's Department  
4700 Ramona Boulevard, Fourth Floor  
Monterey Park, California 91754

Attention: Maynora Castro, Facilities Planner II  
MGCastro@lasd.org

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Should you have any questions, please contact me at (323) 526-5657, or your staff may contact Ms. Maynora Castro of my staff at (323) 526-5578.

Sincerely,

JIM McDONNELL, SHERIFF



Tracey Jue, Director  
Facilities Planning Bureau

Mr. Castillo

- 3 -

May 5, 2017

TJ:MC:mc/mm

Attachment

c: Sergio Aloma, Captain, West Hollywood Station (WHS)  
Lance Eddins, Sergeant, WHS  
David Culver, Assistant Director, Facilities Planning Bureau (FPB)  
Meghan Wang, Supervising Facilities Project Manager, FPB  
Maynora Castro, Departmental Facilities Planner II, FPB  
Chrono  
(EIR-Senior Congregate Care Facility)

COUNTY OF LOS ANGELES  
**SHERIFF'S DEPARTMENT**

*A Tradition of Service*

DATE: April 27, 2017

OFFICE CORRESPONDENCE

FILE NO.



**FROM:** SERGIO A. ALOMA, CAPTAIN  
WEST HOLLYWOOD STATION **TO:** TRACEY JUE, DIRECTOR  
FACILITIES PLANNING BUREAU

**SUBJECT: REVIEW COMMENTS ON THE NEGATIVE DECLARATION FOR THE  
923-931 NORTH PALM AVENUE SENIOR CONGREGATE CARE  
FACILITY PROJECT**

According to Section 14 of the IS/ND, the proposed Project is expected to have a less than significant impact on law enforcement services provided by the Station. The Station generally concurs with this assessment, because the net increases in Project-related population and traffic generation are relatively minor.

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Nonetheless, the Station remains concerned that continued development within the City will ultimately contribute to a significant cumulative impact on our ability to maintain adequate levels of law enforcement services. For example, the Station is currently seeking the addition of six deputy personnel as a result of recent development within our service area. The additional personnel will be distributed evenly between the Station's three daily patrol shifts. Meeting anticipated growth in demand will require the dedication of attendant assets as well (patrol vehicles, other support vehicles, communications equipment, weaponry, office furniture, computer hardware, etc.). Also, the Station itself is an aged and undersized structure that has been operating above capacity for many years. In order to accommodate additional staff and assets, the Station will require substantial modernization, expansion, or replacement.

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Thank you for including the Station in the environmental review process for the proposed Project. Should you have questions of the Station regarding this matter, please contact me or any member of my operations staff at (310) 855-8850.

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SAA:LBE:lbe

## Letter 4

**COMMENTER:** Sergio A. Aloma, Captain, West Hollywood Station, County of Los Angeles Sheriff's Department

**DATE:** April 27, 2017

### Response 4.1

The County of Los Angeles Sheriff's Department provides a summary of the project. No response is needed.

### Response 4.2

The Department states that the project site is within the service area of the Department's West Hollywood Station and that the Station has provided additional review and comments. No response is needed

### Response 4.3

The Department provides updated contact information for future requests. No response is needed.

### Response 4.4

Captain Aloma concurs with the finding that the Project would have a less than significant impact on law enforcement services because the net increase in population and traffic generation resulting from the project would be relatively minor. No response is needed.

### Response 4.5

The commenter expresses the Station's concern that continued development will ultimately contribute to a significant cumulative impact on the Station's ability to maintain adequate levels of law enforcement services. The Station is currently seeking new staff and anticipates the need to acquire more equipment and supplies (e.g., patrol vehicles, communications equipment) to meet the needs of future growth, as well as expand, replace, or substantially modernize the existing Station.

The City acknowledges that continued development would impact the Station's ability to provide adequate levels of law enforcement services with current levels of resources. However, as stated above, the project would result in a minor increase in population that falls within population growth projections utilized in the City's planning efforts. The environmental impact report (EIR) for the City's 2035 General Plan finds that adherence to and implementation of applicable General Plan policies, along with implementation of Mitigation Measures 3.12-1 through 3.12-8 would reduce impacts to police protection due to cumulative development to a less than significant level. Because the project falls within the scope of growth considered in the City's General Plan, the project would have a less than significant cumulative impact in this issue area.