



August 27, 2013

Los Angeles City Council

City Hall, Room 395
200 N. Spring Street
Los Angeles, CA 90012

**Re: Council File Nos.: 13-0876 & 13-0876-S1
Response to Appeals of Highland Park Transit Village Mitigated Negative Declaration (MND)
(ENV-2013-221-MND)**

Dear President Wesson and Honorable Councilmembers:

The following letter responds to concerns that have been raised by the appellants and others in the above matter with respect to certain environmental and other impacts of the Highland Park Transit Village Project. These concerns have been raised in correspondence which was submitted at and following the PLUM Committee meeting on August 13, 2013.

Community Impact Statement from the Historic Highland Park Neighborhood Council dated August 13, 2013 and August 22, 2013:

These communications repeat the same statements made by the Historic Highland Park Neighborhood Council in its comment letter on the MND that was submitted to the Zoning Administrator on April 9, 2013. All of the comments in these communications were responded to in our letter dated April 22, 2013.

Communication from Appellant dated August 13, 2013:

Many of the comments in this communication have been raised previously, and will be briefly responded to.

- Reduced parking will hurt local businesses. The Applicant submitted a parking study to the PLUM Committee that showed that public parking in the area was underutilized. Construction will be phased to minimize construction parking impacts and construction workers will be required to park off-site in private parking areas.
- Daily wetting of the construction site will create erosion and runoff into the Arroyo Seco. The Project is required by law to comply with SCAQMD Rule 403 — Fugitive Dust, which requires the watering of soil during construction to minimize construction-related dust and particulate matter. The wetting of the soil would be conducted as needed to prevent dust and particulate mater from becoming airborne. The soil will

25000 Avenue Stanford, Suite 209
Santa Clarita, CA 91355
(661) 257-2282 (tel)
(661)257-2272 (fax)

not be inundated and the water will evaporate very quickly. Generally, a construction site is watered two to three times a day to be effective. As such, the watering of the soil would not generate surface water runoff, which would be controlled through compliance with the City's Low Impact Development (LID) Ordinance.

- Overburdened infrastructure will be strained. No infrastructure deficiencies have been identified. Any impacts to schools will be addressed by the project's school fees. The project will comply with all Fire Department and City rules and regulations. Any impacts to parks and recreation facilities would be addressed through the payment of Quimby fees.
- The Route 66 corridor will be impacted. The applicant submitted a photomontage of the project's tallest building as viewed from Figueroa Street, within the context of the surrounding buildings, to the Highland Park-Garvanza HPOZ Board and the PLUM Committee. This photomontage showed that views from Figueroa Street will not be significantly affected. Further, the HPOZ Board determined that the project was compatible with surrounding buildings in terms of mass. Thus, the project would not have any adverse aesthetic impacts upon Route 66.
- Social justice concerns regarding housing. The project will increase the supply of quality, affordable housing in the area.
- Construction will generate diesel exhaust. Mitigation measures have been imposed to minimize impacts from construction emissions to a level of insignificance.
- Water quality and hydrology concerns. The Proposed Project would not increase water runoff and would be required to implement erosion control best management practices (BMPs) in compliance with the City's Low Impact Development (LID) Ordinance. The Project Sites will be required to retain and treat the first ¾ inch of rainfall in a 24-hour period. Thus, the Project will result in reduced stormwater flows as compared to existing conditions and improve the quality of water flowing into the adjacent stormwater infrastructure.
- Historic resources will be impacted. No impacts to historic resources have been identified. The Highland Park-Garvanza HPOZ Board determined that the project's massing and orientation would be in harmony with the scale and massing of existing historic structures in the surrounding blocks and provided a recommendation for approval of the Certificate of Compatibility on March 12, 2013.
- Insufficient parks and open space. The project's impact upon recreation and park facilities has been addressed and will be mitigated to a less than significant level. The PLUM Committee conditioned the Project to require all of the units, including the exempt affordable units, to pay Quimby fees for parks and recreation areas. The expenditure of Quimby fees is limited to a radius from the residential project (e.g., 1 mile for neighborhood parks and 2 miles for community parks) and will come back to the community.

- Housing and population issues. The City Planning Commission determined that the project, which is not high-density, will enhance the community.

Communication from Public dated August 13, 2013:

The concerns raised in this communication regarding water quality and geology are addressed in the attached letter from the project's geotechnical engineers.

CONCLUSION

Based on the information provided above, the project's environmental analysis has complied with the State CEQA Guidelines and no substantial evidence has been submitted that would support a contrary conclusion. Thus, the MND prepared for the project is adequate and conforms to CEQA regulations as it pertains to the proposed project.

Should you have any questions with any of the above information, please do not hesitate to contact me.

Sincerely,

PARKER ENVIRONMENTAL CONSULTANTS



Shane Parker

Attachment: Geocon West Inc., Response To Public Comments Proposed Highland Park Transit Village Marmion Way Between Avenue 56 And Avenue 59 Highland Park District of Los Angeles, CA, August 26, 2013.

CC: *Andie Adame, Craig Lawson and Company
Daniel Falcon, Senior Vice-President, McCormack Baron Salazar
Michael S. Woodward, Attorney at Law*



25000 Avenue Stanford, Suite 209
Santa Clarita, CA 91355
(661) 257-2282 (tel)
(661) 257-2272 (fax)
www.parkerenvironmental.com



Project No. A8622-06-01
August 26, 2013

VIA E-Mail

HPTV Apartments, LP
801 South Grand Avenue, Suite 780
Los Angeles, California 90017

Attention: Daniel Falcon

Subject: RESPONSE TO PUBLIC COMMENTS
 PROPOSED HIGHLAND PARK TRANSIT VILLAGE
 MARMION WAY BETWEEN AVENUE 56 AND AVENUE 59
 HIGHLAND PARK DISTRICT OF LOS ANGELES, CALIFORNIA

Dear Mr. Falcon:

We have reviewed Public Comment referenced as “Communication from Public 08/13/2013” submitted to the Los Angeles City Council Planning and Land Use Management Committee regarding the Highland Park Transit Village Project. The referenced public comment generally describes and editorializes the history of water resources in the area of the Arroyo Seco. With respect to geotechnical considerations, the referenced public comment briefly discusses the following items:

1. Several earthquake faults (shown on three maps) are described as being near the site.
2. Dust control mitigation measures will contaminate the underlying groundwater aquifer.

With respect to Item No. 1: The site is not within a City of Los Angeles Fault Rupture Study Area or within a State of California Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards. There are no local or state requirements to investigate faulting at the site.

No technical references were provided on the fault maps included in the public comment as to the source of the fault locations. The locations of the faults on these maps do not correspond with any known published geologic maps from the California Geological Survey, the U. S. Geological Survey or in published in scientific journals.

The attached figures, prepared by the California Geological Survey, illustrate the locations of known faults in the area. As shown in Figure 1, the York Boulevard Fault and Highland Park Fault are located 2,100 feet and 2,300 feet to the north and west of the site, respectively. These faults are not considered active faults by the California Geological Survey or the City of Los Angeles and do not pose a surface fault rupture hazard. As shown in Figure 2, the nearest active fault to the site is the Raymond Fault located 3,000 feet (0.6 mile) to the north. This fault is included in an Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards and is considered active.

With respect to Item No. 2: Wetting for dust control during construction will mitigate potential negative impacts relating to airborne dust generation during grading. The volume of water necessary for dust control is minimal and will not be in volumes large enough to saturate the soil at the site nor will the dust control measures result in migration of water downward through the onsite soil to the underlying aquifers.

Should you have any questions or if we may be of further service, please contact the undersigned at your convenience.

Very truly yours,

GEOCON WEST, INC.

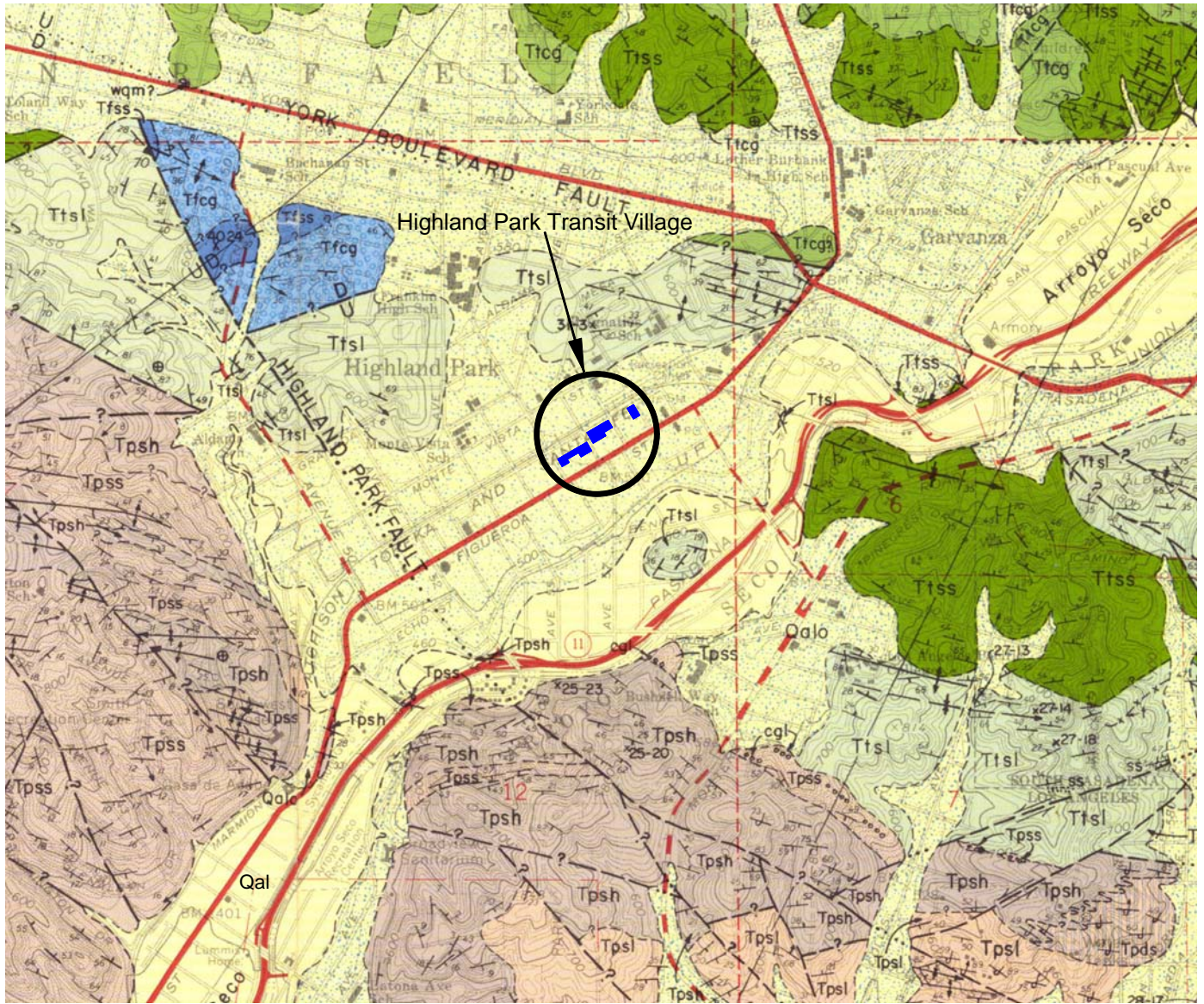


Susan Kirkgard, CEG 1754
Senior Geologist



Gerald Kasman, CEG 2257
Associate / Senior Geologist

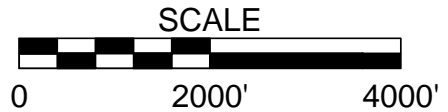
REFERENCE: Lamar, D. L., 1970, Geology of the Elysian Park-Repetto Hills Area, Los Angeles County, California, California Division of Mines and Geology Special Report 101.



LEGEND

- Qal - ALLUVIUM
- Qalo - OLDER ALLUVIUM
- Tfcg - FERNANDO FORMATION: Conglomerate
- Tfss - FERNANDO FORMATION: Sandstone
- Tpsl - PUENTE FORMATION: Siltstone
- Tpsh - PUENTE FORMATION: Shale
- Tpds - PUENTE FORMATION: Diatomaceous shale
- Tpsh - PUENTE FORMATION: Sandstone
- Ttss - TOPANGA FORMATION: Sandstone
- Ttsl - TOPANGA FORMATION: Siltstone
- Ttcg - TOPANGA FORMATION: Conglomerate

- - - - - GEOLGIC CONTACT
- - - - - FAULT (Dashed where approximate, queried where inferred, dotted where concealed)
- ⊕ - STRIKE AND DIP OF BEDDING
- - - - - HORIZONTAL BEDDING
- ⌒ - ANTICLINE
- ∩ - SYNCLINE



GEOCON
WEST, INC.



ENVIRONMENTAL GEOTECHNICAL MATERIALS
3303 N. SAN FERNANDO BLVD. - SUITE 100 - BURBANK, CA 91504
PHONE (818) 841-8388 - FAX (818) 841-1704

REGIONAL GEOLOGIC MAP

HPTV APARTMENTS, LP
HIGHLAND PARK TRANSIT VILLAGE
LOS ANGELES, CALIFORNIA

CHL

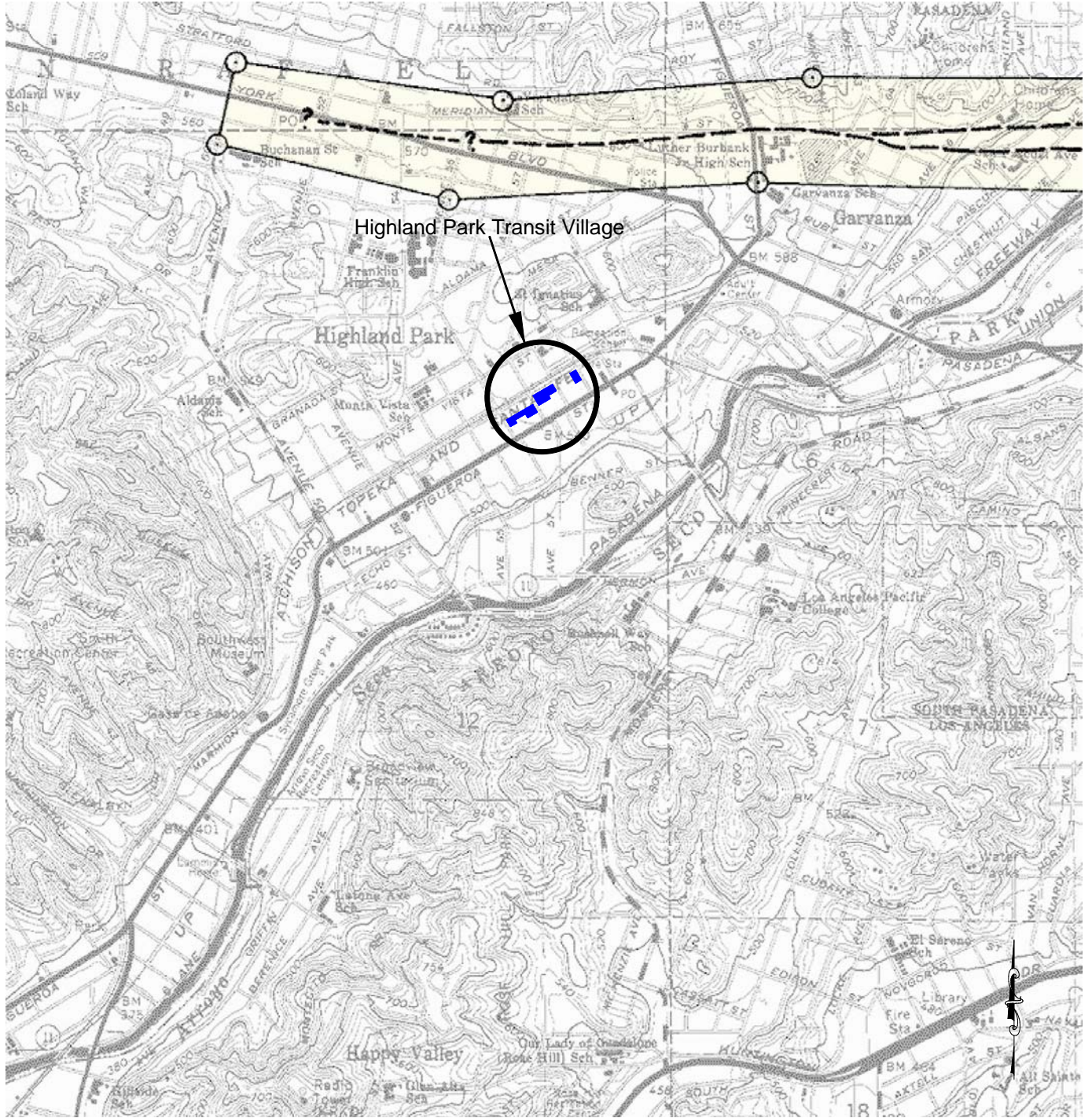
8000

AUG. 26, 2013

PROJECT NO. A8622-06-01

FIG. 1

REFERENCE: California Geological Survey, 1986, State of California Special Studies Zones, Los Angeles Quadrangle, Official Map, Effective: January 1, 1977.



SCALE



0 2000' 4000'

GEOCON
WEST, INC.



ENVIRONMENTAL GEOTECHNICAL MATERIALS
3303 N. SAN FERNANDO BLVD. - SUITE 100 - BURBANK, CA 91504
PHONE (818) 841-8388 - FAX (818) 841-1704

ALQUIST-PRIOLO ZONE MAP

HPTV APARTMENTS, LP
HIGHLAND PARK TRANSIT VILLAGE
LOS ANGELES, CALIFORNIA

CHL

8000

AUG. 26, 2013

PROJECT NO. A8622-06-01

FIG. 2