



April 13, 2017

Via E-Mail and US Mail

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JoJo Pewsawang, City Planning Department
Sharon Dickinson, City Clerk's Office
Los Angeles City Planning and Land Use Management Committee
200 N. Main St., Room 350
Los Angeles, CA 90012

Re: 2136-2148 E. Violet Street: CPC-2016-1706-VZC-HD-SPR & ENV-2016-177-MND;
Council File #17-005

Dear Mr. Pewsawang and Ms. Dickinson:

These comments are submitted by the Natural Resources Defense Council (NRDC) in connection with the proposed project located at 2136-2148 Violet Street, Los Angeles.

CEQA review for this project should be by way of a full EIR, not a mitigated negative declaration. There is, at minimum, a fair argument that traffic and GHG impacts will be significant within the meaning of CEQA and so subject to full analysis. Failure to take this step risks invalidation of the project approvals and the need to start over with environmental review.

As in many urban infill projects, the main environmental impacts will be additional traffic and GHG emissions. Although traffic per se is outside of CEQA, the air emissions associated with traffic are not, and those emissions cannot be forecast accurately if the traffic and associated vehicle miles traveled (VMT) projections are inaccurate.

Here, there is a substantial question whether PM peak hour traffic in the vicinity of the proposed project have been accurately modeled and whether the projected VMT has been calculated correctly. The expert report submitted by Local 11 substantiates this and should not be ignored by your office.

With respect to GHG impacts, it is not enough to compare projected emissions with SCAQMD thresholds in light of recent caselaw, including the Newhall Ranch case, *Center for Biological Diversity v. California Department of Fish and Wildlife*, 62 Cal.4th 204 (2015). Instead, the analysis should include discussion of whether the proposed project is consistent with state GHG reduction policies including AB32, the California Air Resources Board scoping plan and

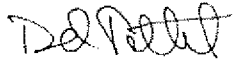
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Executive Orders from the Governor. In the circumstances of this case, it is not appropriate to conduct those analyses in the context of a mitigated negative declaration.

Thank you for your attention to this letter.

Yours truly,



David Pettit
Senior Attorney
Natural Resources Defense Council

Cc: Clare Eberle

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