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October 22, 2018

LETTER TO FILE:

ENV-2017-615-SCEA

Response to Comments

The City of Los Angeles (City) prepared a Sustainable Communities Environmental Assessment (SCEA) and Errata dated October 22, 2018 for the Weingart Projects. The Weingart Projects consists of the development of two project sites identified as Site 1 and Site 2 in the SCEA. Site 1 is proposed to be developed with 382 residential dwelling units, 2,250 square feet of commercial land uses, 25,493 square feet of philanthropic institution land uses, and 32 parking spaces. Of the 382 residential dwelling units, 378 units will be set aside as Restricted Affordable Units and four units designated as Manager Units. Site 2 is proposed to be developed with 303 residential dwelling units, 3,200 square feet of commercial land uses, 17,100 square feet of office land uses, and 212 parking spaces. Of the 303 residential dwelling units, 298 units will be set aside as Restricted Affordable Units and five units will be designated as Manager Units. The errata address minor corrections within the analysis of the proposed haul route and clarifies a requirement of an identified mitigation measure related to transportation and traffic, no changes are proposed to the two Projects as part of this errata.

The original SCEA was released for public comment from September 13, 2018 to October 15, 2018. A joint public hearing held for the proposed Project at Site 1, Case No. CPC-2017-614-GPAJ-ZCJ-HD-SPR and VTT-74852, was held on October 10, 2018 before the Hearing Officer and Advisory Agency.

PUBLIC COMMENTS

During the public comment review period of the SCEA, the Department of City Planning received the following written comments:

1. Los Angeles County Metropolitan Transportation Authority (Metro) dated October 10, 2018
2. Stephanie Burke Wagner dated October 15, 2018
3. Judy Huie dated October 15, 2018
4. Estela Lopez on behalf of the Central City East Association – Los Angeles Downtown Industrial District Business Improvement District dated October 12, 2018
5. Woo Properties dated October 15, 2018

The following provides the City's responses to each of the written comments raised in the comment letters received for the SCEA. Copies of the written comments in their entirety can be found in the administrative record of Case No. ENV-2017-615-SCEA and as part of Attachment A of this letter.

Inquiries regarding the SCEA shall be directed to May Sirinopwongsagon, Planning Staff for the Department of City Planning at (213) 978-1372 or may.sirinopwongsagon@lacity.org.

RESPONSE TO COMMENTS

WEINGART PROJECTS SCEA

This document provides written responses to all of the written comment letters submitted to the City of Los Angeles (City) during the 30-day public review period for the Sustainable Communities Environmental Assessment (SCEA) prepared for the proposed Weingart Project (Project). All comment letters are included as Attachment A. All individual comments have been delineated, numbered, and included, below. Responses to individual comments have also been provided.

AGENCY COMMENTS

Metro Comment Letter

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

Metro Comment 1

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Weingart Projects (Project) located at 554-562 South San Pedro Street, 555-561 South Cocker Street (Site 1); 600-628 South San Pedro Street, 611-615 South Cocker Street, 518-552 East 5th Street (Site 2) in the City of Los Angeles (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

The purpose of this letter is to briefly describe the proposed Project, based on the Notice of Completion and Sustainable Communities Environmental Assessment, and to outline recommendations from Metro concerning issues that are germane to our agency's statutory responsibility in relation to the Metro bus facilities and services, which may be affected by the proposed Project.

Project Description

The proposed Project includes the development of two distinct affordable housing projects for permanent long-term housing with supportive services designed to enable homeless persons and individuals/ families at risk of homelessness on Site 1 and Site 2, respectively. Site 1 will include the demolition and removal of an existing structure, surface parking area, and the construction of 378 Very-Low Income household Units along with 2,250 square feet of commercial floor area. Site 2 includes the demolition and removal of an existing surface parking lot and the development of a mixed-use residential building with 303 residential units, 3,200 square feet of commercial uses, and 17,100 square feet of office use.

Response to Metro Comment 1

This comment summarizes a portion of the Project Description. The commenter is referred to Section 2 (Project Description) of the SCEA for a complete description of the Project. Regarding Metro's recommendations outlined in the comment letter, the commenter is referred to Response to Metro Comment 2 through Response to Metro Comment 9.

Metro Comment 2**Metro Comments**

In addition to the specific items outlined below, Metro would like to provide the Project Sponsor with a user-friendly resource, the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW), as well as the Adjacent Construction Manual with technical information (also attached). These documents and additional resources are available at www.metro.net/projects/devreview/.

Response to Metro Comment 2

Regarding the specific items identified in Metro Comment 2 as "outlined below," the commenter is referred to Response to Metro Comment 3 through Response to Metro Comment 9.

The MTA Design Criteria provided by Metro has been incorporated into the record and forwarded to the Project Applicant for their consideration.

Metro Comment 3***Metro Bus Stop Adjacency***

1. Service: Metro Bus Lines 18, 53, 62, and 720 operate on East 6th Street, adjacent to the proposed Project. A Metro bus stop on East 6th Street is directly adjacent to the proposed Project. Other transit operators may provide service in this area and should be consulted.

Response to Metro Comment 3

This comment identifies Metro transit lines that operate adjacent to the Project Sites and the Metro bus stop on East 6th Street near the Project Sites. However, this comment does not state a specific concern or question regarding the sufficiency of the SCEA in identifying and analyzing the environmental impacts of the Project and ways to reduce or avoid these impacts. No further response is required.

All transit operators in the vicinity of the Project Sites would be consulted as necessary or required.

Metro Comment 4

2. Impact Analysis: With an anticipated increase in traffic during and after construction, Metro encourages any impact analysis to include potential effects on the Metro Bus line(s). Potential impacts could include construction traffic, operation of and shipment/deliveries to the completed Project, and temporary or permanent bus service rerouting.

Response to Metro Comment 4

As discussed in detail on pages 6-249 through 6-256 in Section 6: Sustainable Communities Environmental Analysis of the SCEA, peak construction trip generation during the AM peak hour would occur during the grading/excavation phases associated with Site 2, overlapping with operational traffic associated with Site 1. The conservative peak-hour trip estimate for this scenario is approximately 180 trips (i.e., 97 inbound and 83 outbound trips). During the PM peak, peak construction trip generation would occur during the building construction phase associated with Site 2, overlapping with operational traffic associated with Site 1. The conservative peak-hour trip estimate for this scenario is approximately 131 trips (i.e., 47 inbound and 84 outbound trips).

As shown on Table 6-67 on page 6-219, during operation of the Project at full buildout, the Project would generate an estimated net total of 2,038 daily trips, including 229 AM peak-hour trips and 197 PM peak-hour trips. Based on the City threshold of significance for intersection level of service (refer to Table 6-66 on page 6-216), the Project's operational traffic would not result in any significant traffic impacts (refer to Table 6-65 on page 6-215). Shipments and deliveries to the Project Sites would not occur on streets or public rights of way near the sites but would occur at designated interior delivery areas within the proposed buildings.

As indicated on pages 6-249 through 6-256 of the SCEA, given that buildout of the Project would generate approximately 229 net new vehicle trips during the weekday AM peak hour and 197 net new vehicle trips during the weekday PM peak hour, no significant traffic impacts are expected, and it can also be concluded based on a comparative review of trip generation that no significant traffic impacts are anticipated to occur during the Project's construction phase.

For these reasons, the Project's traffic generation would not significantly affect the level of service of the roadways in the vicinity of the Project Sites and would not significantly affect the ability of Metro buses to continue to provide service.

During the Project's construction phase, no bus routes would need to be rerouted, since construction of the Project is not anticipated to require blockage of any roadways with bus routes. However, temporary relocation of a bus stop may be necessary. There is one bus stop located adjacent to the Project Sites that is located along the south side of East 6th Street, east of South San Pedro Street, along the northerly Site 2 frontage. This stop serves Metro transit routes 18, 53, 62, and 720. A transit bench is already provided at this location. It is possible that this bus stop could require temporary relocation during a portion of the construction phase for Site 2. Such temporary relocation of bus stops during construction is common practice in the City and requires approval by Metro and other service providers (as applicable).

Temporary relocation of the existing bus stop from a far-side location (i.e., on eastbound East 6th Street, east of South San Pedro Street in this instance) to a near-side location (i.e., west of South San Pedro Street) during the duration of Site 2 construction activities - an approximately 19 to 20 month duration - is not expected to result in any significant traffic impact. As shown on Table 6-65 on page 6-215 of the SCEA, the intersection of East 6th Street at South San Pedro Street is forecast to operate at level of service A during both the weekday AM and PM peak hours in all existing and future year 2025 conditions. In addition, these existing transit bus trips are already included in the baseline traffic counts and corresponding analyses. While some intermittent stoppages in the eastbound, exterior through travel lane may occur during bus patron boardings and alightings, the intersection operations would not be degraded to a point that would constitute a change in level of service. Although temporary bus stop relocation further east of the existing bus stop is unlikely, those potential impacts would be the same as/similar to the current bus stop, as motorists traveling in the eastbound, exterior through travel lane presently experience similar intermittent delays during bus patron boardings and alightings.

The SCEA incorporates a mitigation measure, TRAFFIC-MM-1, to require a Construction Staging and Traffic Management Plan to be prepared in coordination with LADOT to reduce impacts to a less than significant level. As discussed in the Errata dated October 22, 2018 for the SCEA, the mitigation measure has been revised to provide additional clarity as it relates to the elements of the Construction Staging and Traffic Management Plan. The Errata clarifies that prior to the start of the construction phase for Site, the Project Applicant would be required to coordinate with Metro regarding temporary relocation of the bus stop adjacent to Site 2. However, for purposes of clarification, Mitigation Measure TRAFFIC-MM-1 listed on page 6-260 has been revised as follows (revisions show in underline):

TRAFFIC-MM-1: Construction Staging and Traffic Management Plan

Prior to issuance of a demolition permit, in coordination with LADOT and the Department of Building and Safety, the Project Applicant shall prepare a detailed Construction Staging and Traffic Management Plan (CSTMP), including street closure information, detour plans, haul routes, and staging plans. The CSTMP shall outline how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The CSTMP shall be based on the nature and timing of specific construction activities and other projects in the vicinity, and shall include the following elements as appropriate:

- Coordinate with Metro regarding temporary relocation of the bus stop located on East 6th Street adjacent to Site 2 and other construction activities that could affect Metro service in the vicinity of the Project Sites;
- Provide for temporary traffic control during all construction activities within public rights-of-way to improve traffic flow on public roadways (e.g., flagmen);
- Schedule of construction activities to reduce the effect on traffic flow on surrounding arterial streets;
- Reroute construction trucks to reduce travel on congested streets to the extent feasible;

- Prohibit construction-related vehicles from parking on surrounding public streets;
- Provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers in compliance with LAMC Section 62.45;
- Accommodate all equipment on-site; and
- Prepare a haul truck route program for the Project that specifies the routes to and from the Project Sites.

The revision to Mitigation Measure TRAFFIC-MM-1 does not constitute significant new information as defined in CEQA Guidelines subsection 15088.5, because the revision simply clarifies an existing requirement and does not present a new or increased significant impact not already identified in the SCEA.

Metro Comment 5

3. Driveways: Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit. One driveway, located on the southeast corner of 6th Street, is between the Metro Bus stop and the beginning of the curve. The driveway is currently inactive and has a chain-link fence blocking its use. Metro recommends the permanent removal of the inactive driveway in order to avoid future potential conflicts with on-street transit services and pedestrian traffic.

Response to Metro Comment 5

As noted in Response to Metro Comment 4, the only bus stop located adjacent to the Project Sites is located along the south side of East 6th Street, east of San Pedro Street, along the northerly Site 2 frontage. This stop serves Metro transit routes 18, 53, 62, and 720. A transit bench is already provided at this location. For further discussion of the potential impacts of temporary relocation of the bus stop adjacent to Site 2, the commenter is referred to Response to Metro Comment 4.

The commenter is correct in that there is an existing driveway apron at Site 2 that is not operational, as it has been closed via a chain link fence surrounding the existing parking lot. This driveway will be removed in the future as part of the construction of Site 2 and new curb and gutter will be installed in its place. Access for Site 2 will be provided in the future via a single driveway on South San Pedro Street, and the driveway will not interfere with any bus transit stops, as driveways are proposed along east side of South San Pedro Street along the Site 2 frontage. At Site 1, no bus stops are provided along the Project Site frontages. Access to Site 1 will only be provided via a single driveway on South Crocker Street. For these reasons, the Project's driveways would not result in vehicle, transit, or pedestrian conflicts.

Metro Comment 6

4. Bus Stop Access & Enhancements: Metro encourages the installation of bus shelters with benches, wayfinding signage, enhanced crosswalks and ramps compliant with the Americans with Disabilities Act (ADA), as well as pedestrian lighting and shade trees in paths of travel to access bus stops and other amenities that improve safety and comfort for transit riders. The City should consider requesting the installation of such amenities as part of the development of the site.

Response to Metro Comment 6

This comment encourages the City to consider requesting the Project Applicant to install bus stop access and enhancement amenities. However, this comment does not state a specific concern or question regarding the sufficiency of the SCEA in identifying and analyzing the environmental impacts of the Project and ways to reduce or avoid these impacts. Nonetheless, the comment is acknowledged and included in the record for review and consideration.

Metro Comment 7

5. Final Bus Stop Condition: The existing Metro bus stop must be maintained as part of the final Project. During construction, the stop must be maintained or relocated consistent with the needs of Metro Bus operations. Final design of the bus stop and surrounding sidewalk area must be ADA-compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.

Response to Metro Comment 7

The existing Metro bus stop located adjacent to Site 2 on East 6th Street will be maintained as part of the final Project. As discussed in Response to Metro Comment 4, the Project Applicant would be required to coordinate with Metro regarding temporary relocation of the bus stop. The Project Applicant would be required to comply with all ADA requirements.

Metro Comment 8

6. Bus Operations Contacts: Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 with any questions and at least 30 days in advance of initiating construction activities. Other municipal buses may also be impacted and should be included in construction outreach efforts.

Response to Metro Comment 8

As noted in other responses to Metro comments, the Project Applicant will coordinate with Metro prior to the start of any construction activities.

Metro Comment 9***Active Transportation***

Metro encourages the City to work with the Project Sponsor to promote bicycle use through adequate short-term bicycle parking, such as ground-level bicycle racks, as well as access-controlled, enclosed long-term bicycle parking, for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including: highly visible siting, effective surveillance, easy to locate, and equipment installed with preferred spacing dimensions, so they can be conveniently accessed. The Project Sponsor should coordinate with the Metro Bike Share Program for a potential Bike Share station at this development, if applicable. Additionally, the Project Sponsor should help facilitate safe and convenient connections for pedestrians, people riding bikes, and transit users to/from the Project site and nearby destinations.

If you have any questions regarding this response, please contact Eddi Zepeda by phone at 213-418-3484, by email at DevReview@metro.net, or by mail at the following address:

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

Response to Metro Comment 9

As discussed in Section 2: Project Description of the SCEA, in accordance with the updated Bicycle Parking Ordinance (Ordinance 185,480), the Site 1 Project would be required to provide 229 long-term and 29 short-term bicycle parking spaces for a total of 258 spaces (refer to Table 2-4 on page 2-67). The Site 1 Project would meet the short-term bicycle parking requirements and would exceed the long-term bicycle parking requirements by 25 spaces. The Site 2 Project would be required to provide 157 long-term and 20 short-term bicycle parking spaces for a total of 177 spaces (refer to Table 2-7 on page 2-93). The Site 2 Project would meet the short-term bicycle parking requirements and would exceed the long-term bicycle parking requirements by 33 spaces. All bicycle facilities (such as bicycle repair facilities) included as part of the Project would be designed and constructed to meet the requirements of the Los Angeles Municipal Code (LAMC) Section 12.21.4. At this time, the Project Applicant has not proposed to participate in the Metro Bike Share Program.

COMMUNITY COMMENTS

Burke Comment Letter

Stephanie Burke Wagner
sburke@burkeinvestments.com

Burke Comment 1

I am writing in response to the notice I received regarding Weingart's proposed Site 1 and Site 2 projects, referenced above. I am an owner of an industrial building abutting the proposed site 1 location and have not had the opportunity to speak with Weingart regarding this nor seen any of their environmental reports.

I would like to ask for an extension of today's deadline for public comments, which would allow time to review/discuss the proposed project that is adjacent to my building with my neighbor, the applicant.

Response to Burke Comment 1

The City is unable to extend the legally required 30-day public comment period for the SCEA. However, the public record for the Project will remain open until the City Council has made a determination to adopt the SCEA. Public comments can be submitted to the City Planning Department or the City Clerk via the Council File Number 18-0889 for consideration as part of the public record.

Regarding the Project Applicant's community outreach efforts, the commenter is referred to Response to Lopez Comment 4, below.

Huie Comment Letter

Judy Huie
4977 Santa Anita Ave
Temple City, CA 91780

Huie Comment 1

URGENT!!

I own and manage properties on 6th, Crocker and Towne Ave. This project is directly across from me.

I was informed TODAY of the Weingart Project. Unfortunately I am unable to attend the meeting scheduled for Friday, October 19th and ask that you extend the deadline for public comments. I would like to speak with the Weingart representative to better understand this project and how they plan to mitigate the impact of this type of development.

This is my email and my mailing address is 4977 Santa Anita Ave, Temple City, CA 91780.

Please add me to the mailing list for the Weingart Project.

Response to Huie Comment 1

The City is unable to extend the legally required 30-day public comment period for the SCEA. However, the public record for the Project will remain open until the City Council has made a determination to adopt the SCEA. Public comments can be submitted to the City Planning Department or the City Clerk via the Council File Number 18-0889 for consideration as part of the public record.

Regarding the meeting on October 19, 2018, this is a meeting set up by the Project Applicant as part of continued community outreach; the meeting is not a City meeting or hearing.

The commenter has been added to the Interested Parties list for the Project.

Regarding the Project Applicant's community outreach efforts, the commenter is referred to Response to Lopez Comment 4, below. The commenter does not provide an exact location/address for receipt of notices for the Project. However, all interested parties and property owners and occupants within a 500-foot radius have been provided all of the City- and CEQA-required public notices regarding the SCEA process for the Project.

Lopez Comment Letter

Estela Lopez
Downtown LA Industrial District BID
725 Crocker Street
Los Angeles, CA 90021

Lopez Comment 1 (E-Mail dated October 12, 2018)

Dear May, please see the attached letter requesting an extension of the SCEA comment period. Thank You.

Response to Lopez Comment 1

The City is unable to extend the legally required 30-day public comment period for the SCEA. However, the public record for the Project will remain open until the City Council has made a determination to adopt the SCEA. Public comments can be submitted to the City Planning Department or the City Clerk via the Council File Number 18-0889 for consideration as part of the public record. The commenter is referred to Response to Lopez Comment 3 through 7, below, regarding the attached letter referenced in the E-Mail.

Lopez Comment 2 (E-Mail dated October 15, 2018)

Thanks. As promised, I am organizing a meeting for the project's immediate neighbors to meet with the applicant and their consultants. There are language barriers with some neighbors, others received the notice but didn't understand the scope of the project. In any event, the applicant failed in their due diligence to ensure their neighbors were aware. In other neighborhoods, no developer would even think of building three towers without having held numerous conversations with their neighbors. So I am doing this work for them. I will advise anyone who wishes to comment to do so to you, the Clerk and the Council office. Also the Planning Commission, right?

Response to Lopez Comment 2

Regarding the Project Applicant's community outreach efforts, the commenter is referred to Response to Lopez Comment 4, below.

Public comments can be submitted to the City Planning Department, the City Clerk, and Planning Commission via the Council File Number 18-0889 for consideration as part of the public record and at any public hearing for the Project.

The following comments are from the attached letter dated October 12, 2018 from the Central City East Association.

Lopez Comment 3

The above-referenced proposed project is within the boundaries of the LA Downtown Industrial Business Improvement District, which is administered by the Central City East Association (CCEA). We respectfully request an extension to the public comment period for this project, which currently ends on Monday, October 15, 2018.

Response to Lopez Comment 3

The commenter is referred to Response to Lopez Comment 1.

Lopez Comment 4

The applicant has not been in recent contact with the project's surrounding neighbors. There were two meetings, one on April 7, 2015 before any project application was filed, and a second meeting on June 14, 2017. There've been no direct meetings with adjoining businesses since that time. Goods movement is vital to these industrial businesses and if this project is approved, it will not have benefited from the important feedback from those most impacted. This feedback would inform the applicant's mitigation measures affecting haul routes, street circulation, and other similar construction impacts. Many of the industrial businesses in this zone are part of the regional frozen food distribution network that relies on accurately timed deliveries and shipments. A business immediately adjacent to the project's Site 1 is a commercial kitchen that fulfills orders throughout the day.

Response to Lopez Comment 4

The Project Applicant has conducted extensive public outreach to provide information and to solicit feedback/suggestions regarding the Project to surrounding neighbors and other interested parties, as noted in the Project Applicant's presentation at the Advisory Agency Hearing held on October 10, 2018. Additionally, all interested parties and property owners and occupants within a 500-foot radius have been provided all of the City- and CEQA-required public notices regarding the SCEA process for the Project.

Regarding the Project's haul route, City approval of a haul route is required for projects that include a Tentative Map, which requires for its implementation the import and/or export of more than 1,000 cubic yards of earth materials, pursuant to LAMC Section 17.13. The commenter is referred to page 2-99 in Section 2 (Project Description) of the SCEA and minor revisions made to the Project's haul route in the Weingart Projects SCEA Errata (located in the Project File at the Department of City Planning) that identify the Project's haul routes to be followed by trucks hauling earth materials. The following text regarding the Project's haul routes as described in the SCEA and in the associated Errata is presented for the commenter's convenience:

The facility(ies) to receive the Project's export materials that would be generated during the Project's construction phase has not been identified at this time. However, several facilities are located within a 50-mile radius of the Project Site, including, but not limited to: Active Recycling MRF and Transfer Station, American Reclamation CDI Processing Facility, Downtown Diversion, and Manning Pit. The Project's haul route would be required to be approved by the City. Project haul trucks would use the most direct route to transport demolition and construction debris from the Project Sites to a designated recycling facility and/or landfill. Regional access to recycling facilities and/or landfills is available to the Project Sites via State Route 110/I-110 Freeway, located approximately 1.0 mile to the west; I-10 Freeway, located approximately 1.5 miles to the south; and State Route 110/I-10 Freeway located approximately 1.0 mile to the east. Direct local access to these freeways and the anticipated local haul route(s) from the Project Sites would consist of eastbound East 6th Street, northbound Crocker Street, westbound 5th Street to State Route 110/I-110 Freeway, and/or East 6th Street, southbound Crocker Street, westbound 7th Street, southbound South San Pedro Street to the I-10 Freeway.

Additionally, the City would require the Project Applicant to limit truck weight, length, and/or speed and other conditions of approval as may be necessary to ensure repair of damages to public streets along the hauling route that may reasonably be expected to be caused by hauling operations. The Project Applicant will be required to comply with these conditions.

Regarding "street circulation" and "other similar construction impacts," as shown on Table 6-67 on page 6-219 in Section 6 (Sustainable Communities Environmental Analysis) of the SCEA, during operation of the Project at full buildout, the Project would generate an estimated net total of 2,038 daily trips, including 229 AM peak-hour trips and 197 PM peak-hour trips. Based on the City threshold of significance for intersection level of service (refer to Table 6-66 on page 6-216), the Project's operational

traffic would not result in any significant traffic impacts (refer to Table 6-65 on page 6-215). The Project's operational traffic generation would not impede the flow of goods within the Project Sites' area.

Further, as discussed in detail on pages 6-249 through 6-256 of the SCEA, peak construction trip generation during the AM peak hour would occur during the grading/excavation phases associated with Site 2, overlapping with operational traffic associated with Site 1. The conservative peak-hour trip estimate for this scenario is approximately 180 trips (i.e., 97 inbound and 83 outbound trips). During the PM peak, peak construction trip generation would occur during the building construction phase associated with Site 2, overlapping with operational traffic associated with Site 1. The conservative peak-hour trip estimate for this scenario is approximately 131 trips (i.e., 47 inbound and 84 outbound trips). Thus, given that buildout of the Project would generate approximately 229 net new vehicle trips during the weekday AM peak hour and 197 net new vehicle trips during weekday PM peak hour, no significant traffic impacts are expected, and it can also be concluded based on a comparative review of trip generation that no significant traffic impacts are anticipated to occur during the Project's construction phase. The Project would not block or impede access to or from any properties in the Project Sites' area during the construction phase. Thus, the Project's construction traffic generation would not impede the flow of goods within the Project Sites' area.

Lopez Comment 5

Additionally, the applicant's representative stated in their presentation on October 10, 2018 that this project lies outside of the required zones for pedestrian lighting and there was no mention of what, if any, additional pedestrian lighting the project will offer. Tragically, this community has the highest number of unsheltered individuals in the nation. Approximately 2,000 persons live on the sidewalks in Skid Row. One of the reasons they are so often victims of violence is that these streets are dark. As a century-old industrial area, Central City East has only utilitarian lighting. It does not have the same requirements for pedestrian lighting as do other communities. A project such as this could contribute in an important way to improving the safety of the public realm. We would like to have further conversations with the applicant on the issue of pedestrian lighting.

Response to Lopez Comment 5

The commenter should note that at the Advisory Agency Hearing on October 10, 2018, the Project Applicant's representative did not state that the Project "lies outside of the required zones for pedestrian lighting." The representative stated that the Project Sites are located outside of the boundaries of the implementation area of the Downtown Design Guidelines, which was referred to by the representative of the Bureau of Street Lighting. The Project is subject to all lighting requirements of the LAMC, including safety lighting requirements. To the extent that the commenter refers to requirements of the Downtown Design Guidelines, the commenter should note that pedestrian lighting in the Downtown Design Guidelines are defined as, "ornamental and do not contribute to the required illumination level, but they may supplement it." The Downtown Design Guidelines also states, "Pedestrian lights contribute to the pedestrian scale of the street and add a warm glow of yellow light on the sidewalk." The pedestrian

lighting requirements specified in the Downtown Design Guidelines are for aesthetics purposes and not specifically for safety.

Lopez Comment 6

As the organization that administers the Business Improvement District in this area, we are offering to coordinate a meeting quickly for the applicant to meet with their industrial neighbors. We are already in discussion with the applicant regarding this, and we believe this will be accomplished in the very near future.

Response to Lopez Comment 6

The commenter is referred to Response to Lopez Comment 4 and Response to Huie Comment 1.

Lopez Comment 7

For this reason, we are submitting our request for a modest extension of the public comment period. Thank you for your consideration, and please feel free to contact me if you have any questions.

Response to Lopez Comment 7

The commenter is referred to Response to Lopez Comment 1.

Note: In addition the written comments submitted to the Department of City Planning by Ms. Lopez, Ms. Lopez also provided verbal comments at the Advisory Agency Hearing on October 10, 2018 regarding the Project. The comments provided at the hearing are similar to those provided in her written comments (provided above), to which responses have been provided.

Woo Comment Letter

Charles Woo
630 S San Pedro Street
Los Angeles, CA 90014

Woo Comment 1

I. INTRODUCTION

We are the owners of the building located at 630-634 South San Pedro Street (the "ABC Toys Building") in the City of Los Angeles ("City"), we appreciate this opportunity to submit comments on the Sustainable Communities Environmental Assessment ("SCEA") prepared by the City in connection with the proposed Weingart Projects ("Project") and being considered under Case No. ENV-2017-615-SCEA. While we recognize and believe in the importance and significance of the Project, and support all City-wide efforts to address the need for more affordable and supportive housing, we must take this moment to

underscore the potential for impacts to the ABC Toys Building, located immediately adjacent to the Project, stemming from what is proposed as the area's first-ever high-rise towers for supportive housing.

Response to Woo Comment 1

Regarding potential impacts to the ABC Toys Building, the commenter is referred to Response to Woo Comment 2 through Response to Woo Comment 8.

Woo Comment 2

While, to date, we have avoided involving legal counsel, we did so with the hope for greater outreach to us and other stakeholders. Unfortunately, we have still received extremely limited information and been given almost no time to review and comment meaningfully on the SCEA. This was a point raised at the Project's public hearing on October 10, 2018, in response to which the Project applicant's representative agreed to schedule a meeting with community stakeholders to discuss the project in greater detail and explain potential impacts. The meeting is currently set to occur this Friday, October 19, 2018 at 1:30 p.m. at which we expect highly relevant information to be disclosed with respect to the Project and its potential impacts to surrounding properties. In this regard, to allow for meaningful public comment on the SCEA, we respectfully request the City, as the lead agency, extend the end of the public comment period from October 15, 2018 to a date no earlier than 10 days after the meeting with stakeholders occurs.

Response to Woo Comment 2

Regarding the Project Applicant's community outreach, the commenter is referred to Response to Lopez Comment 4.

Regarding the meeting on October 19, 2018, this is a meeting set up by the Project Applicant as part of continued community outreach; the meeting is not a City meeting or hearing.

Woo Comment 3

II. COMMENTS REGARDING ANALYSIS OF POTENTIAL PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

California Public Resources Code Section 21155.2 offers certain benefits under the California Environmental Quality Act ("CEQA") review through streamlining for projects of both local and regional benefits-nevertheless the review must still adhere address and review the Project's impacts. As described below, it is unclear whether the City has fully addressed or analyzed all potential impacts required under SB 375; important data has not been disclosed to the public; and it is unclear whether significant impacts appear not to be fully mitigated.

Response to Woo Comment 3

This comment does not state a specific concern or question regarding the sufficiency of the SCEA in identifying and analyzing the environmental impacts of the Project and ways to reduce or avoid these impacts. No further response is required.

Woo Comment 4**a. Land use consistency**

The Project site is currently zoned M2-2D-a zoning designation that restricts uses light industrial uses and prohibits residential uses. The Project site is further designated by the General Plan s Light Manufacturing. The current zoning caps density at zero by prohibiting residential units and limits the maximum allowable Floor Area Ratio ("FAR") to 3:1. Such zoning is consistent with nearly all surrounding properties, except for the cluster R5 properties located west of San Pedro Street as shown below.

Among the entitlements requested for the Project (under CPC-2017-589-GPAJ-VZCJ-HD-SPR) are a Zone Change from M2-2D to C2-4D and General Plan Amendment from Light Manufacturing to Regional Commercial. If approved, the proposed Project would become the only property in the area with such zoning and would allow for unlimited density and an FAR of over 8:1. This would allow the Project to be built to 19 stories in height, incorporate 685 dwelling units, approximately 25,000 square feet of supportive service office area, and a total occupancy of 1,420 persons. As stated by City staff at the October 10th hearing for CPC-2017-589-GPAJ-VZCJ-HD-SPR, if approved, the Zone Change and General Plan Amendment could be considered "spot-zoning."

Response to Woo Comment 4

The commenter identifies a remark made by City staff at the joint public hearing conducted by the Advisory Agency and Hearing Officer on October 10, 2018, and claims that this remark represents evidence that the Project's zone change and general plan amendment could be considered "spot zoning." The comment regarding "spot zoning" made at the joint public hearing was made by the representative of the Bureau of Engineering as it related to the application of the appropriate Street Standard for the Collector Street designation of Crocker Street. As identified in the S-470-1 (Standard Street Dimensions), there are two street standards for Collector Streets, the Collector Street Standard is applied to roadways which abut residentially or commercially zoned properties and the Industrial Collector Street Standard which is applied to roadways which abut industrially zoned properties. The comment was made as it refer to applying the appropriate street standard and not as it relates to the City's position regarding the appropriateness of the requested amendment and zone change. As announced by the Hearing Officer for incidental Case No. CPC-2017-614-GPAJ-ZCJ-HD-SPR, no determination was being made by the City as it relates to the requested amendment and zone change at the joint public hearing. The requested amendment and zone change will be presented for consideration by the City Planning Commission at a future date, tentatively scheduled for November 29, 2018. Therefore, the representative's comments

should not be construed to represent an opinion by the City that the Project approvals would constitute spot zoning.

The comment notes the Project Sites' existing land use and zoning designations as well as the consistency of these designations with those of the surrounding properties and suggests that the requested General Plan and zone change are inconsistent with the neighboring uses and designations. The commenter should note that according to the Governor's Office of Planning and Research General Plan Guidelines (2003), "An action, program or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment."¹ As stated by the Court of Appeal in *Save Our Peninsula Comm. V County of Monterey (2001) 87 Cal. App. 4th 99,142*, "[b]ecause policies in a general plan reflect a range of competing interests, the governmental agency must be allowed to weigh and balance the plan's policies when applying them, and it has broad discretion to construe its policies in light of the plan's purposes." As outlined on page 2-8 in Section 2: Project Description of the SCEA, the properties surrounding the Project Sites are used for similar uses such as affordable housing, focused on formerly homeless individuals, with comprehensive services and commercial uses. The commenter is referred to pages 6-135 through 6-157 in Section 6 (Sustainable Communities Environmental Analysis) of the SCEA that provide a detailed analysis of the consistency of the Project to the City's General Plan and the requested zone. As discussed in the SCEA, the Project is consistent with the SCAG 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS). The SCEA identifies and incorporates mitigation measure MM-LU-1(b) to address any potential inconsistencies between the 2016-2040 RTP/SCP and the adopted general plan land use designation and zoning for the Project Sites.

Woo Comment 5

b. Actual Population Growth

The SCEA's analysis relative to the potential impacts surrounding the significant increase in density proposed as part of the Project appears to rely on unsubstantiated assumptions and does not take into account the vulnerability of the select population of the Project.

As stated in the SCEA:

The Project includes the development of up to 685 new residential dwelling units, including approximately 451 permanent supportive units, up to 225 affordable housing units, and 9 manager units, and up to a maximum of 5,450 square feet of retail, 25,493 square feet of philanthropic, and 17,100 square feet of office uses. The maximum residential occupancy for the Project would be 1,420, limited by requirements set forth in the regulatory agreement between the Project Applicant and the HCIDLA. Approximately 95 percent of the future residents of the 451 permanent supportive units would be previously homeless people from within the City. Assuming approximately 2.07 persons-per-unit rate,

¹ Governor's Office of Planning and Research, *General Plan Guidelines (2003) page 164*.

approximately 887 of the Project's future residents already reside in the City. It is likely that the remaining 533 future residents already live in the City, as well, as discussed in more detail below. However, for purposes of a conservative analysis, it is assumed that the Project could add 533 new residents to the City. In addition, according to the Project Applicant the Project would generate approximately 74 employees.

The assumption that 95 percent of future residents in the Project's permanent supportive units would be previously homeless people from within the City raises questions given that the Project utilizes the Coordinated Entry and Homeless Management Information System ("CES") to select applicants for its permanent supportive housing units. As we understand, CES is a regional and county-wide process developed to ensure that all people experiencing homelessness have fair and equal access to housing and assistance based on their needs and strengths. In this way, we believe, CES matches up homeless individuals to housing based on a score which assesses their greatest need for a particular type of housing, not based on geographic location.

Because CES places individuals from across the County into housing, we would like more information on how the Project applicant will ensure that 95 percent of future residents in the Project's permanent supportive units would be comprised of previously homeless people from within the City. At present, the Project creates the impression that it could create a potentially significant impact by inducing substantial and overly concentrated growth of a vulnerable population in an already highly impacted area.

Response to Woo Comment 5

While CES does assess homeless individuals based on their need, homeless individuals are referred to housing based both on need and geographic location. Specifically, CES refers homeless individuals within a Service Planning Area (SPA) to available housing options in the same SPA. The Project Sites are located within SPA-4, which comprises Metro LA and serves the communities of Boyle Heights, Central City, Downtown LA, Echo Park, El Sereno, Hollywood, Mid-City Wilshire, Monterey Hills, Mount Washington, Silver Lake, and Westlake, all located within the City of Los Angeles and the City of West Hollywood. SPA-4 comprises only a portion of the service planning areas within the City.²

As part of a regular course of operation, the Weingart Center, together with The People Concern, which is the CES lead organization for SPA-4 has documented that it will adhere to the following policies and procedures, already in place within CES:³

- Referrals for applicants for tenancy come from SPA-4.

² County of Los Angeles Public Health, Service Planning Area 4, <http://publichealth.lacounty.gov/chs/SPA4/>, accessed on October 19, 2018.

³ Refer to correspondence provided by Hazel Lopez, the Director of CES and Community Engagement of The People Concern, dated October 19, 2018, included as Attachment B.

- All SPA-4 referrals must be exhausted prior to considering people from other SPAs. There are approximately 14,000 homeless individuals in SPA-4 according to the most recent homeless count.
- The People Concern (i.e., the lead for SPA-4) conducts street outreach to people who are homeless in the immediate area and to shelters and transitional housing facilities in the immediate area, to engage them in the CES and in the housing application process.
- The Weingart Center will conduct its own neighborhood-focused marketing and outreach efforts in coordination with The People Concern and the CES, including street outreach, to engage people who are homeless in the immediate area in the housing application process.

With implementation of these policies, and given the large number of homeless individuals within SPA-4, it is anticipated that the permanent supportive housing units within the Project will be occupied by individuals and families within SPA-4.

Finally, the commenter implies that the Project could “create a potentially significant impact by inducing substantial and over concentrated growth of a vulnerable population in an already highly impacted area.” However, the commenter does not provide facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of this implication. As such, pursuant to §15204(a) of the CEQA Guidelines, no further response to this comment is required. Also, the commenter should note that one of the main factors that make people experiencing homelessness “vulnerable” is that they are homeless. By providing people who are homeless with a stable, quality, affordable home, their “vulnerability” is significantly decreased.

Woo Comment 6

c. Public Services

The SCEA arrives at the conclusion that the Project would have a "Less Than Significant Impact" on the maintenance of acceptable service ratios, response times or other performance objectives for fire protection, schools, parks and other public facilities and purports to mitigate any potential impacts with respect to police services.

We do not object to the provision of housing for the mentally ill and/or those suffering from addiction. In fact, it should be encouraged. However, the City must ensure that this particular Project provide additional analysis of the issue of managing a population of supportive service tenants in this particular area given its particularly limited public service availability.

Response to Woo Comment 6

The SCEA includes a detailed analysis of Project impacts related to public services. The commenter is referred to pages 6-184 through 6-198 in Section 6: Sustainable Communities Environmental Analysis.

Regarding Project impacts related to fire protection services, as discussed in the SCEA, the Project would meet all fire flow, response distance, and emergency access requirements and would not require the need for new or altered fire protection facilities. Therefore, Project impacts related to fire protection services would be less than significant.

Regarding Project impacts related to police protection services, the Project would include defensible spaces designed to reduce opportunity crimes and ensure safety and security. In addition, the lighting and landscaping design would ensure high visibility and the Project would provide for on-site security measures and controlled access systems for residents and tenants to minimize the demand for police protection services. The Project would incorporate crime prevention features into the design of the buildings and public spaces, such as lighting of entryways and public areas. Additionally, the Project Applicant would be required to comply with Mitigation Measure POLICE-MM-1, which is provided as follows:

POLICE-MM-1: Prior to issuance of a Certificate of Occupancy, the Project Applicant shall provide the Central Area Commanding Area Officer with diagrams of each portion of the Project Sites. The diagrams shall include access routes and additional information that might facilitate police response.

Additionally, the Project would also contribute to the General Fund, a portion of which is allocated to the LAPD and other public services. Therefore, with mitigation and regulatory compliance, Project impacts related to police protection services would be less than significant.

Regarding Project impacts related to schools, pursuant to the California Government Code Section 65995, the Project's required payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Therefore, Project impacts to school services would be less than significant.

Regarding Project impacts related to parks and recreational facilities, the Project includes approximately 59,060 square feet of open space, including courtyards, recreational rooms, and open decks to serve the residents and visitors of the Project. The Project would meet LAMC open space requirements with the requested entitlements, which are consistent with the Greater Downtown Housing Incentives, and would be required to pay applicable park fees. Through compliance with the LAMC, Project impacts related to parks and recreational facilities would be less than significant.

Regarding Project impacts related to library services, several libraries are located within the area of the Project Sites. Additionally, the Project would provide on-site computers, Internet access, and on-site library facilities, including an art and music library space, reference books, and other books for loan to Project residents. It is anticipated that most, if not all, of the demand for library services created by the Project would be accommodated by the Project. For these reasons, the Project would not create the need for new or expanded library facilities. Therefore, Project impacts related to library services would be less than significant.

Additionally, the Project would provide a variety of services (listed below) to its residents that would be managed by experienced professionals associated with the Weingart Center and The People Concern.

- Mental health care
- Medical and dental care
- Employment services
- Job training
- Job placement
- Educational services
- Legal services
- Life skills
- Other services as needed by individual residents

It should be noted that providing stable housing, services, and managed structure to a population of homeless people, who currently live on the streets with no structured management, would likely result in a decrease in the need for public services in the vicinity of the Project Sites.

Woo Comment 7

d. Traffic and Queuing

As described at the hearing, the Project proposes approximately 25,000 square feet of floor area to be open to and utilized by the public for various services. We do not understand how the obvious potential for persons accessing these services to queue outside of the Property along the sidewalk will not directly impact the ABC Toys Building and other nearby businesses.

Response to Woo Comment 7

The development at Site 1 would not include any public services. All services provided at Site 1 would be provided primarily by appointment. Any potential pedestrian queuing would occur within the proposed buildings and/or courtyard on Site 1. Public services could be provided on Site 2 as part of the 25,000 square feet designated for public services. However as with the Site 1 development, services would occur primarily by appointment, and any potential pedestrian queuing would occur within the proposed building and/or courtyard on Site 2. The Project would not result in any queuing outside of the boundaries of the Project Sites.

Woo Comment 8

For the foregoing reasons, we respectfully ask that the City, both consider the above initial comments to the SCEA and extend the public comment period from October 15, 2018 to a date no earlier than 10 days after the Project applicant's meeting with stakeholders occurs.

Response to Woo Comment 8

The City is unable to extend the legally required 30-day public comment period for the SCEA. However, the public record for the Project will remain open until the City Council has made a determination to adopt the SCEA. Public comments can be submitted to the City Planning Department or the City Clerk via the Council File Number 18-0889 for consideration as part of the public record.

Note: In addition to the written comments submitted to the Department of City Planning by Mr. Woo, a representative for Mr. Woo spoke at the Advisory Agency Hearing on October 10, 2018, confirming that the public comment period for the SCEA was open until October 15, 2018. No other comments regarding the Project or the SCEA were submitted by the representative at that time.

ATTACHMENT A

COMMENT LETTERS


Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

October 10, 2018

May Sirinopwongsagon
City Planning Department
City of Los Angeles
200 N. Spring Street, Room 621
Los Angeles, CA 90012

RE: Weingart Projects – Notice of Completion and Sustainable Communities Environmental Assessment

Dear Ms. Sirinopwongsagon:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Weingart Projects (Project) located at 554-562 South San Pedro Street, 555-561 South Cocker Street (Site 1); 600 -628 South San Pedro Street, 611-615 South Cocker Street, 518-552 East 5th Street (Site 2) in the City of Los Angeles (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by the ir design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

The purpose of this letter is to briefly describe the proposed Project, based on the Notice of Completion and Sustainable Communities Environmental Assessment, and to outline recommendations from Metro concerning issues that are germane to our agency's statutory responsibility in relation to the Metro bus facilities and services, which may be affected by the proposed Project.

Project Description

The proposed Project includes the development of two distinct **affordable** housing projects for permanent long-term housing with supportive services designed to enable homeless persons and individuals/ families at risk of homelessness on Site 1 and Site 2, respectively. Site 1 will include the demolition and removal of an existing structure, surface parking area, and the construction of 378 Very-Low Income household Units along with 2,250 square feet of commercial floor area. Site 2 includes the demolition and removal of an existing surface parking lot and the development of a mixed-use residential building with 303 residential units, 3,200 square feet of commercial uses, and 17,100 square feet of **office** use.

Metro Comments

In addition to the specific items outlined below, Metro would like to provide the Project Sponsor with a user-friendly resource, the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW), as well as the Adjacent Construction Manual with technical information (also attached). These documents and additional resources are available at www.metro.net/projects/devreview/

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Metro Bus Stop Adjacency

1. Service: Metro Bus Lines 18, 53, 62, and 720 operate on East 6th Street, adjacent to the proposed Project. A Metro bus stop on East 6th Street is directly adjacent to the proposed Project. Other transit operators may provide service in this area and should be consulted.
2. Impact Analysis: With an anticipated increase in traffic during and after construction, Metro encourages any impact analysis to include potential effects on the Metro Bus line(s). Potential impacts could include construction traffic, operation of and shipment/deliveries to the completed Project, and temporary or permanent bus service rerouting.
3. Driveways: Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit. One driveway, located on the southeast corner of 6th Street, is between the Metro Bus stop and the beginning of the curve. The driveway is currently inactive and has a chain-link fence blocking its use. Metro recommends the permanent removal of the inactive driveway in order to avoid future potential conflicts with on-street transit services and pedestrian traffic.
4. Bus Stop Access & Enhancements: Metro encourages the installation of bus shelters with benches, wayfinding signage, enhanced crosswalks and ramps compliant with the Americans with Disabilities Act (ADA), as well as pedestrian lighting and shade trees in paths of travel to access bus stops and other amenities that improve safety and comfort for transit riders. The City should consider requesting the installation of such amenities as part of the development of the site.
5. Final Bus Stop Condition: The existing Metro bus stop must be maintained as part of the final Project. During construction, the stop must be maintained or relocated consistent with the needs of Metro Bus operations. Final design of the bus stop and surrounding sidewalk area must be ADA-compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.
6. Bus Operations Contacts: Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 with any questions and at least 30 days in advance of initiating construction activities. Other municipal buses may also be impacted and should be included in construction outreach efforts.

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Weingart Projects

Notice of Completion of Sustainable Communities Environmental Assessment – Metro Comments

October 10, 2018

Active Transportation

Metro encourages the City to work with the Project Sponsor to promote bicycle use through adequate short-term bicycle parking, such as ground-level bicycle racks, as well as access-controlled, enclosed long-term bicycle parking, for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including: highly visible siting, effective surveillance, easy to locate, and equipment installed with preferred spacing dimensions, so they can be conveniently accessed. The Project Sponsor should coordinate with the Metro Bike Share Program for a potential Bike Share station at this development, if applicable. Additionally, the Project Sponsor should help facilitate safe and convenient connections for pedestrians, people riding bikes, and transit users to/from the Project site and nearby destinations.

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If you have any questions regarding this response, please contact Eddi Zepeda by phone at 213-418-3484, by email at DevReview@metro.net, or by mail at the following address:

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

Sincerely,



Georgia Sheridan, AICP
Senior Manager, Transit Oriented Communities

Attachments and links:

- Adjacent Construction Design Manual
- Adjacent Development Handbook: <https://www.metro.net/projects/devreview/>

ADJACENT CONSTRUCTION DESIGN MANUAL

1.0 INTRODUCTION

1.1 Parties planning construction over, under or adjacent to a Metropolitan Transportation Authority (MTA) facilities or structures are advised to submit for review ~~seven (7)~~ **two (2) hard** copies **and one (1) electronic copy** of their **design** drawings and ~~four (4)~~ copies of their calculations showing the relationship between their project and the MTA facilities, for MTA review. The purpose of the MTA review is to reduce the chance of conflict, damage, and unnecessary remedial measures for both MTA and the parties. Parties are defined as developers, agencies, municipalities, property owners or similar organizations proposing to perform or sponsor construction work near MTA facilities.

1.2 Sufficient drawings and details shall be submitted at each level of completion such as Preliminary, In-Progress, Pre-final and Final, etc. to facilitate the review of the effects that the proposed project may or may not have on the MTA facilities. An MTA review requires internal circulation of the construction drawings to concerned departments (~~usually includes Construction, Operations, Maintenance, and Real Estate~~) **for MTA departments review**. Parties shall be responsible for all costs related to ~~MTA drawing reviews by MTA~~. MTA costs shall be based upon the actual hours taken for review at the hourly rate of pay plus overhead charges. Drawings normally required for review are:

- A. Site Plan
- B. Drainage Area Maps and Drainage Calculations
- C. Architectural drawings
- D. Structural drawings and calculations
- E. Civil Drawings
- F. Utility Drawings
- G. Sections showing Foundations and MTA Structures
- H. Column Load Tables
- I. Pertinent Drawings and calculations detailing an impact on MTA facilities
- J. A copy of the Geotechnical Report.
- K. Construction zone traffic safety and detour plans: Provide and regulate positive traffic guidance and definition for vehicular and pedestrian traffic adjacent to the construction site to ensure traffic safety and reduce adverse traffic circulation impact.
- L. Drawings and calculations should be sent to:

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

MTA DESIGN CRITERIA**ADJACENT CONSTRUCTION DESIGN MANUAL**

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

The design documents shall note the name of the responsible Structural Engineer and Geotechnical Engineer, licensed in the State of California.

2.0 REVIEW PROCEDURE

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

- 2.4 Monitoring of the inside of MTA tunnels and structures shall be required when the adjacent excavation will unload or load the MTA structure or tunnel. Monitoring of vertical and horizontal distortions will include use of extensometers, inclinometers, settlement reference points, tiltmeters, groundwater observation wells, tape extensometer anchor points and load cells, as appropriately required. Acceptable limits of movement will depend on groundwater conditions, soil types and also the length of service the stations and tunnels have gone through. Escorts will be required for the survey parties entering the Metro operating system in accordance with MTA Operating Rules and Procedures. An MTA account number will be established and the costs for the escort monitoring and surveying service will be billed directly to the party or his agent as in section 1.2.
- 2.5 The calculations submitted for review shall include the following:
- A. A concise statement of the problem and the purpose of the calculation.
 - B. Input data, applicable criteria, clearly stated assumptions and justifying rationale.
 - C. References to articles, manuals and source material shall be furnished with the calculations.
 - D. Reference to pertinent codes and standards.
 - E. Sufficient sketches or drawing references for the work to be easily understood by an independent reviewer. Diagrams indicating data (such as loads and dimensions) shall be included along with adequate sketches of all details not considered standard by MTA.
 - F. The source or derivation of all equations shall be shown where they are introduced into the calculations.
 - G. Numerical calculations shall clearly indicate type of measurement unit used.
 - H. Identify results and conclusions.
 - I. Calculations shall be neat, orderly, and legible.
- 2.6 When computer programs are used to perform calculations, the following information shall accompany the calculation, including the following:
- A. Program Name.
 - B. Program Abstract.
 - C. Program Purpose and Applications.
 - D. Complete descriptions of assumptions, capabilities and limitations.
 - E. Instructions for preparing problem data.
 - F. Instructions for problem execution.
 - G. List (and explanation) of program acronyms and error messages.
 - H. Description of deficiencies or uncorrected errors.
 - I. Description of output options and interpretations.
 - J. Sample problem(s), illustrating all input and output options and hardware execution statements. Typically, these problems shall be verified problems.
 - K. Computer printout of all supporting calculations.

MTA DESIGN CRITERIA**ADJACENT CONSTRUCTION DESIGN MANUAL**

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

3.0 MECHANICAL CRITERIA

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

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

4.0 OPERATIONAL REQUIREMENTS

4.1 GENERAL

- A. Normal construction practices must be augmented to insure adequate safety for the general public entering Metro Stations and riding on Metro Trains and Buses. Design of a building, structure, or facility shall take into account the special safety considerations required for the construction of the facility next to or around an operating transit system.
- B. Projects which require working over or adjacent to MTA station entrances shall develop their construction procedures and sequences of work to meet the following minimum requirements:
 - 1. Construction operations shall be planned, scheduled and carried out in a way that will afford the Metro patrons and the general public a clean, safe and orderly access and egress to the station entrance during revenue hours.
 - 2. Construction activities which involve swinging a crane and suspended loads over pedestrian areas, MTA station entrances and escalators, tracks or Metro bus passenger areas shall not be performed during revenue hours. Specific periods or hours shall be granted on a case-by-case basis, **with the approval of Construction Work Plan by MTA Construction Safety Department.**
 - 3. All cranes must be stored and secured facing away from energized tracks, when appropriate.
 - 4. All activity must be coordinated through the MTA Track Allocation process in advance of work activity. **All members of the work crew will be required to attend MTA Safety Training.**
 - 5. **In order to provide a safe zone to maintain adjacent developments. All developments adjacent to Metro At-Grade Stations, Aerial Stations or Track Guideways shall provide a minimum 5 foot setback from the Metro and developer's shared property line to the outside face of the proposed structure at Metro or the developer's property for maintenance to be performed or installed from within the zone created by this setbacks.**

4.2 OVERHEAD PROTECTION - Station Entrances

- A. Overhead protection from falling objects shall be provided over MTA facilities whenever there is possibility, due to the nature of a construction operation, that an object could fall in or around MTA station entrances, bus stops, elevators, or areas designed for public access to MTA facilities. Erection of the overhead protection for these areas shall be done during MTA non-revenue hours.
 - 1. The design live load for all overhead protection shall be 150 pounds per square foot minimum. The design wind load on the temporary structures shall be 20 pounds per square foot, on the windward and leeward sides of the structure.
 - 2. The overhead protection shall be constructed of fire rated materials. Materials and equipment shall not be stored on the completed shield. The roof of the

shield shall be constructed and maintained watertight.

- B. Lighting in public areas and around affected MTA facilities shall be provided under the overhead protection to maintain a minimum level of twenty-five (25) footcandles at the escalator treads or at the walking surface. The temporary lighting shall be maintained by the Party.
- C. Wooden construction fencing shall be installed at the boundary of the areas with public access. The fencing shall be at least eight-feet high, and shall meet all applicable code requirements.
- D. An unrestricted public access path shall be provided at the upper landing of the entrance escalator-way in accordance with the following:
 - 1. A vertical clearance between the walking surface and the lowest projection of the shield shall be 8'-0".
 - 2. A clear pedestrian runoff area extending beyond the escalator newel shall be provided, the least dimension of which shall be twenty (20) feet.
 - 3. A fifteen (15) foot wide strip (other than the sidewalk) shall be maintained on the side of the escalator for circulation when the escalator is pointed away from a street corner.
 - 4. A clear path from any MTA emergency exit to the public street shall be maintained at all times.
- E. Temporary sidewalks or pedestrian ways, which will be in use more than 10 days, shall be constructed of four (4") inch thick Portland cement concrete or four (4") inches of asphaltic concrete placed **over a minimum four (4") inches of untreated base material**, and finished by a machine.

4.3 OVERHEAD PROTECTION - Operating Right-of-Way Trackage

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

- D. The party shall request access rights or track rights to perform work during non-revenue hours. The request shall be made through the MTA Track Allocation process.-

4.4 OTHER METRO FACILITIES

- A. Access and egress from the public streets to fan shafts, vent shafts and emergency exits must be maintained at all times. The shafts shall be protected from dust and debris. See Exhibit A for details.
- B. Any excavation in the vicinity of MTA power lines feeding the Metro System shall be through hand excavation and only after authorization has been obtained through the MTA Track Allocation process. MTA Rail Operations Control Center shall be informed before any operations commences near the MTA power system.
- C. Flammable liquids shall not to be stored over or within 25 feet horizontally of MTA underground facilities. If installed within 25 to 100 feet horizontally of the structure, protective encasement of the tanks shall be required in accordance with NFPA STD 130. Existing underground tanks located within 100 feet horizontally of MTA facilities and scheduled to be abandoned are to be disposed of in accordance with Appendix C of NFPA STD 130. NFPA STD 130 shall also be applied to the construction of new fuel tanks.

- D. Isolation of MTA Facilities from Blast

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

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

4.5 SAFETY REGULATIONS

- A. Comply with Cal/OSHA Compressed Air Safety Orders Title 8, Division 1, Chapter 4, Subchapter 3. Comply with California Code of Regulations Title 8, Title 29 Code of Federal Regulations; and/or the Construction Safety and Health Manual (Part F) of the contract whichever is most stringent in regulating the safety conditions to be maintained in the work environment as determined by the Authority. The Party recognizes that government promulgated safety regulations are minimum standards and that additional safeguards may be required

- B. Comply with the requirements of Chemical Hazards Safety and Health Plan, (per 29 CFR 1910.120 entitled, (Hazardous Waste Operations and Emergency Response) with respect to the handling of hazardous or contaminated wastes and mandated specialty raining and health screening.
- C. Party and contractor personnel while within the operating MTA right-of-way shall coordinate all safety rules and procedures with MTA Rail Operations Control Center.
- D. When support functions and electrical power outages are required, the approval MUST be obtained through the MTA Track Allocation procedure. Approval of the support functions and power outages must be obtained in writing prior to shutdown.

5.0 CORROSION

5.1 STRAY CURRENT PROTECTION

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

End of Section



May Sirinopwongsagon <may.sirinopwongsagon@lacity.org>

Weingart Projects - ENV-2017-615-SCEA

3 messages

sburke@burkeinvestments.com <sburke@burkeinvestments.com>

Mon, Oct 15, 2018 at 12:41 PM

To: may.sirinopwongsagon@lacity.org

Cc: dburke@burkeinvestments.com, mpburke@burkeinvestments.com, mvburke@burkeinvestments.com, fewhall@burkeinvestments.com

Good afternoon Ms. Sirinopwongsagon,

I am writing in response to the notice I received regarding Weingart's proposed Site 1 and Site 2 projects, referenced above. I am an owner of an industrial building abutting the proposed site 1 location and have not had the opportunity to speak with Weingart regarding this nor seen any of their environmental reports.

1

I would like to ask for an extension of today's deadline for public comments, which would allow time to review/discuss the proposed project that is adjacent to my building with my neighbor, the applicant.

Thank you for your consideration,

Stephanie Burke Wagner

BURKE INVESTMENT COMPANY

949.583.1963

949.583.7208

sburke@burkeinvestments.com

May Sirinopwongsagon <may.sirinopwongsagon@lacity.org>

Mon, Oct 15, 2018 at 1:34 PM

To: sburke@burkeinvestments.com

Cc: dburke@burkeinvestments.com, mpburke@burkeinvestments.com, mvburke@burkeinvestments.com, fewhall@burkeinvestments.com

Hi Stephanie,

In regards to your request for an extension of time for the SCEA comment period, unfortunately I unable to extend the comment period beyond the 30 days. However, I would like to note that while today is the last day of the legally required 30 day comment period, the record is still open because the City Council has not made a determination to adopt the SCEA at this time. As such you can submit comments to myself and the City Clerk via the Council File Number 18-0889 to include the comments as part of the record and for consideration by PLUM and the City Council.

The SCEA in its entirety is available in the following link if you have not already found it: https://planning.lacity.org/eir/SCEAs/documents/WeingartProjects/Weingart_coverPg.html

If the link does not work, you can find it under planning.lacity.org > Environmental Review > Sustainable Communities Environmental Assessment > Weingart Projects

Please feel free to let me know if you have any additional questions or comments that you would like to submit regarding the project.

May Sirinopwongsagon
(213)978-1372
Department of City Planning
Central Project Planning Bureau
200 N. Spring Street, Room 621
Los Angeles, CA 90012

[Quoted text hidden]

May Sirinopwongsagon <may.sirinopwongsagon@lacity.org>

Mon, Oct 15, 2018 at 5:46 PM

To: sburke@burkeinvestments.com

Cc: dburke@burkeinvestments.com, mpburke@burkeinvestments.com, mvburke@burkeinvestments.com, fnewhall@burkeinvestments.com

Hi,

Sorry I just realized I did not include this link in my previous email.

To receive notification regarding the SCEA and any future hearings please subscribe to the email notification on the City Clerk's website for Council File No. 18-0889 or in the link below

<https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=18-0889>

May Sirinopwongsagon
(213)978-1372
Department of City Planning
Central Project Planning Bureau
200 N. Spring Street, Room 621
Los Angeles, CA 90012

[Quoted text hidden]



May Sirinopwongsagon <may.sirinopwongsagon@lacity.org>

Weingart Center Update

2 messages

Judy Huie <judyhuiemena@gmail.com>

Mon, Oct 15, 2018 at 11:52 AM

To: may.sirinopwongsagon@lacity.org

URGENT!!!

I own and manage properties on 6th, Crocker and Towne Ave. This project is directly across from me.

I was informed TODAY of the Weingart Project. Unfortunately I am unable to attend the meeting scheduled for Friday, October 19 and ask that you extend the deadline for public comments. I would like to speak with the Weingart representative to better understand this project and how they plan to mitigate the impact of this type of development.

This is my email and my mailing address is [4977 Santa Anita Ave, Temple City, CA 91780](#).

Please add me to the mailing list for the Weingart Project.

Judy

May Sirinopwongsagon <may.sirinopwongsagon@lacity.org>

Mon, Oct 15, 2018 at 1:38 PM

To: judyhuiemena@gmail.com

Hello,

Could you clarify what meeting you are referring to that is scheduled for Friday Oct 19th?

In regards to your request for an extension of time for the SCEA comment period, unfortunately I unable to extend the comment period beyond the 30 days. However, I would like to note that while today is the last day of the legally required 30 day comment period, the record is still open because the City Council has not made a determination to adopt the SCEA at this time. As such you can submit comments to myself and the City Clerk via the Council File Number 18-0889 to include the comments as part of the record and for consideration by PLUM and the City Council.

Your name and mailing address have been added to the mailing list for future hearings regarding VTT-74852 and CPC-2017-614-GPAJ-ZCJ-HD-SPR.

To receive notification regarding the SCEA and any future hearings please subscribe to the email notification on the City Clerk's website for Council File No. 18-0889 or in the link below

<https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnnumber=18-0889>

Please let me know if you have any additional questions or comments that you would like to submit for the record.

Sincerely,

May Sirinopwongsagon
(213)978-1372
Department of City Planning
Central Project Planning Bureau
200 N. Spring Street, Room 621
Los Angeles, CA 90012

[Quoted text hidden]



May Sirinopwongsagon <may.sirinopwongsagon@lacity.org>

ENV-2017-615-SCEA

4 messages

Estela Lopez <elopez@centralcityeast.org>

Fri, Oct 12, 2018 at 2:34 PM

To: May Sirinopwongsagon <may.sirinopwongsagon@lacity.org>

Dear May, please see the attached letter requesting an extension of the SCEA comment period. Thank you.

1

Cordially,

Estela Lopez, Executive Director

Downtown LA Industrial District BID

725 Crocker Street

LA 90021

213.228.8484



ENV-2017-615-SCEA extension.pdf

88K

May Sirinopwongsagon <may.sirinopwongsagon@lacity.org>

Mon, Oct 15, 2018 at 1:30 PM

To: Estela Lopez <elopez@centralcityeast.org>

Hi Estela,

In regards to your request for an extension of time for the SCEA comment period, unfortunately I unable to extend the comment period beyond the 30 days. However, I would like to note that while today is the last day of the legally required 30 day comment period, the record is still open because the City Council has not made a determination to adopt the SCEA at this time. As such you can submit comments to myself and the City Clerk via the Council File Number 18-0889 to include the comments as part of the record and for consideration by PLUM and the City Council.

Sincerely,

May Sirinopwongsagon
(213)978-1372
Department of City Planning
Central Project Planning Bureau
200 N. Spring Street, Room 621
Los Angeles, CA 90012

[Quoted text hidden]

Estela Lopez <elopez@centralcityeast.org>

Mon, Oct 15, 2018 at 2:17 PM

To: May Sirinopwongsagon <may.sirinopwongsagon@lacity.org>

Thanks. As promised, I am organizing a meeting for the project's immediate neighbors to meet with the applicant and their consultants. There are language barriers with some neighbors, others received the notice but didn't understand the scope of the project. In any event, the applicant failed in their due diligence to ensure their neighbors were aware. In other neighborhoods, no developer would even think of building three towers without having held numerous conversations with their neighbors. So I am doing their work for them. I will advise anyone who wishes to comment to do so to you, the Clerk and the Council office. Also the Planning Commission, right?

2

From: May Sirinopwongsagon <may.sirinopwongsagon@lacity.org>

Sent: Monday, October 15, 2018 1:31 PM

To: Estela Lopez <elopez@centralcityeast.org>

Subject: Re: ENV-2017-615-SCEA

[Quoted text hidden]

May Sirinopwongsagon <may.sirinopwongsagon@lacity.org>

Mon, Oct 15, 2018 at 5:26 PM

To: Estela Lopez <elopez@centralcityeast.org>

Hi Estela,

Thank you for the update.

Sincerely,

May Sirinopwongsagon
(213)978-1372
Department of City Planning
Central Project Planning Bureau
200 N. Spring Street, Room 621
Los Angeles, CA 90012

[Quoted text hidden]



Central City East Association

Los Angeles Downtown Industrial District
Business Improvement District

Board of Directors

October 12, 2018

Chairperson

Mark Shinbane
Ore-Cal Corporation

Vice-Chair

Matt Klein
HBK Investments

Treasurer

Dilip Bhavnani
Legendary Developments, LLC

Secretary

Ernest Doizaki
Kansas Marine

May Sirinopwongsagon
Department of City Planning
Central Project Planning Bureau
Los Angeles City Hall
200 N. Spring Street, Room 621
Los Angeles, CA 90012

RE: ENV-2017-615-SCEA

Andrew J. Bales
Union Rescue Mission

Drew Bauer
Young's Market Company

Richard Gardner
L.A. Wholesale Produce Market

Howard Klein
Ocean Beauty Seafoods

Carolyn Leslie
Atlas Capital Group LLC

Larry Rauch
Los Angeles Cold Storage

Bob Smiland
Inner City Arts

Michael Tansey
Peterson/Tansey

Chairman Emeritus
Charlie Woo
Mega toys

Executive Director

Estela Lopez

Dear Ms. Sirinopwongsagon,

The above-referenced proposed project is within the boundaries of the LA Downtown Industrial Business Improvement District, which is administered by the Central City East Association (CCEA). We respectfully request an extension to the public comment period for this project, which currently ends on Monday, October 15, 2018.

The applicant has not been in recent contact with the project's surrounding neighbors. There were two meetings, one on April 7, 2015 before any project application was filed, and a second meeting on June 14, 2017. There've been no direct meetings with adjoining businesses since that time. Goods movement is vital to these industrial businesses and if this project is approved, it will not have benefited from the important feedback from those most impacted. This feedback would inform the applicant's mitigation measures affecting haul routes, street circulation, and other similar construction impacts. Many of the industrial businesses in this zone are part of the regional frozen food distribution network that relies on accurately timed deliveries and shipments. A business immediately adjacent to the project's Site 1 is a commercial kitchen that fulfills orders throughout the day.

Additionally, the applicant's representative stated in their presentation on October 10, 2018 that this project lies outside of the required zones for pedestrian lighting and there was no mention of what, if any, additional pedestrian lighting the project will offer. Tragically, this community has the highest number of unsheltered individuals in the nation. Approximately 2,000 persons live on the sidewalks in Skid Row. One of the reasons they are so often victims of violence is that these streets

are dark. As a century-old industrial area, Central City East has only utilitarian lighting. It does not have the same requirements for pedestrian lighting as do other communities. A project such as this could contribute in an important way to improving the safety of the public realm. We would like to have further conversations with the applicant on the issue of pedestrian lighting.

5
(Cont.)

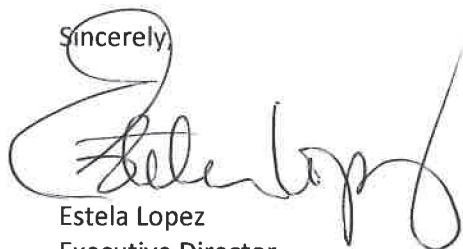
As the organization that administers the Business Improvement District in this area, we are offering to coordinate a meeting quickly for the applicant to meet with their industrial neighbors. We are already in discussion with the applicant regarding this, and we believe this will be accomplished in the very near future.

6

For this reason, we are submitting our request for a modest extension of the public comment period. Thank you for your consideration, and please feel free to contact me if you have any questions.

7

Sincerely,



Estela Lopez
Executive Director



May Sirinopwongsagon <may.sirinopwongsagon@lacity.org>

ENV-2017-615-SCEA

2 messages

Ann D'Amato <ann@3dnetworkscorp.com>
To: may.sirinopwongsagon@lacity.org

Mon, Oct 15, 2018 at 3:48 PM

Please see attached letter from adjacent property owner.

Thank you.

Respectfully,

Ann D'Amato



Ann D'Amato, President

o: 213.258.3082 • m: 310.963.2981

w: www.3dnetworkscorp.com

Public Policy, NAWBO-LA

National Association of Women Business Owners, Los Angeles Chapter
www.nawbola.org

Weingart Letter.pdf
801K

May Sirinopwongsagon <may.sirinopwongsagon@lacity.org>
To: ann@3dnetworkscorp.com

Mon, Oct 15, 2018 at 5:45 PM

Hello,

Thank you for your comments. It has been added to record.

I would like to clarify that in regards to the comment about "spot zoning" made at the public hearing, I would like to clarify that the comment was made from a representative of the Bureau of Engineering in terms of applying the Collector Street Standards or Industrial Collector Street Standards and not as it relates to the actual requested entitlements or the requested zone change.

In regards to your request for an extension of time for the SCEA comment period, unfortunately I am unable to extend the comment period beyond the 30 days. However, I would like to note that while today is the last day of the legally required 30 day comment period, the record is still open because the City Council has not made a determination to adopt the SCEA at this time. As such you can submit comments to myself and the City Clerk via the Council File Number 18-0889 to include the comments as part of the record and for consideration by PLUM and the City Council.

To receive notification regarding the SCEA and any future hearings please subscribe to the email notification on the City Clerk's website for Council File No. 18-0889 or in the link below

<https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=18-0889>

Please let me know if you have any additional questions or comments that you would like to submit for the record.

Sincerely,

May Sirinopwongsagon
(213)978-1372
Department of City Planning
Central Project Planning Bureau
200 N. Spring Street, Room 621
Los Angeles, CA 90012

[Quoted text hidden]

2 attachments



Woo Properties
630 S San Pedro Street
Los Angeles, CA 90014

October 15, 2018

VIA E-MAIL

May Sirinopwongsagon
Department of City Planning
Central Project Planning Bureau
Los Angeles City Hall
200 N. Spring Street, Room 621
Los Angeles, CA 90012

Re: ENV-2017-615-SCEA - Comments

Dear Ms. Sirinopwongsagon:

I. INTRODUCTION

We are the owners of the building located at 630-634 South San Pedro Street (the "ABC Toys Building") in the City of Los Angeles ("City"), we appreciate this opportunity to submit comments on the Sustainable Communities Environmental Assessment ("SCEA") prepared by the City in connection with the proposed Weingart Projects ("Project") and being considered under Case No. ENV-2017-615-SCEA. While we recognize and believe in the importance and significance of the Project, and support all City-wide efforts to address the need for more affordable and supportive housing, we must take this moment to underscore the potential for impacts to the ABC Toys Building, located immediately adjacent to the Project, stemming from what is proposed as the area's first-ever high-rise towers for supportive housing.

1

While, to date, we have avoided involving legal counsel, we did so with the hope for greater outreach to us and other stakeholders. Unfortunately, we have still received extremely limited information and been given almost no time to review and comment meaningfully on the SCEA. This was a point raised at the Project's public hearing on October 10, 2018, in response to which the Project applicant's representative agreed to schedule a meeting with community stakeholders to discuss the Project in greater detail and explain potential impacts. The meeting is currently set to occur this Friday, October 19, 2018 at 1:30 p.m. at which we expect highly relevant information to be disclosed with respect to the Project and its potential impacts to surrounding properties. In this regard, to allow for meaningful public comment on the SCEA, we respectfully request the City, as the lead agency, extend the end of the public comment period from October 15, 2018 to a date no earlier than 10 days after the meeting with stakeholders occurs.

2

II. COMMENTS REGARDING ANALYSIS OF POTENTIAL PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

California Public Resources Code Section 21155.2 offers certain benefits under the California Environmental Quality Act ("CEQA") review through streamlining for projects of both local and regional benefits—nevertheless the review must still address and review the Project's impacts. As described below, it is unclear whether the City has fully addressed or analyzed all potential impacts required under SB 375; important data has not been disclosed to the public; and it is unclear whether significant impacts appear not to be fully mitigated.

3

a. Land use consistency

The Project site is currently zoned M2-2D—a zoning designation that restricts uses light industrial uses and prohibits residential uses. The Project site is further designated by the General Plan as Light Manufacturing. The current zoning caps density at zero by prohibiting residential units and limits the maximum allowable Floor Area Ratio ("FAR") to 3:1. Such zoning is consistent with nearly all surrounding properties, except for the cluster R5 properties located west of San Pedro Street as shown below.

4

Among the entitlements requested for the Project (under CPC-2017-589-GPAJ-VZCJ-HD-SPR) are a Zone Change from M2-2D to C2-4D and General Plan Amendment from Light Manufacturing to Regional Commercial. If approved, the proposed Project would become the only property in the area with such zoning and would allow for unlimited density and an FAR of over 8:1. This would allow the Project to be built to 19 stories in height, incorporate 685 dwelling units, approximately 25,000 square feet of supportive service office area, and a total occupancy of 1,420 persons. As stated by City staff at the October 10th hearing for CPC-2017-589-GPAJ-VZCJ-HD-SPR, if approved, the Zone Change and General Plan Amendment could be considered "spot-zoning."

b. Actual Population Growth

The SCEA's analysis relative to the potential impacts surrounding the significant increase in density proposed as part of the Project appears to rely on unsubstantiated assumptions and does not take into account the vulnerability of the select population of the Project.

As stated in the SCEA:

The Project includes the development of up to 685 new residential dwelling units, including approximately 451 permanent supportive units, up to 225 affordable housing units, and 9 manager units, and up to a maximum of 5,450 square feet of retail, 25,493 square feet of philanthropic, and 17,100 square feet of office uses. The maximum residential occupancy for the Project would be 1,420, limited by requirements set forth in the regulatory agreement between the Project Applicant and the HCIDLA. Approximately 95 percent of the future residents of the 451 permanent supportive units would be previously homeless people from within the City. Assuming approximately 2.07 persons-per-unit rate, approximately 887 of the Project's future residents already reside in the City. It is likely that the

5

remaining 533 future residents already live in the City, as well, as discussed in more detail below. However, for purposes of a conservative analysis, it is assumed that the Project could add 533 new residents to the City. In addition, according to the Project Applicant the Project would generate approximately 74 employees.

The assumption that 95 percent of future residents in the Project's permanent supportive units would be previously homeless people from within the City raises questions given that the Project utilizes the Coordinated Entry and Homeless Management Information System ("CES") to select applicants for its permanent supportive housing units. As we understand, CES is a regional and county-wide process developed to ensure that all people experiencing homelessness have fair and equal access to housing and assistance based on their needs and strengths. In this way, we believe, CES matches up homeless individuals to housing based on a score which assesses their greatest need for a particular type of housing, not based on geographic location.

Because CES places individuals from across the County into housing, we would like more information on how the Project applicant will ensure that 95 percent of future residents in the Project's permanent supportive units would be comprised of previously homeless people from within the City. At present, the Project creates the impression that it could create a potentially significant impact by inducing substantial and overly concentrated growth of a vulnerable population in an already highly impacted area.

c. Public Services

The SCEA arrives at the conclusion that the Project would have a "Less Than Significant Impact" on the maintenance of acceptable service ratios, response times or other performance objectives for fire protection, schools, parks and other public facilities and purports to mitigate any potential impacts with respect to police services.

We do not object to the provision of housing for the mentally ill and/or those suffering from addiction. In fact, it should be encouraged. However, the City must ensure that this particular Project provide additional analysis of the issue of managing a population of supportive service tenants in this particular area given its particularly limited public service availability.

d. Traffic and Queuing

As described at the hearing, the Project proposes approximately 25,000 square feet of floor area to be open to and utilized by the public for various services. We do not understand how the obvious potential for persons accessing these services to queue outside of the Property along the sidewalk will not directly impact the ABC Toys Building and other nearby businesses.

For the foregoing reasons, we respectfully ask that the City, both consider the above initial comments to the SCEA and extend the public comment period from October 15, 2018 to a date no earlier than 10 days after the Project applicant's meeting with stakeholders occurs.

5
(Cont.)

6

7

8

Thank you,

A handwritten signature in blue ink that reads "Charles Woo". The signature is written in a cursive, flowing style.

Charles Woo,
General Partner

ATTACHMENT B

SUPPORTING DOCUMENTATION



THEPEOPLECONCERN

Because everyone should be housed, healthy and safe.
OPCC & LAMP COMMUNITY UNITED

October 19, 2018

Tonja Boykin
Chief Operating Officer
566 S. San Pedro St.
Los Angeles CA 90013

Re: Weingart Towers
Coordinated Entry System

Dear Ms. Boykin,

As the Coordinated Entry System (CES) lead for Service Planning Area (SPA) 4, where Weingart Towers is located, we have the goal and the responsibility of getting people experiencing homelessness in SPA 4 into permanent housing. As such the following policies and procedures are in place:

- Referrals for applicants for tenancy come from SPA 4.
 - All SPA 4 referrals must be exhausted prior to considering people from other SPAs. There are approximately, 14,000 homeless individuals in SPA 4 according to the most recent homeless count.
- The CES lead for SPA 4, The People Concern, conducts street outreach to people who are homeless in the immediate area and to shelters and transitional housing facilities in the immediate area, to engage them in the CES and in the housing application process.
- The Weingart Center will conduct its own neighborhood focused marketing and outreach efforts in coordination with The People Concern and the CES, including street outreach, to engage people who are homeless in the immediate area in the housing application process.

Thank you for your efforts to provide housing and services to people experiencing homelessness in the Downtown LA community. Please contact me at (213) 488-9559 Ext. 114 or by e mail at hlopez@thepeopleconcern.org with any questions.

Sincerely,

Hazel Lopez
Director of CES and Community Engagement
The People Concern