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OF HILLSIDE AND CANYON ASSOCIATIONS, INC.

Srimal Hewawitharana, Environmental Review Coordinator Department of City Planning City Hall, Room 750 200 N. Spring Street Los Angeles, CA 90012

October 14, 2013

Re: 8150 Sunset Blvd Mixed Use Project - ENV -2013-2552-EIR

Dear Mr. Hewawitharana:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 41 homeowner and residents associations spanning the Santa Monica Mountains, from Pacific Palisades to Mt. Washington. The Federation's mission is to protect the property and quality of life of its over 200,000 constituents and to conserve the natural habitat and appearance of the hillside and mountain areas in which they live.

The Federation heard a presentation on the proposed development at 8150 Sunset Blvd at its October 2013 meeting. The Board was concerned about many aspects of the project, especially the height, density, traffic and potentially negative impacts to the many hillside communities which surround this proposed development. The Board passed a motion to express some of the concerns discussed in the Initial Study to the Department of City Planning for the preparing of the project's Draft EIR.

The areas of concern that must be addressed in the Draft EIR are:

Geology and Soils - As this site is located on the Hollywood Fault, special attention must be given to the Geology and Soils review.

Historic Resources - The Los Angeles Conservancy position is that the Chase Bank Building (formerly Lytton Savings) is covered under the Historic Resources provision of CEQA and should be considered as such.

Height - The two buildings proposed to be built for this development are the highest buildings (108 feet and 191 feet) in the area and will negatively impact the surrounding multi-residential and single family neighborhoods in and around the subject site. Alternative designs which will lower the height of the buildings to be compatible with neighborhood character must be proposed and reviewed in the the DEIR so that the development fits the neighborhood.

Due to the proposed height of these two buildings, a roof-top helipad would be necessary for emergency purposes. All impacts regarding the potential use of helicopters on top of these tall buildings must be addressed and mitigated in the DEIR.

Traffic Impacts - As this proposed development sits at the mouth of one of the most traveled intersections in Los Angeles, Sunset Blvd. and Crescent Heights, and is

surrounded by several hillside areas, including Laurel Canyon – a major North/South canyon route for over 40,000 commuters – the traffic impacts are exponential. The parking circulation plan in the Initial study is inadequate and an alternative plan must be included in the DEIR that addresses turn lanes; ingress and egress in and out on Crescent Heights and Sunset Blvd., as well as impacts to Hayvenhurst Avenue.

Compatibility with the Hollywood Community Plan - This area is not classified as a "regional center" in the new Hollywood Community Plan but the development, as currently proposed, appears to be designed for a regional center. The zoning for the area is C4-1D (or is it C2-1D?) and is currently designated as "Neighborhood Office Commercial" which is generally in a lower rise and lower density area serving a smaller neighborhood and not a destination location. The Hollywood Community Plan encourages large development to be around transportation nodes which this is not.

Cumulative Impacts - CEQA requires that all impacts which are individually limited but cumulatively considerable must be combined with the impacts of related projects in proximity to the project site as the impacts are greater than those of a single project. This proposed development must be viewed in relation to the over 1 million square feet of current and future development along Sunset Boulevard in both Los Angeles and the City of West Hollywood – less than a mile away from the proposed development at 8150 Sunset Blvd. Some of the current and proposed developments are: 8430 Sunset Blvd. at Olive (House of Blues development); 8474 - 8544 Sunset Blvd. at La Cienega; 8950 Sunset Blvd. at Hilldale; 8955 Santa Monica Blvd. at Crescent Heights; and 9040 Sunset Blvd. at Doheny.

Density: The plans and currently proposed designs for this property will result in an increase in density in the area and the surrounding residential neighborhoods. Four restaurants totaling over 22,000 square feet; a gym/studio of over 8,000 square feet; and a 25,000-square foot organic grocery store will most definitely impact the density in an area that does not have the infrastructure or emergency services to handle such an increase.

Parking - The developer's request for a Variance to increase the number of compact parking spaces from 40% allowed by the LAMC to 60% is a concern as it would require tenants to have a particular size of car (compact-sized) to make this parking concept effective. In addition, the rationale of having 900 + bicycle parking spaces instead of car parking spaces appears to be unrealistic. Parking alternative plans need to be included in the DEIR. The use of valets and valet assisted only is a concern. The applicant's representatives stated at a public meeting that the development is NOT a "destination" location. If that is the case, why would there be a need for only Valet parking or Valet assisted parking and no self-parking? An alternative to Valet and Valet-assisted parking only must be included in the DEIR.

Noise impacts - As the proposed development will include four restaurants and outdoor dining at one of the restaurants including live entertainment, the increase of noise levels to the residential areas in and around the site must be addressed in the DEIR.

In conclusion, the 8150 Sunset project as currently proposed is out of scale and character for the neighborhood. The increased traffic alone would have a devastating effect on the residents in the local hillside neighborhoods. The Hillside Federation strongly urges the Department of City Planning to consider only those alternatives that are lower with less density so as to reduce the impact on and disruption in the community.

Sincerely,

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cc: Tom LaBonge Carolyn Ramsay Jonathan Brand Michael LoGrande