

VERMONT WESTERN STATION NEIGHBORHOOD AREA PLAN DEVELOPMENT STANDARDS AND DESIGN GUIDELINES pp8-9

B. Shared Streets [woonerf]. This component of the open space strategy is modeled after the European notion of a "woonerf." Woonerf is a Dutch word meaning "street for living" and is the common term for a type of street that is equally shared by pedestrians, bicycles, and low-speed cars. Vehicles are slowed to walking speed by placing trees, planters, parking areas, chicanes and other obstacles in the street. Vehicles are considered as intruders, and the street, while available to the public, it is not intended to be used for pass through vehicle trips.

The shared street concept is appropriate when a neighborhood intends to be more pedestrian accessible. It is based on the belief that the street is a physical and social part of the community that should be simultaneously available for vehicular movement, social interaction and civic activities. The public domain of the pedestrian is reclaimed. The streets are evaluated in the planning process in terms of noise, pollution, social interaction, visual aesthetics, as well as ability to carry vehicular and non-motorized traffic. An example of a variation of a shared street is in the Plan Area on L. Ron Hubbard Way between Sunset Boulevard and Fountain Avenue.

The shared street accomplishes a number of public policy goals: open space is provided within neighborhoods where it is most likely to be used; because streets are not closed or vacated no public monies are needed to buy the land; it facilitates non-motorized trips and allows pedestrians to take

better advantage of the transit system; it provides public spaces for more social interaction; it reduces the heat island effects created by large unshaded expanses of black asphalt; it diminishes pollution run off by providing permeable surfaces that replace the existing asphalt; it provides more opportunities to add to the urban forest thereby improving the air quality; and the open space is more equally distributed throughout the Plan Area.

More than thirty residential blocks have been identified as potential sites for shared streets. These potential sites are shown on the Plan Summary Map. The general criteria for selecting these streets are: 1) Primarily residential uses; 2) Not necessary or not desirable for the segment to be part of the regional vehicle circulation pattern; 3) Street of sufficient roadway width of two lanes and at least one parking lane can be accommodated; 4) street can be configured with other shared streets and small parks into a pedestrian or bicycle network, especially for school children accessing a local school and 5) due to legal and safety considerations, full height curbs and side walks will be provided. Additional criteria needed to make the final choices will require further analysis of the local street parking needs, roadway configuration and a consensus among the residents and property owners along the block that a shared street is what they want for their neighborhood.

A shared street would have the following physical components:

- 1) A sign at each entrance, and a special gateway treatment signaling that this is a slow street, possibly including the use of bollards, landscaped islands or large planters;

2) Removal of the asphalt and replacement with a permeable pavement treatment or grass interspersed with pavers;

3) the entire public right of way including existing sidewalks and parkways should be considered as part of the shared street width when designs are being prepared;

4) A low landscaped barrier between the bike and pedestrian paths, and the vehicle lanes;

5) full height curbs and sidewalks are required;

6) abundant use of shade trees and drought resistant landscaping that supports native species of butterflies and other small fauna; and

7) use of several of the following traffic calming techniques-chicanes, speed bumps, angle-parking, frequent landscaped curb extensions, roadway narrowing, sidewalk widening, and one-way street coupling.

Introduction to Eastwood's Woonerfs

Hollywoodians Encouraging Logical Planning

H.E.L.P.

1926 North Saint Andrews Place
Hollywood, California 90068

Following is Eastwood Coalition's New Visions For Parks, Plazas, and Woonerfs. This comprehensive plan which will involve Gramercy and Garfield Places between Hollywood Boulevard and Franklin Avenue, has been designed to complement the \$200 Million Dollar CRA Hollywood-Western Project.

Eastwood developed its woonerfs approach in order to combat some of the serious environmental, economic and social problems of this neighborhood. A crucial aspect of the Woonerf project is the nature and extent of the commercial development on the Bond lot.

As the booklet shows, Eastwood's woonerf proposal is very pro-development and promises to provide a revitalization of this entire neighborhood and greatly enhancing the CRA project's profitability and to financially benefit the lots at issue.

For reasons unknown to any one in the neighborhood, Bond Capital has chosen to be the proverbial "bomb thrower" and insists on constructing an ill-conceived and inappropriate mixed-used project. To date, Bond capital has rebuffed all attempts by the neighborhood and the Neighborhood Council

to discuss the ways in which his project could be compatible with the Woonerf proposal. Bond has rebuffed HUNC's invitation to make a presentation at its PLUM Committee on the grounds that the project is too tentative and that Bond is months away from finalizing anything. The very fact that Bond refuses to communicate with the community until it has "finalized" everything demonstrates that once again Bond is refusing to pay any attention to the community's needs and other projects such as Eastwood's Woonerfs.

When considering the alternate use for this property, please realize that the name of this organization, Hollywoodians Encouraging Logical Planning. We are not opposed to development. We support Eastwood's innovated approach to solving the serious traffic, pollution, parks, and crime problems without taking a single inch of private property, and Eastwood as well as H.E.L.P. encourage logical development.

Some developments, however, are harmful to the community. To the extent one can may discern Bond's intentions, the project appears to be detrimental to everything and everyone around it. It seriously aggravates parking, its anticipated design will adversely affect the St. Francis Hotel which is investing millions of dollars to renovate the hotel. As the following Woonerf booklet shows, the most vital com-

ponent of the St. Francis will be the corner it shares with the Bond lot. By proposing to build on 95% of its lot, Bond is trashing the hotel's plans to revitalize the proposed European style open-air café. As this European style is the theme of the hotel's renovation, the Woonerf proposed large commercial-residential development on the Bond lot along the lines of the Wilshire-Rodeo project. The St. Francis Hotel is being renovated in conjunction with the contiguous CRA Hollywood-Western project.

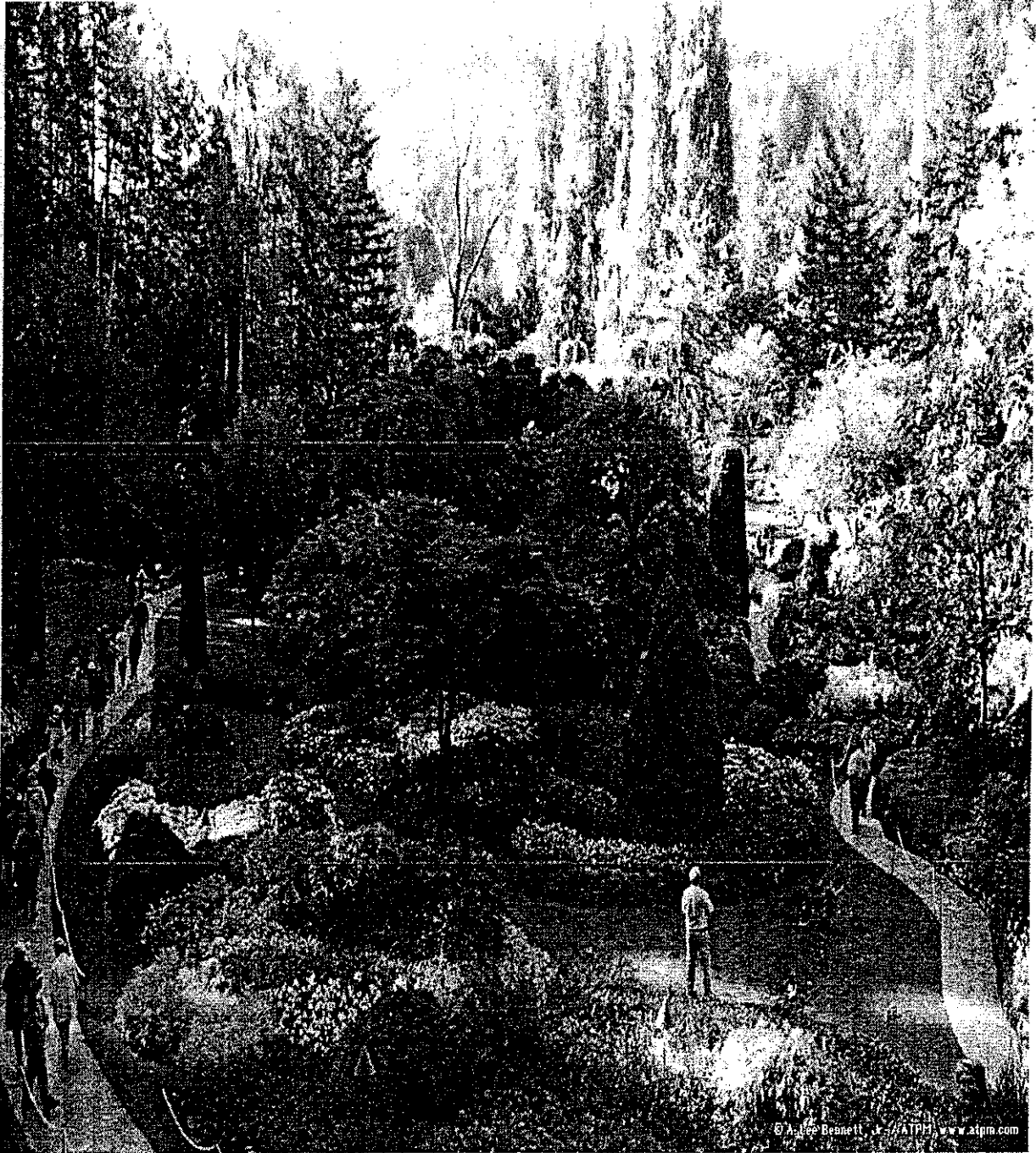
The CRA project on the south side of Hollywood Boulevard is being designed to coordinate with the north side of the boulevard including the St. Francis Hotel and the proposed Woonerfs. H.E.L.P. is reasonable to conclude that Bond has withheld so much information about the nature and style of the project has been omitted from the NOP because Bond once again plans to impose a monstrosity on Hollywood. Bond has a history of constructing ugly buildings, similar to stuffing a sumo wrestler into a bikini.

The fact that Bond shows no concern for the financial loss which it is bringing upon itself does not mitigate the deleterious effects on the St. Francis and the CRA Hollywood-Western project and upon the neighborhood's environment.

As Presently Designed, The Bond Project Deprives The Community of 96,600 square feet of Open Space

Bond's present development deprives the Garfield-Gramercy neighborhood of approximately 96,600 square feet of open space for children to play and neighbors to socialize. That is the equivalent of a 310 x 310 square foot park. That is a very serious environmental impact in a City that is notoriously deficient in parks and plazas. That is twice the size of Bond's entire lot. By coordinating with the community, Bond could have his mixed-use development and the neighborhood could have its desperately needed mini-parks and plazas – at no cost to Bond except a little cooperation.

Eastwood Coalition's New Vision: Parks, Plazas, and Woonerfs



Come stroll through the winding parkland of Eastwood's woonerf with its flowers and open space, but beware some developers have their own vision of high density urban housing for East Hollywood

Some Developers' Motto for East Hollywood Pack 'Em Tight & Pack 'Em High




Some Developers' ideal for housing in East Hollywood
They Forget That We've Already Seen "Mixed-Use"

Some developers' concept of a nice play yard for our children



Eastwood prefers parks, plazas and woonerfs  



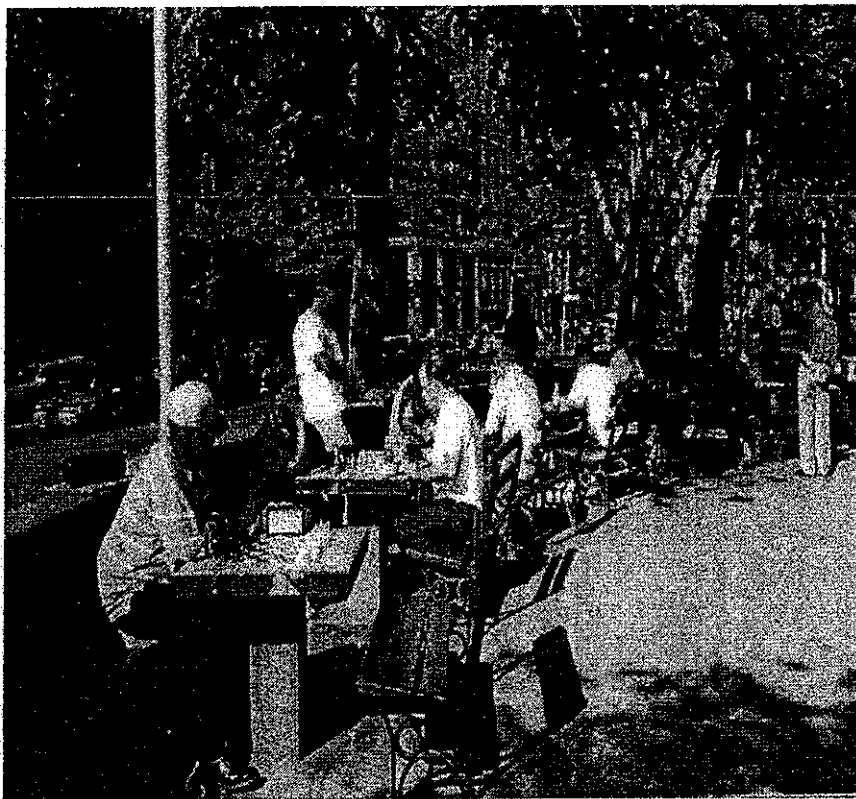
**Come with us to Eastwood's vision of the future
of parks, plazas and woonerfs** 

Garfield and Gramercy Places would each become a one-way, one-lane serpentine street, like a long Lombard Street laid flat, creating a two street woonerf. There are significant advantages to a serpentine street.

1 Its curving design slows traffic, making the street safer.

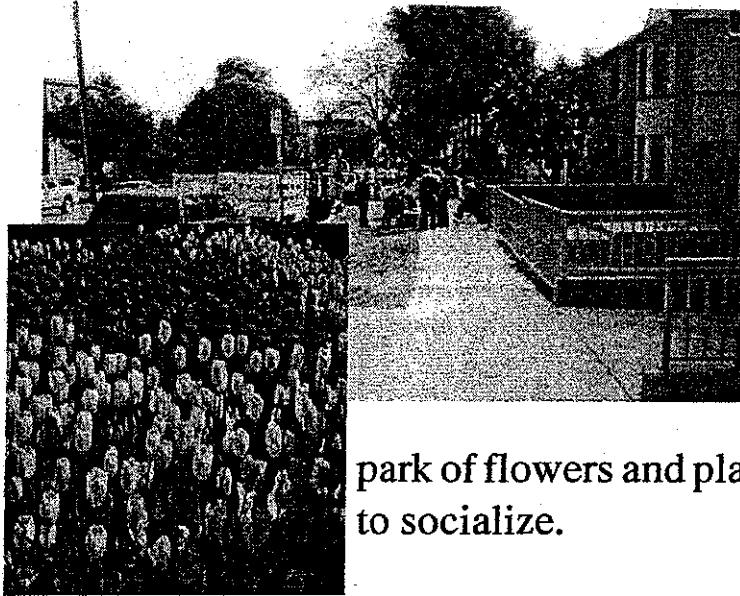
2. The serpentine one-lane, roadway alternately shifts the land mass from one side of the street to the other. Although Lombard Street fills the areas between the roadway and the sidewalks with flowers, these areas can become park areas with tables for checkers and chess and for families to congregate.

As almost everyone on Garfield and Gramercy lives in apartments complex, there is a desperate need for open space in front of their build-ings. The more neighbors congregate in the common area, the more they know their neighbors, making their Neighborhood Watch Program all the more effective. Many cities are designed for the residents to gather in common areas in small plazas. NYC's Washington Square is an excellent example of the community using the common areas.



Most of the world's great cities have parks and plazas like New York City's Washington Square.

There is no reason L.A. cannot recapture land from the excess area of the street in order to create a series of woonerfs. The Eastwood Woonerf could be the first in a series of woonerfs that would greatly enhance life for Angelenos.



The residents along Garfield already are using the limited green space for congregating and playing table games.

A woonerf would recapture so much land from the street that there would be room to create a park of flowers and plazas where residents could gather to socialize.

THE COMMERCIAL BENEFITS OF A WOONERF

The South End of The Garfield-Gramercy Woonerf Would Be Anchored by Two Café Plazas

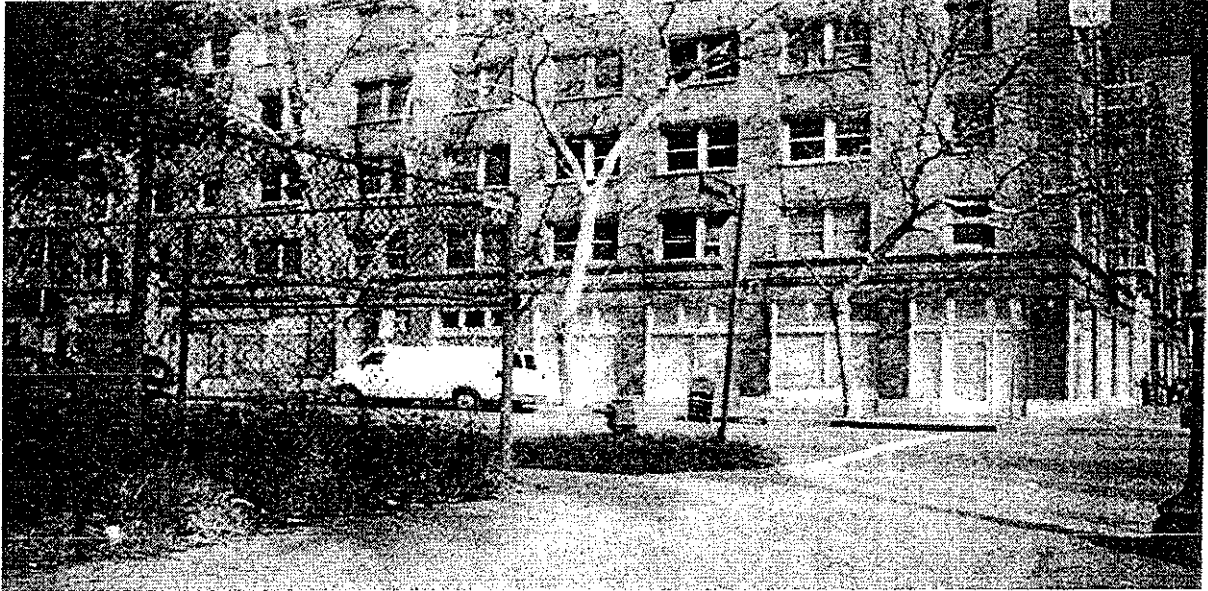
The Smaller Gramercy Café Plaza

Both Gramercy and Garfield will be anchored on their south end along Hollywood Boulevard end by café plazas area. Gramercy already has a café on either side of its entrance, and hence, the existing restaurants would only have to expand their outside seating into the extra plaza area which will result from narrowing the road to a one-lane northbound street.

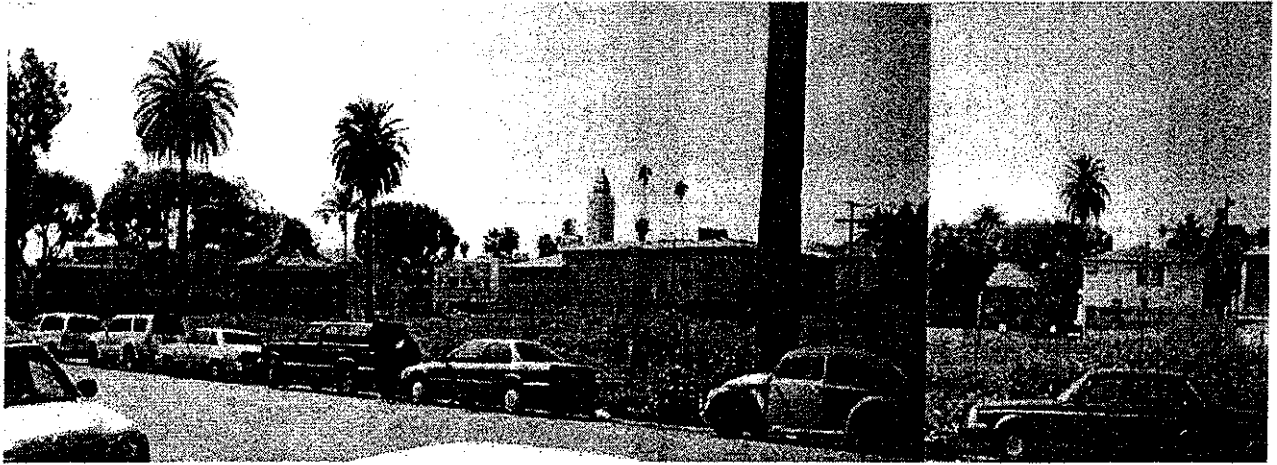


The Large St. Francis Café and Plaza Anchors the South End of Garfield

The St. Francis Hotel's architecture at its southwest corner is ideal for remodeling into a outdoor large Parisian café and shops.

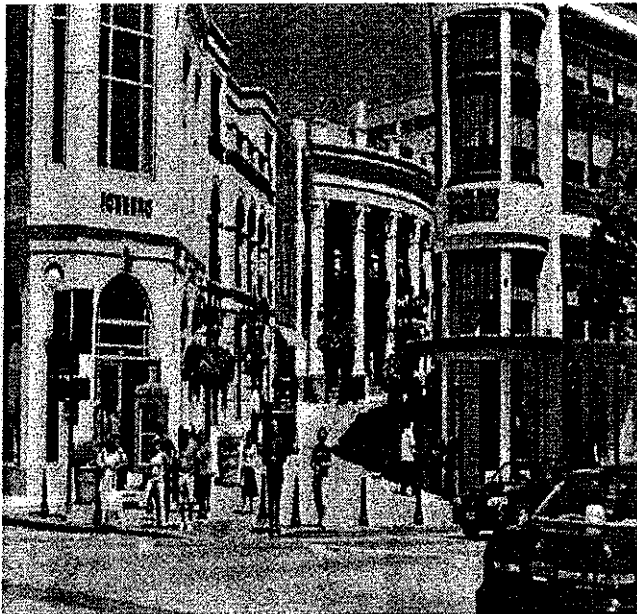


A desolate corner is revitalized! Reducing Garfield to a one lane creates ample space for an expansive café which will set a romantic tone for this entire project.



The Commercial Potential Of The North-West Corner Of Garfield Place at Hollywood Boulevard

The lot on the west side of Garfield is deep and wide. It is deep enough to construct a "for pay" 200 car garage for the neighborhood at the back end (*far right*). This *for-pay* parking structure is crucial as removing parked cars from Gramercy and Garfield is crucial to the commercial viability of this area. If the area deteriorates further, it will fill with Default Tenants, i.e. those who cannot afford better surroundings. Default Tenants care nothing for the property upkeep and have a high incidence of crime. Over the garage, there is room for a landmark development. Beverly Hills spectacularly transformed a flat piece of land by building a village over a large parking structure.



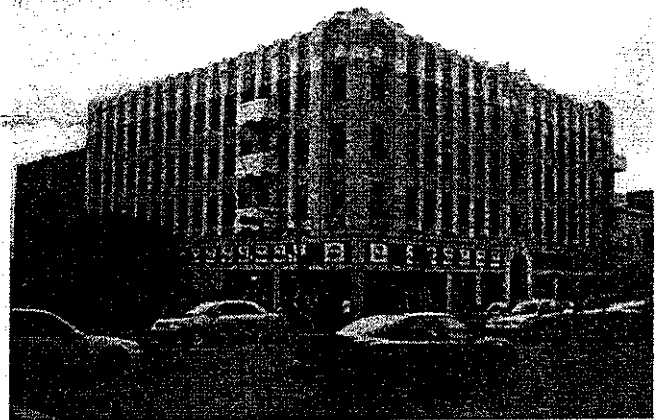
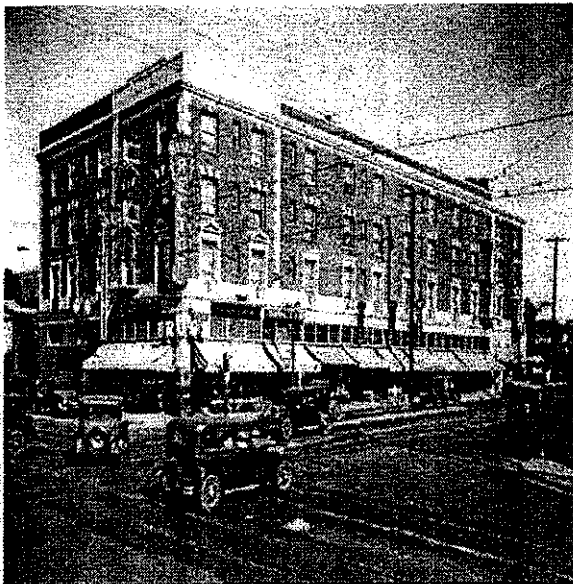
The frontage on Hollywood Boulevard is of overwhelming importance for the projects success. The open expanse of the St. Francis Café has to continue down Hollywood Boulevard to the two open-air cafes at Gramercy. Sad to say, Hollywood has regrettable history of over-building and once again Hollywood is reverting to a congregation of tenements.



The photo to the right is a current developer's idea of the amount of space "poor people" need for their front yards. Yes, that redish gate leads to the front doors of the projects just south of the Metro Building. Hollywood has been down this road once before.

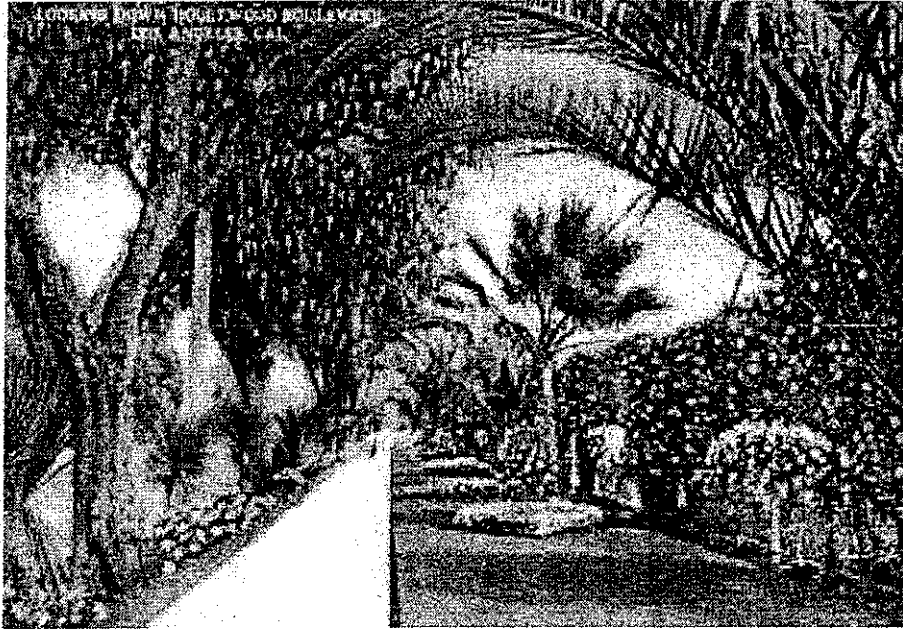


↘ n/w corner Hollywood & Western 1930



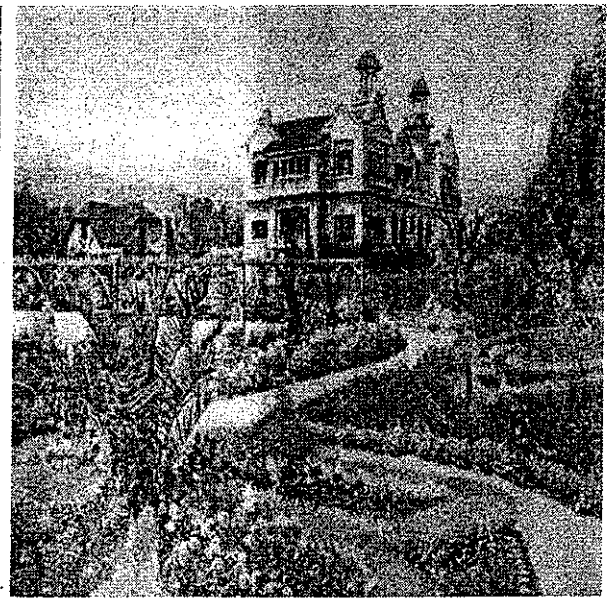
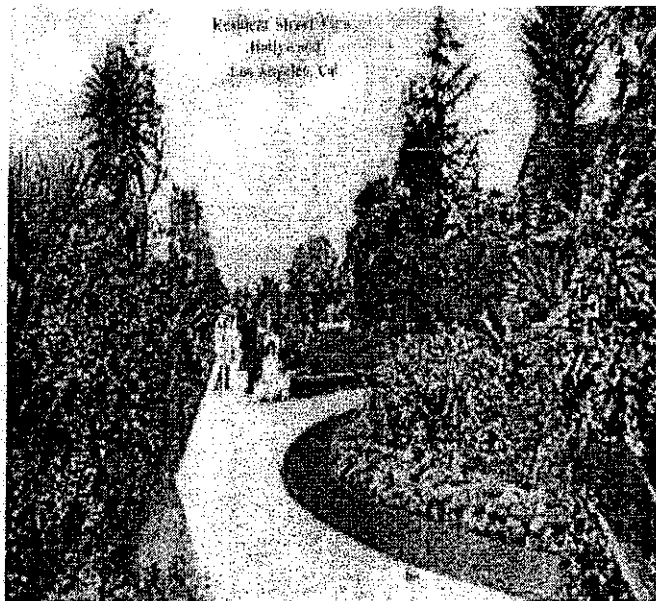
The folly of the Mayer Building afflicts us to this day – built to the property's edge with no parking, it's a nightmare for developers.

Early Hollywood had a reputation for gracious living with many gardens including Hollywood Boulevard itself. By harkening back to the early days, when Hollywood was made world famous, we can find the direction for the St. Francis Plaza along Hollywood Boulevard. A transcend vision of beauty will pay bountiful economic dividends.



Turn of the century postcard of Hollywood Boulevard.

Traditionally, the streets of Hollywood were lined with bushes and gardens.

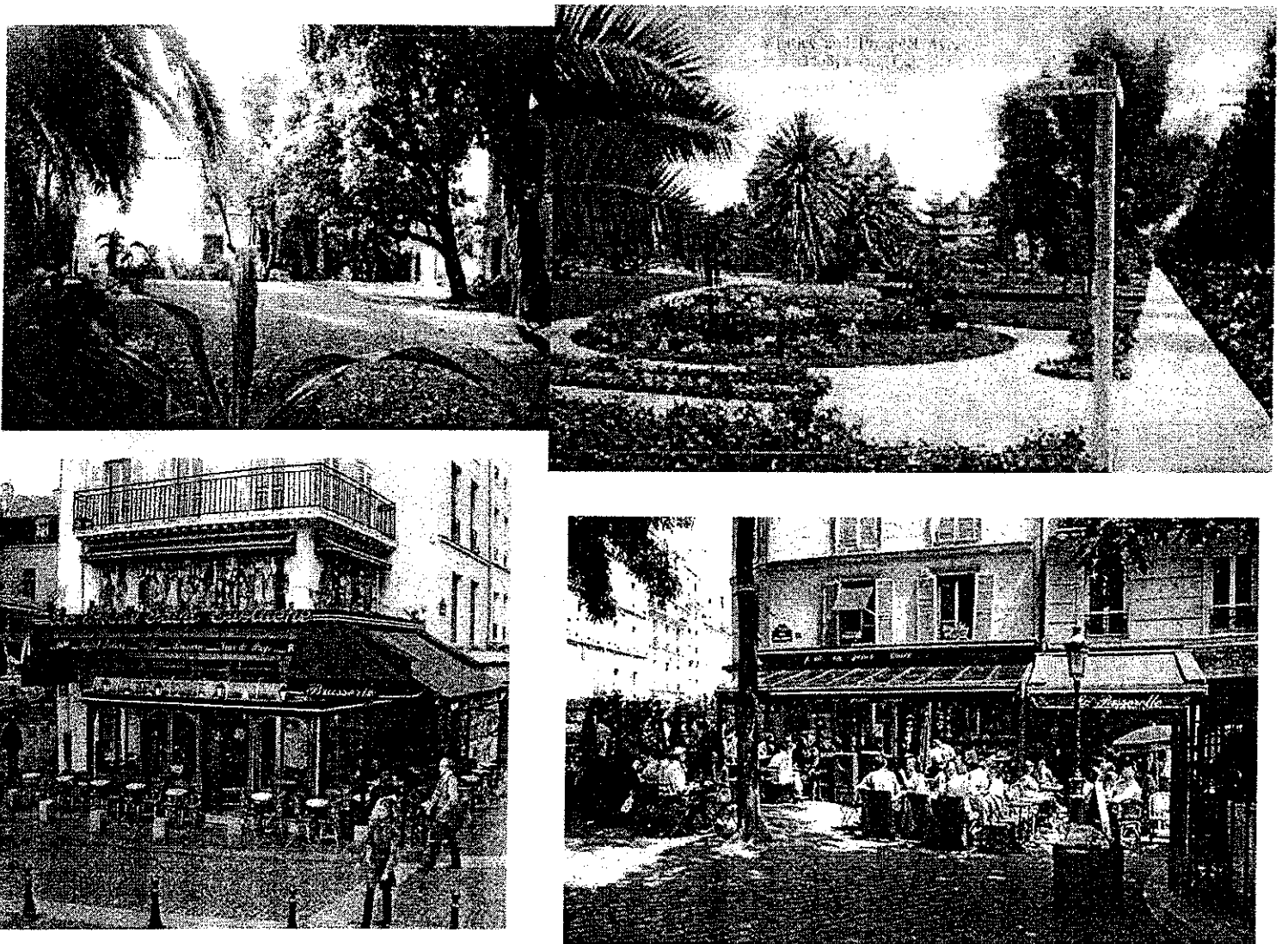


Woonerfs give us the opportunity to re-create the Gardens of Hollywood along the street scape between the St. Francis Café at Garfield and the Gramercy cafes to the West.

We can chose crowded neighborhoods that look like this:



or return to an urban village that looks like this:



WOONERFS PROTECT THE DEVELOPERS' INVESTMENTS

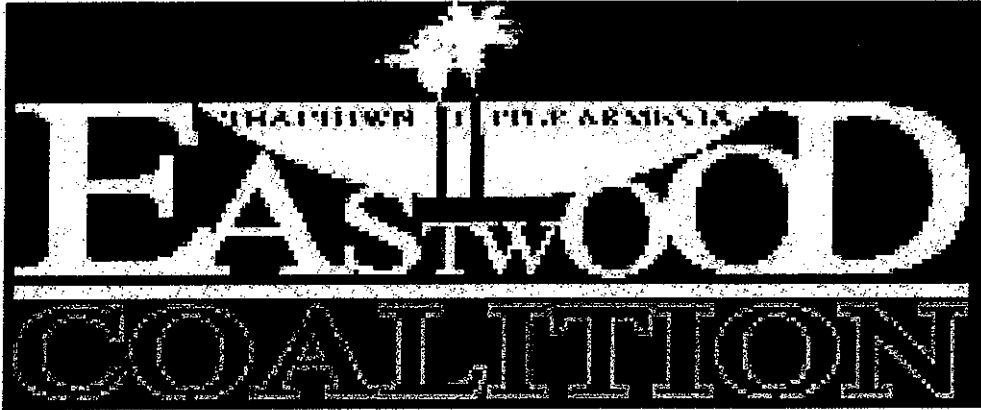
Woonerfs are relative inexpensive because no land has to be purchased. Turning the streets into parklands and plazas can be accomplished without necessarily tearing up the pavement or even changing any of the sewers or driveways. Grass and paving stones for plazas can be placed over the existing road way.

By drawing people outside their apartments, a sense of community is created and according to the L.A.P.D., the number one crime deterrent is a vigilant Neighborhood Watch Association. Thus, the crime is greatly reduced.

Woonerfs are recommended by SNAP and they reduce the traffic without violating Vehicle Code § 21101.6.

By turning ugly pavement into plazas and parks, the property values along both streets are greatly enhanced and stable neighborhoods are vital for any commercial development along Hollywood Boulevard. Until recently this area was infested with the White Fence Gang which has moved only a few blocks south. If the slumification of this area continues, the White Fence Gang is certain to re-inhabit these streets. By stabilizing the neighborhood, the White Fence Gang will be unable to afford to move back to Garfield, thereby protecting the investment of the St. Francis and other developers.

Of course, building another world famous Hollywood landmark will make the area commercially viable and a wonderful place to live. The developers can gain international recognition for building a true urban garden village along with successful commercial development.



**1740 Gramercy Place #108
Hollywood, California 90028
Phone 323-856-9330**

The Gramercy-Garfield Woonerf
The Once in a Life Time Opportunity

Parks, Plazas & Woonerfs

2005 ©

Summary and Background of This Dispute

1998

1998

1998

1998

Summary and Background of This Dispute

The following information was obtained from the records of the
company and is presented for your information. It is not intended
to constitute an offer of insurance or any other financial product.
The information is provided for your information only and should not
be used as a basis for any investment decision. The information
is not intended to be a substitute for professional advice.

The following information was obtained from the records of the
company and is presented for your information. It is not intended
to constitute an offer of insurance or any other financial product.

The following information was obtained from the records of the
company and is presented for your information. It is not intended
to constitute an offer of insurance or any other financial product.

The following information was obtained from the records of the
company and is presented for your information. It is not intended
to constitute an offer of insurance or any other financial product.

Summary and Background of This Dispute

The following information was obtained from the records of the
company and is presented for your information. It is not intended
to constitute an offer of insurance or any other financial product.

The following information was obtained from the records of the
company and is presented for your information. It is not intended
to constitute an offer of insurance or any other financial product.

Hollywoodians Encouraging Logical Planning

H.E.L.P.

1926 North Saint Andrews Place

Hollywood, California 90068

SUMMARY

THE BACKGROUND OF THIS DISPUTE

The background of the dispute over this EAF is placed in the summary as one cannot grasp the "back story" without first understanding the nature and extent of the CRA Hollywood-Western Project and Eastwood's Woonerfs proposal. Because Bond Capital refuses to discuss its project with the community, this summary is put together without the benefit of Bond Capital's in-put.

Bond has history of not obtaining community support for its participation in the CRA project or its development of this lot.

I. When Bond was bidding on CRA Hollywood-Western project last summer, it so alienated so many community members that it was voted off the CRA project. Although the official explanation was that Bond did not own property within the CRA area, those who attended the CRA meetings knew that the basic cause was that Bond had alienated most of the community members. The CRA panel is composed of representatives from the Mayor's Office, from Councilman LaBonge's Office and from Councilman Garcetti's Office. In addition, the CRA panel has representatives from a number of community groups such as Eastwood Coalition, the Hollywood United Neighborhood Council the Greater Griffith Park Neighborhood Council, the Hollywood Studio District Community Council (in formation), and the Thai community.

2. When Bond was promoting this site for the Whole Foods Market, Bond was unable to gain the support of the Eastwood Coalition, the largest and most active community grassroots organization in the area. In fact, Bond did not gain the support of a single community group for its Whole Foods development.

3. When Bond went to the Hollywood United Neighborhood Council [HUNC] to obtain support for the Whole Foods Project, HUNC was divided into two groups. Those who would provide only tentative support based upon several serious restrictions on the "Whole Foods Project" and those who withheld all support from Bond due to its past and present deceptive behavior. The latter position prevailed, and HUNC gave no support Bond's Whole Food Project.

Thus, contrary to Bond's statements that it has made about working with the community and that only a few malcontents oppose its projects, Bond failed to work with a single community group and has been rejected by everyone from the CRA, to Eastwood Coalition, to HUNC.

When one looks at the nature of extent of the multi-million dollar CRA project, which is contiguous to Bond's lot, one suspects that Bond's new project is designed to cause maximum harm to the CRA project by constructing a gigantic, ugly project right in the heart of the CRA project – which had rejected Bond's bid.

When one looks at the nature and extent of Eastwood Coalition's Woonerf proposal, which needs compatible development on Bond lot, one suspects that Bond's new project is designed to trash the Woonerf proposal; Eastwood had oppose the Whole Foods mega-store.

When Bond Capital's track record in this area is reviewed, one sees a developer who has shown no regard for the environment, no regard for the area residents, no regard for the on-going efforts to revitalize this area. In fact, it appears as if the project, to the extent one can decipher what it constitutes, is a **spite project** proposed in order to harm the environment and the surrounding developments. An EIR is supposed to take the larger picture and not review a project in isolation. The EIR should placed the proposed project into both a **geographical** and a **chronological** context. Depriving the neighborhood of 96,600 sq. feet of parks and plazas is an mean-spirited and unnecessary adverse environmental impact. Berkeley Keep Jets Over the Bay Committee v. Board of Port Com"rs (2001) 91 Cal.App.4th 1344

CONCLUSION

H.E.L.P strongly urges that the City favor a commercial development on this lot that is compatible with the environmental objectives of Eastwood's Woonerfs and that bolsters the CRA's \$200 million dollar redevelopment.

RECEIVED
JUN 06 2005

CITY PLANNING
DIVISION OF LAND



June 5, 2005

Nicholas Hendricks
Environmental Review Coordinator
Department of City Planning
Environmental Review Section
200 North Spring Street, Room 750
Los Angeles, California 90012

Re: Scoping comments in response to Notice of Preparation for Environmental Impact Report for the Hollywood/Garfield Mixed Use Project (EAF No. ENV-2004-3814-EIR)

Dear Mr. Hendricks:

The Eastwood Coalition appreciates the opportunity to provide scoping comments in response to the Notice of Preparation (NOP) for the above-referenced EIR. The Eastwood coalition is a neighborhood association representing the various people who live or work within the area generally bounded by Hollywood Boulevard on the south, Western Avenue on the east, Franklin Avenue on the north, and the 101 freeway on the west. The project site is within the area we represent. The Eastwood Coalition submitted scoping comments for the previous development proposal for a Whole Foods Market for this site. Because many of those comments apply to this project as well, we incorporate by reference our previous letter for comments which we have not restated here.

We are generally encouraged by the reformulation of the project from a mega-sized store to a mixed use development. We believe a mixed-use project has the potential to be a better fit with our neighborhood. Nonetheless, we are concerned that the project could bring lasting unmitigated impacts to the community if the needs and concerns of the neighborhood are not carefully considered in the project's design and execution. The following presents our comments on the project objectives, analysis of impacts and mitigation, and alternatives to be studied in the EIR.

PROJECT OBJECTIVES

Every EIR must articulate clear project objectives as a benchmark to compare the effects of the project against reasonable alternatives and mitigation measures. ("A

clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR... [14 Cal. Code Regs. § 15124 (b)].) After reviewing the NOP for the EIR, we feel the NOP is silent as to what is or are the objective/s for this project. Other than the project description to build a "mixed-use development consisting of 108 residential units and approximately 10,000 square feet of retail development," we found no guidelines or suggestions regarding the objectives that this project should be studied against.

Therefore, we suggest the following objectives are appropriate for this project, along with guidelines explaining our rationale.

1. Be consistent with the neighborhood, be compatible with the existing sizes and types of buildings, and further the objectives of "SNAP".

This neighborhood is one of Hollywood's oldest, home to some prime examples of the Arts and Crafts as well as Art Deco styles of architecture in the city. The proposed development should be designed and scaled to respect and complement our existing historic buildings, such as use of similar architectural elements, quality materials, and building massing that steps back while going up. Bond Development's nearby Sunset and Vine and Sunset at St. Andrews projects demonstrate use of inexpensive materials and generic, lackluster architecture that are wholly inappropriate for this site.

This site also lies within a Station Neighborhood Area Plan (SNAP) district. The proposed development should further the SNAP objectives, which strive to encourage an urban pedestrian village-like development.

2. Address needs of the immediate community.

Our neighborhood needs community gathering spots, park areas, and most importantly, parking. Currently, there are approximately one hundred fifty rental units on Garfield Place with no off-street parking available. Unfortunately, there are only approximately one hundred parking spaces available on the street. These numbers are similar for the next two residential streets as well, Gramercy Place and Wilton Place. The project should consider oversizing parking to provide additional monthly rental spaces for neighbors and hourly parking for the general public.

The proposed retail spaces should also be designed and configured to attract small-scale businesses that cater to needs of the immediate neighborhood, such as a small organic produce market, as opposed to large national chains that cater to far-flung clientele dependent on their cars. At least one of the

spaces should be configured for a family-style restaurant with ample outside café space.

The development should also include a community room that is available for use by the neighborhood generally.

3. Place no new demand on on-street parking.

Because our neighborhood is so dearth for parking, any acceptable development proposal must provide sufficient off-street parking for its residents, customers, and employees so as not to place any new demand on the limited parking on our community's streets.

4. Have no lasting unmitigated significant impacts.

Any acceptable development should not have any lasting unmitigated significant negative impacts on the community. Specifically, the development cannot result in an unacceptable increase in traffic on neighborhood streets or increase demand for parking in the neighborhood.

IMPACTS ASSESSMENT AND MITIGATION

Traffic and Parking

Increased traffic, along with the increased need for parking that the proposed project could bring into our community is of immense concern. Following are some detailed matters the EIR should consider in assessing the project's impacts on traffic and parking.

- Assure an accurate traffic count. No matter how the traffic test is administered, we're concerned that the results won't be accurate, for currently, residents of Garfield must drive up and down looking for a parking space. Therefore, the traffic counts need to consider the additional volume of traffic generated by residents circling the blocks in search of parking.
- Recognize that much of the traffic volume consists of large buses. Currently, MTA bus routes 207 and 357 use this block of Garfield Place as a turn-around. All totaled, there are 190 buses that make a trip of Garfield Place, everyday. While the Eastwood Coalition has been working with the MTA to consolidate bus lines to reduce these numbers, traffic from large buses will continue to place a huge demand on Garfield Place, far greater than would a

similar number of passenger cars. The traffic study must recognize this existing condition and the difference between buses and cars.

- Recognize that traffic is already at gridlock. This block of Garfield Place is only two lanes wide with parallel parking on both sides, and only .2 miles long. Often people double park, further restricting traffic flow. And everyday, traffic is already at gridlock at the Hollywood intersection.
- Use an accurate, reasonable worst-case estimate of project-generated traffic. In order to fully assess traffic impacts, we recommend the EIR use the highest, reasonable estimate of impacts.
- Fully consider the project's traffic impacts on Garfield Place. Although the development will be located on Hollywood Boulevard, only one block west of Western Avenue, it is naïve to assume all project-generated traffic will enter and exit via Hollywood Boulevard. We fear much of the project-generated traffic will travel down Garfield Place to avoid the Western/Hollywood intersection.
- Fully account for new truck traffic, including waiting time. Truck traffic to serve the retail space must be fully accounted for in the traffic analysis. The design should provide for truck deliveries from Hollywood Boulevard to avoid backing up Garfield Place with truck deliveries and turnarounds. Our concerns are for the residents of Garfield who would otherwise suffer this burden of added traffic congestion, pollution, and noise.
- Quantify the cumulative effects on traffic from adjacent projects. The CRA's Hollywood/Western redevelopment project will literally surround the proposed project and result in a tremendous increase in traffic in the community. Just across the Hollywood Freeway, construction is underway on the new 1875-seat Central L.A. High School #1. Construction is well underway on the mixed-use development across the block at St. Andrews Place and Hollywood Boulevard, the Sunset-Western mixed-use development, and several other smaller developments in the area. No doubt the City is aware of other new developments in the pipeline. The EIR must *quantify* the cumulative effects of these and other related projects on traffic.
- Fully consider increased demands for parking. The NOP states parking totaling approximately 185 spaces will be provided. But assuming two cars per residential unit ($2 \times 108 = 216$) and retail generally requiring about four spaces per 1000 square feet ($4 \times 10 = 40$), the project would likely generate a demand for about 256 parking spaces. Thus it appears the project could place

an additional demand for over 70 spaces on our neighborhood streets. There is no place else to park in our neighborhood. Where will these people park?

We believe the EIR could alleviate these potential traffic and parking problems by combining the following alternatives and mitigation measures.

- Consider a smaller development and include more parking spaces. This seems like an elementary solution and would ensure lessened impacts with respect to parking. While we recognize that SNAP places a cap on parking, this particular policy of SNAP is inappropriate for our neighborhood and this project. We suggest additional parking over and above the needs of the project be included both for monthly rental and hourly parking for use by the general public. This additional parking should be proportional to the additional parking being provided in the adjacent CRA redevelopment project.
- Orient retail and delivery entrances and exits from Hollywood Boulevard. Orient entrances and exits such that all retail-generated project traffic, including truck delivery traffic, is from Hollywood Boulevard. This would minimize the impact of project-generated traffic on Garfield Place.
- Widen Hollywood Boulevard and add a center turn lane. By widening Hollywood Boulevard for the length of the development (i.e., between Garfield Place and St. Andrews Place) a left-hand turn lane for Hollywood Boulevard's eastbound traffic onto Garfield Place could be provided with a left-signal turning light. There's currently no turn lane onto Garfield Place from Hollywood Boulevard. This turn lane would help eliminate backed-up traffic along Hollywood Boulevard.

Geology and Soils

According to the NOP, the development is proposed to include one level of subterranean parking. With the prior Whole Foods Market proposal, the community was led to believe subterranean parking was infeasible due to stability concerns. The EIR must address any geologic instability concerns to ensure that excavation both feasible and safe. In addition, the EIR should address the issue of hazardous materials that may exist in the excavated soil, including remediation and transport.

Air Quality

The health and safety of our neighbors from exposure to construction dust and fumes and long-term emissions from increased is of great concern.

We can suggest no alternative to mitigate air quality impacts other than considering a smaller-scale development.

Land Use/Housing

We ask that the EIR fully consider the consistency of the proposed project with the planning objectives and requirements of SNAP. We ask that mitigation measures and design features to promote the objectives of SNAP and a pedestrian-friendly village be incorporated into the project, including setbacks, landscape areas, and pedestrian-oriented plazas and open spaces.

We suggest that landscaped public areas be included in the project in setbacks of at least 20 feet on Hollywood Boulevard and at least 15 feet on Garfield Place. We also suggest that generous courtyards be included that open out onto the public streets. While these courtyards may not be public, by opening out they can give the appearance of additional open space and greenery the neighborhood sorely lacks.

The NOP is silent on whether the residential units will be rental or for-sale, and what if any component will be affordable. We believe that reasonably priced for-sale units would be most appropriate, as there are few opportunities for home ownership in the community. We believe that ownership of a home helps bring about ownership in the community and a stabilizing effect.

Aesthetics

We are concerned that the visual impact of the proposed project will not fit with the current aesthetics of the community, nor with the vision for the future of this community. If large and imposing, the project's presence could create a canyon effect on Garfield Place (considering its relationship to the already existing St. Francis Hotel.) And with insufficient set backs and inappropriate massing, the development could not only be an eyesore to the community, but disadvantageous to the new retailers and residents.

Beyond architectural character and compatibility with surrounding buildings, we believe that the development's aesthetics must fully take into consideration the human psyche. Ample landscaping, outdoor seating, and generous public and private openspace must be included to successfully integrate the project with the surrounding neighborhood and enhance pedestrian activity and interest.

The EIR must fully consider these aesthetic concerns in the context of our existing environment and consider how the project can incorporate significant

landscape areas and setbacks to soften the project's visual presence and encourage pedestrian use.

Noise

New project-generated noise project is also a major concern to the community, both from construction and long-term effects. Residential use surrounds the project site on three sides. Existing noise is already at unbearable levels for a residential area, and significant new noise sources are unacceptable.

We suggest the following mitigation measures to reduce noise impacts:

- Limit construction hours to between 8:00 a.m. and 6:00 p.m., and never on Sunday. When Bond Development demolished the bungalows, they started at 7:00 a.m. They were also there on Sunday mornings, continuing with demolition. This inconsideration to the neighborhood is unacceptable for construction of the proposed project, particularly when considering that construction will go on for months and months.
- Require sound barriers. Placing sound barrier mats around the perimeter of the construction site can greatly diminish construction noise, as well as shield the visual eyesore of a massive construction site.
- No delivery trucks on Garfield Place. By placing retail and delivery ingress and egress on Hollywood Boulevard, we believe noise impacts on the community from standing and backing delivery trucks could be eliminated.

Public Services

The availability of parking and safety go hand-in-hand. Limited on-street parking increases vacancies and results in default tenants, which equals an increase in crime. Since the project site was purchased by Bond Development, approximately 35 parking leases to the neighbors were terminated. This resulted in tenants relocating out of the neighborhood. There is an increase in vacancies on Garfield Place, which influences an economic downturn. Landlords have not been able to rent properties because of the lack of parking available. This tends to attract default tenants with lower income and brings with it a higher crime rate.

The solution to this concern is simple. Make sure the proposed development places no new demand on the community's limited available on-street parking.

June 6, 2005

Nicholas Hendricks
Department of City Planning
Environmental Review Section
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Re: Hollywood/Garfield Mixed Use Project
EAF No.: ENV-2004-3814-EIR

Dear Mr. Hendricks:

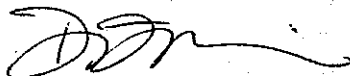
We are owner/user of 5620 Hollywood Boulevard. Our building is one half block west of 5553/5555 Hollywood Boulevard. We also own our home located .8 miles from our office in Los Feliz.

While we were very happy to see Whole Foods interested in the subject property, we feel quite the opposite about a mixed use development. These projects are low budget and destined to be future slums. The boulevard can barely handle the increase in traffic from the TWO developments of mixed use at Western and Hollywood. Much less when you add another project like this only one block away from Western and Hollywood Blvd.

This street would benefit from a Whole Foods, or another upscale business as this is a business street. Adding such dense residential projects is contrary to the aesthetics and needs of the area. There is thankfully some period architecture still left on these blocks. Please, let's not doom the neighborhood to decline.

Thank you for listening.

Sincerely,



D. Fincher



C. Chaffin

310/273-5464 & 323/957-9588 (PHONES)
310/274-7749 & 323/464-0135 (FAXES)

TO: Mr. Nicholas Hendricks, Environmental Review Coordinator
FAX #: 213/978-1343

RE: EAF: ENV-2004-3814-EIR
Government Code, § 6250 Request For Public Records

DATE: Thursday, July 14, 2005

NOTE

This fax consists of FIVE[5] pages including this cover page. If you do not receive all pages or experience trouble with the transmission, please call 310/273-4564.

Faxed herewith is my letter of this date, Thursday, July 14, 2005. NO copy follows via US mail

Wednesday, July 13, 2005

Mr. Nicholas Hendricks
 Environment Review Coordinator
 Department of City Planning
 Environment Review Section
 200 North Spring Street, Room 750
 Los Angeles, California 90012

At Fax #: 213/978-1343
 Not followed by US mail

RE: EAF: ENV-2004-3814-EIR
 PROJECT NAME: Hollywood/Garfield Mixed Use Project

Dear Mr. Hendricks:

I am writing to follow up on the prior comments on the above-referenced project. On May 27, 2005, the Second Appellate District issued the decision of Mejia v City of Los Angeles which supports the position that more than one person has made that this project's NOP was legally deficient.

In Mejia, the City's Planning Department adopted a mitigated negative declaration' despite the fact that additional factors had been brought to the City's attention.

¹A negative declaration is a written statement that briefly explains why a project will not have a significant environmental impact and therefore will not require an EIR. (Pub. Resources Code, § 21064.)

The philosophy of Mejia is that the City cannot evade an EIR by issuing a "mitigated negative declaration" when a "fair argument" raises bona fide issues which need to be addressed during the EIR process. Mejia p 22 Similarly, the City cannot simply delete several categories of "Environmental Factors Potentially Affected" when conducting an EIR. Such reasoning would allow an end-run around Mejia. The City could then agree to do on EIR on one or two issues and omitted all the other environmental issues despite the "fair argument" raised by the citizens. In fact, appears to be what the NOP is attempting to do.

Nor may the City rely on the lack of a "threshold of significance" to evade an EIR or to improperly limit the scope of an EIR.

A public agency cannot apply a threshold of significance or regulatory standard "in a way that forecloses the consideration of any other substantial evidence showing there may be a significant effect." (*Communities for a Better Environment, supra*, at p. 114.) Mejia at 26

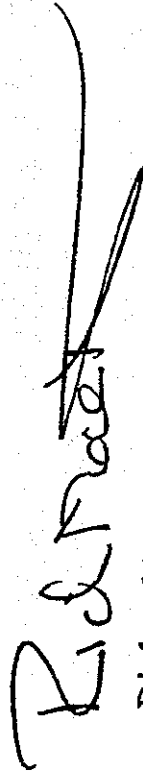
It would be a waste of everyone's money if the City were to proceed on the basis of this defective NOP, thereby throwing this project into the courts. I believe that Mejia started in 1999, and it is still in the courts six year later because the City evaded, rather than fully implemented, the EIR process.

Because the Bond Company still refuses to meet with any local group, the citizens are in the dark about what Bond proposes.

There is a rumor that Bond Company has, however, provided the City with additional plans for this project. I do not know if this is true, but I remind you that no plans at all were produced in response to my Government Code, § 6250 Request For Public Records. If the City is now reviewing anything new from Bond Company, the City cannot consider those additional submissions in secret. The EIR process cannot be conducted in the back rooms of City Hall using materials that have been intentionally withheld from the public.

The basic fact remains: Bond Company refuses to tell anyone in the community sufficient information about the project for there to be a legal NOP.

Very truly yours,



Richard MacNaughton

RMN:ra

cc: City Attorney

1916:500GR:BOND EIR #2:BEIR-1011

310/274-7749 & 323/464-0135 (FAXES)

TO: Mr. Nicholas Hendricks, Environmental Review Coordinator
FAX #: 213/978-1343

RE: EAF: ENV-2004-3814-EIR

DATE: Monday, August 8, 2005

NOTE

This fax consists of THREE [3] pages including this cover page. If you do not receive all pages or experience trouble with the transmission, please call 310/273-5464.

Faxed herewith and followed by US mail is a copy of my letter of this date, Monday, August 8, 2005.

Monday, August 8, 2005

Mr. Nicholas Hendricks
Environment Review Coordinator
Department of City Planning
Environment Review Section
200 North Spring Street, Room 750
Los Angeles, California 90012

At fax#: 213/978-1343
followed by US mail

RE: EAF: **ENV-2004-3814-EIR**
PROJECT NAME: Hollywood/Garfield Mixed Use Project

Dear Mr. Hendricks:

Thank you for your comprehensive letter of July 15, 2005.

Hopefully, our different interpretations of the requirements for the NOP will become moot. I am confident that an EIR that includes all the pertinent factors can provide a satisfactory basis for a complete evaluation of all the impacts that this site would have on the environment.

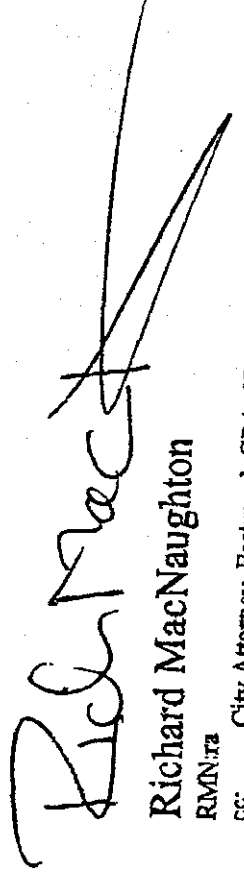
I am now Eastwood Coalition's representative on the CRA Hollywood-Western selection committee, and on July 30, 2005, we had a meeting concerning the design of the northside project. Eastwood feels very strongly that the property subject to this EIR must be evaluated as to the possible negative effects it may have on the CRA development vis a vis the possible positive effects it could have on the CRA project. The CRA is investing too much money into the Hollywood-Western project for the City not to examine the deleterious and/or beneficial effects of the

Similarly, Eastwood believes that the negative and positive effects on its Gramercy-Garfield Woonerf project must be evaluated. The woonerf project affects the physical and mental health of the residents along Garfield and Gramercy, especially the children and the elderly, and thus, we trust that the EIR will set the frame work for the evaluation of these relevant community health issues. As explained in our prior submission, this lot plays a crucial role in the Woonerf project.

As you are no doubt aware, SNAP expressly endorses woonerven within its area and the entire Gramercy-Garfield area including 100% of the lot under consideration falls with the SNAP district. Any development that negatively or positively affects a legislatively authorized community project should definitely be included in the EIR.

We look forward to working with the City to make certain that this lot is developed in the manner that is best for the citizens, the CRA, the City, future generations, and for the developer.

Very truly yours,



Richard MacNaughton

RMN:ra

cc: City Attorney, Eastwood, CRA, HUNC
1916:500GR:BOND EIR #2:BEIR-2013

