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January 19, 2021

LETTER TO FILE:

ENV-2019-5735-SCEA

Response to Comments

The City of Los Angeles (City) prepared a Sustainable Communities Environmental Assessment (SCEA) dated November 12, 2020 for the Belmont Village Senior Living Westwood II Project.

The proposed Project involves construction of a new 12-story, 176,580-square foot Eldercare Facility containing up to 53 Senior Independent Housing dwelling units, 77 Assisted Living Care Housing guest rooms, 46 Alzheimer's/Dementia Care Housing guest rooms, and associated residential amenity and service areas within a single building located at 10822 Wilshire Boulevard. In addition, the Eldercare Facility would provide a new 2,520- square foot Fellowship Hall on the ground level fronting Wilshire Boulevard for use by the Church, and 2,923 square feet of shared space. The Project would also construct a new two-story, 19,703-square foot Childcare Facility containing 10,238 square feet of classroom, administrative office space, and multipurpose/group space and 1,845 square feet of church-related administrative offices within a single building located at 10812 Ashton Avenue. A minimum of 184 parking spaces would be provided on the ground floor level adjacent to the Childcare Facility and within a three-level subterranean parking garage. The Project would also provide up to 27 short-term and 43 long-term bicycle parking spaces. To allow for construction of the Project, the Church's existing preschool, Fellowship Hall, administrative offices, and surface parking lot located at 10822 Wilshire Boulevard, and a Church-owned single-family residence located at 10812 Ashton Avenue would be demolished. The Church's existing Sanctuary located on the northern portion of the Project Site fronting Wilshire Boulevard would remain. Approval of a haul route would be required for the export of approximately 62,000 cubic yards of earth materials.

The SCEA was released for public comment from November 12, 2020 to December 14, 2020. A public hearing before the City Council's Planning and Land Use Management Committee is scheduled for March 2, 2021.

PUBLIC COMMENTS

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

1. California Department of Transportation (Caltrans) dated December 1, 2020
2. Doralyn and Malcolm Harris, dated November 17, 2020
3. Brian Barr, dated November 30, 2020
4. Christina Luttrull, dated December 1, 2020

5. Dana Goodman, dated November 18, 2020
6. Dana Zinderman, dated November 30, 2020
7. Diane Forester, dated November 18, 2020
8. Nan Blum, dated December 1, 2020
9. Randall Greer, dated November 19, 2020
10. Richard Marantz, dated December 1, 2020
11. Roya Tabibian, dated November 17, 2020
12. Sahar Manavi, dated December 1, 2020
13. Trena Greitzer, dated November 19, 2020
14. Alfred Chan, dated December 5, 2020
15. Barbara Herman, dated December 1, 2020
16. Brian Kluft, dated November 17, 2020
17. Bryan Hsiao, dated December 3, 2020
18. Caron Schwartz, dated December 13, 2020
19. Cynthia Finerman, dated December 9, 2020
20. Dale Pincourt, dated December 1, 2020
21. Debra Kanoff, dated December 13, 2020
22. Eileen Kravetz, dated December 4, 2020
23. Jim Pacpal, dated December 6, 2020
24. Jonathan Balisteri, dated December 9, 2020
25. Karen Wurtzel, dated December 14, 2020
26. Kay Waldman, dated December 11, 2020
27. Liz Laud, dated December 13, 2020
28. Rob Glushon, dated December 14, 2020
29. Sander Romick, dated December 7, 2020
30. Shawn Goodman, dated December 4, 2020
31. Sondra Vazirani, dated November 18, 2020
32. Susanne Goldstein, dated December 1, 2020
33. Thomas Barad, dated December 14, 2020
34. Vicki Schiller, dated November 17, 2020

The following provides the City's responses to each of the written comments received for the SCEA. Copies of the written comments in their entirety can be found in the administrative record of Case No. ENV-2019-5735-SCEA and as part of Attachment B of this letter.

Inquiries regarding the SCEA shall be directed to Robert Keatinge of the Department of City Planning at (213) 847-3677 or robert.keatinge@lacity.org.

RESPONSE TO COMMENTS

BELMONT VILLAGE SENIOR LIVING WESTWOOD II PROJECT 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 Belmont Village Senior Living Westwood II Project (Project). All comment letters are included as Attachment B. All individual comments have been delineated, numbered, and included, below. Responses to individual comments have also been provided.

AGENCY COMMENTS

California Department of Transportation (Caltrans) Letter

District 7 – Office of Regional Planning
100 S. Main Street, Suite 100
Los Angeles, CA 90012

Caltrans Comment 1

The commenter summarizes the project description, acknowledges and supports the project as an infill project near transit service. The commenter states that the project is designed in a way that induces demand for additional vehicle trips and that the demand should be addressed with appropriate design and management principles to reduce vehicle miles traveled, such as implementing Transportation Demand Management measures as an alternative to requiring car parking.

Response to Caltrans Comment 1

In accordance with LAMC Section 12.21 A.16, the Project would include 27 short-term and 43 long-term bicycle parking spaces. As discussed in Section 3, *SCEA Criteria*, of the SCEA, the Project Site is located less than one-quarter mile (approximately 900 feet) from the intersection of Wilshire and Westwood Boulevards, which is served by at least two major bus lines and this intersection would be served by the Westwood/UCLA Station of Metro's Purple Line Extension, which is anticipated to be operational in 2027. The Project is designed to provide alternative, non-vehicular transportation methods in a location that is well-served by existing and future transit infrastructure, as reflected by the Project Site's designation as being located in both a Transit Priority Area as well as a High-Quality Transit Area. The Project would minimize impacts on the existing roadway system by placing new senior housing as well as neighborhood-serving institutional uses near transit, and by providing bicycle parking and pedestrian infrastructure to incentivize increased biking and walking. Moreover, due to its proximity to numerous existing bus lines as well as future rail service, the Project also encourages increased rail and bus usage. Finally, as set forth in the assessment of vehicle miles traveled (VMT) prepared by Linscott, Law & Greenspan, Engineers (LLG) and approved by the City's Department of Transportation (LADOT) (included as

Appendices K-3 and K-4 of the SCEA), the Project would not exceed LADOT's thresholds for either Household or Work VMT.

Caltrans Comment 2

The commenter states that if underground parking must be built, it should be designed in a way that is conducive to adaptive reuse, and should contain flat floors with ramps on the exterior edge, so that they can be more easily converted to more beneficial uses in the future.

Response to Caltrans Comment 2

The subterranean parking garage is currently designed with flat floors and the vehicular access ramps are located on the interior eastern edge of the subterranean parking structure.

Caltrans Comment 3

The commenter states that any transportation of heavy construction equipment and/or materials, which requires use of oversized-transport vehicles on State highways, will require a Caltrans transportation permit. In addition, the commenter states that large size truck trips should be limited to off-peak commute periods.

Response to Caltrans Comment 3

The commenter is correct that necessary permits from Caltrans would be obtained if oversized-transport vehicles are required for project construction. As discussed in Section 2, Subsection 2.6, of the SCEA, all hauling would occur between the hours of 9:00 a.m. and 3:00 p.m., Monday through Saturday, which are off-peak commute periods.

COMMUNITY COMMENTS

Harris Comment Letter

Harris Comment 1

The commenter states objection to the project, stating the project will increase traffic and open other opportunities for similar projects in the area.

Response to Harris Comment 1

The comments provided by the commenter do not point to specific inaccuracies or deficiencies in the transportation analysis presented in the SCEA to which a direct response is possible. As discussed in Section 4, Subsection 4.17, *Transportation*, of the SCEA, a Transportation Impact Study (TIS) was prepared by LLG Engineers in March 2019. This study evaluated traffic associated with Project operation, including but not limited to, levels of service, site access, circulation, operational plan, hazards, etc., pursuant to LADOT's Transportation Impact Study Guidelines. As discussed in the TIS, the Project would generate 41 net new weekday AM peak hour trips and 49 net new weekday PM peak hour vehicle trips and no significant transportation impacts have been identified. On April 23, 2019, the Los Angeles Department of Transportation (LADOT) issued its assessment letter approving the TIS. A Construction Traffic Analysis Memo was also prepared by LLG Engineers in March 2019, which is included as Appendix K-2 of the SCEA. Subsequently, following the City's adoption of new transportation thresholds pertaining to VMT, LLG prepared a VMT assessment for the project which concluded that no VMT-related impacts would result, and this assessment was also approved by LADOT.

In response to the repeated comments received regarding the Project's alleged traffic impacts, LLG has prepared a brief Traffic Summary Memorandum dated January 15, 2020 (LLG Memorandum) that briefly summarizes the conclusions of the Project's approved transportation assessments. The LLG Memorandum is attached as Attachment A and where possible, specific responses pertaining to the commenter's concerns are summarized below.

Project Trip Generation

As discussed in the LLG Memorandum, the overall project is forecast to result in 41 net new weekday AM peak hour trips and 49 net new weekday PM peak hour vehicle trips (i.e., less than one vehicle per minute during the commuter peak hours). The following points are provided with respect to the trip generation forecast:

- The small increase in pre-school square footage (849 square feet) is expected to result in five (5) net new inbound and five (5) net new outbound vehicle trips during the weekday morning (AM) peak hour, and only six (6) net new inbound and six (6) net new outbound vehicle trips during the weekday afternoon (PM) peak hour.
- The pre-school traffic generation exists today (pre-Covid-19 pandemic) and is experienced on weekdays only. As with any school/day care, this traffic generation is short in duration and occurs twice a day with drop-off and pickup activity.
- No changes in traffic volumes are expected with the Westwood Presbyterian Church.

- The low level of trip generation associated with the senior living component reflects documented trends of low resident vehicle ownership as the majority of residents do not own/operate personal vehicles. Residents typically utilize the Belmont Village shuttle service, which will be provided for residents for medical, dental, and other appointments as well as shopping and recreational activities. Concierge service will also be provided on-site to arrange other transportation needs/services.

Overview of Westwood Presbyterian Church Traffic Circulation

The Westwood Presbyterian Church's inbound and outbound traffic circulation is shown on page CIRC-1 in Attachment A). The Church has been in operation since 1947 and would maintain the current access scheme from/to Wilshire Boulevard and Ashton Avenue. Three (3) drop-off/pick-up zones would be provided for church patrons; 1) via an approximately 200-foot-long internal drive aisle, 2) within the new subterranean parking structure, and 3) via a new, secondary off-street drop-off/pick-up zone along the Wilshire Boulevard frontage (with a by-pass lane). A dedicated church elevator would be provided inside the parking structure to transport church patrons to/from the church lobby.

Overview of Childcare Facility's Traffic Circulation

The Childcare Facility's inbound and outbound traffic circulation pattern is shown on page CIRC-2 in Attachment A.

- The existing pre-school has been in operation for over 50 years and the project would generate a nominal increase in trip generation (five (5) net new inbound and five (5) net new outbound vehicle trips during the weekday morning (AM) peak hour and six (6) net new inbound and six (6) net new outbound vehicle trips during the weekday afternoon (PM) peak hour).
- All inbound access would occur via Ashton Avenue and outbound access would occur via both Wilshire Boulevard and Ashton Avenue, as occurs today.
- Parents/guardians entering Ashton Avenue would be able to drop-off/pick-up pre-school student either adjacent to the school or within the parking structure.
- Fifteen (15)-minute loading spaces would be provided inside the parking structure outside of dedicated staff parking (Levels P1 – P3) for use during the weekday morning drop-off and afternoon pick-up time periods.
- A dedicated pre-school elevator would be provided at the southwest corner of the parking structure and would provide direct access to the school.

Overview of Eldercare Facility Traffic Circulation

The Eldercare Facility's inbound and outbound traffic circulation pattern is shown on page CIRC-3 in Attachment A.

- Future Belmont Village staff, visitors, and residents that own and bring a vehicle to the site would access the site only via Wilshire Boulevard (i.e., access to/from Ashton Avenue will not be authorized).

- Three (3) drop-off zones will be provided for the Eldercare Facility; 1) via an approximately 200-foot-long internal drive aisle, 2) inside the new subterranean parking structure, or 3) via a new, secondary off-street drop-off/pick-up zone along the Wilshire Boulevard frontage (with a by-pass lane) which is planned to also provide valet service.
- An elevator dedicated to the Eldercare Facility users is planned near the building's central core and would transport users between the main lobby and the subterranean parking levels.
- Any valet vehicle pick-up is planned to occur via the northbound drive aisle, south of Wilshire Boulevard.
- Appropriate signage would be posted to direct all Belmont Village users to enter and exit the site only via Wilshire Boulevard.

As discussed in the LLG Memorandum, LADOT previously reviewed and approved the above summarized site access and circulation schemes for purposes of assessing potential traffic impacts on the surrounding street system and at the specific study intersections outlined in the approved memorandum of understanding. Final LADOT clearance requires review of the specific design of the site access, driveways, and internal circulation when more detailed building construction plans become available. Project design is required to comply with all applicable City standards and guidelines pertaining to the specific driveway widths and design, internal drive aisle widths, vehicle queuing/stacking areas and lengths, parking space dimensions, among others.

The City of Los Angeles requires environmental review for development projects in the City. If additional projects are proposed in the area, the City will require separate environmental review under CEQA.

Barr Comment Letter

Barr Comment 1

The commenter states objection to the project, noting general concerns regarding building height and increased traffic and noise in the area.

Response to Barr Comment 1

The comments provided by the commenter do not point to specific inaccuracies or deficiencies in the transportation or noise analyses presented in the SCEA to which a direct response is possible. As discussed in Section 4, Subsection 4.1, *Aesthetics*, of the SCEA, the Specific Plan's allowance of an FAR of up to 8:1 has historically facilitated the construction of numerous residential high-rise buildings of 20 stories or higher along Wilshire Boulevard. Measured from lowest grade to the top of its uppermost penthouse structure, the 12-story Eldercare Facility is 153 feet in height. In connection with the Project's requested Eldercare Facility Unified Permit, the Applicant is requesting approval of the proposed height. As proposed, the 12-story Eldercare Facility would be consistent with the existing high-rise residential buildings that characterize Wilshire Boulevard under the Specific Plan. The 176,580 square foot Eldercare Facility would have an FAR of 5.45:1.

Please refer to Response to Harris Comment 1 as well as the LLG Memorandum regarding traffic. As discussed in Section 4, Subsection 13, *Noise* and Section 4, Subsection 17, *Transportation*, of the SCEA, no significant impacts related to noise or traffic have been identified.

Luttrull Comment Letter

Luttrull Comment 1

The commenter states objection to the project, indicating that the project will cause congestion issues along Wilshire Boulevard and Ashton Avenue.

Response to Luttrull Comment 1

Please refer to Response to Harris Comment 1 and the LLG Memorandum regarding traffic and congestion.

Goodman Comment Letter

Goodman Comment 1

The commenter states objection to the project, noting a general concern regarding the project's proposed density.

Response to Goodman Comment 1

The comments provided by the commenter do not point to specific inaccuracies or deficiencies in analysis presented in the SCEA to which a direct response is possible. As discussed in Section 3, Subsection 3.2, *Transit Priority Project Criteria*, of the SCEA, the Project and the Project Site are consistent with SCAG's current forecasted development pattern for the region, including the general use designation, density, building intensity, and applicable policies specified for the area. Please refer to Response to Barr Comment 1 regarding building height and FAR.

Zinderman Comment Letter

Zinderman Comment 1

The commenter states objection to the project and a concern regarding use of Ashton Avenue for access.

Response to Zinderman Comment 1

Please refer to Response to Harris Comment 1 regarding site access and congestion.

Zinderman Comment 2

The commenter states a concern regarding parking, including alleged parking overflow effects.

Response to Zinderman Comment 2

As discussed in Section 2, Subsection 2.6, *Project Characteristics*, of the SCEA, in connection with the requested Eldercare Facility Unified Permit, the Applicant is requesting a determination to allow the Eldercare Facility to utilize the LAMC's vehicular parking provisions for Eldercare Facilities in lieu of the Wilshire-Westwood Scenic Corridor Specific Plan's parking standards. As discussed, the Project would be required to provide a total of 184 vehicular parking spaces and the Project would provide a minimum of 184 spaces located on the ground level adjacent to the Childcare Facility and within the three-level subterranean parking garage below the Eldercare Facility. Although PRC Section 21099 provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment", the Project provides parking in compliance with LAMC requirements.

Zinderman Comment 3

The commenter states a concern about proposed building orientation/layout on-site and states that the neighborhood would drastically change should the Project be built.

Response to Zinderman Comment 3

The comments provided by the commenter do not point to specific inaccuracies or deficiencies in analysis presented in the SCEA or pertain to the potential environmental impacts of the proposed Project. Please refer to Response to Barr Comment 1 regarding surrounding development.

Forester Comment Letter

Forester Comment 1

The commenter states objection to the Project and states the project would result in additional traffic that will be a problem in the area.

Response to Forester Comment 1

Please refer to Response to Harris Comment 1 regarding transportation impacts.

Forester Comment 2

The commenter states that the Project would block views of the adjacent building facing west and block all sunlight in those units.

Response to Forester Comment 2

As discussed in Section 4, Subsection 4.11, *Land Use and Planning*, of the SCEA, the proposed Eldercare Facility complies with the shadow-related provisions of Section 12 of the Wilshire-Westwood Scenic Corridor Specific Plan. This compliance is demonstrated by a project-specific shade and shadow study included as Appendix C of the SCEA. As discussed in Section 4.0,

Section 4.1, *Aesthetics*, of the SCEA, the Project would not result in any aesthetics-related impacts, including those pertaining to established scenic vistas/views or shade/shadows.

Blum Comment Letter

Blum Comment 1

The commenter asks the City to reconsider the process for evaluating the Belmont project, states that the SCEA is inadequate given the Project's, scope, location and unwanted impacts on the neighborhood, and that an EIR should be required due to traffic impacts.

Response to Blum Comment 1

The comments provided by the commenter do not point to specific inaccuracies or deficiencies in the analysis presented in the SCEA to which a direct response is possible. As discussed in Section 4, Sections 4.1 through 4.21, of the SCEA, all environmental impacts associated with implementation of the Project have been determined to be less than significant or less than significant with mitigation. Since there are no potentially significant impacts that cannot be mitigated or new information presented that has the potential to result in new or increased significant environmental impacts, preparation of an EIR is not warranted.

Blum Comment 2

The commenter states concerns about increased traffic, congestion and use of Wilshire Boulevard and Ashton Avenue for access.

Response to Blum Comment 2

Please refer to Response to Harris Comment 1 regarding traffic, site access, and congestion.

Greer Comment Letter

Greer Comment 1

The commenter states objection to the Project as proposed, due to its conflict with the Wilshire-Westwood Specific Plan, zoning requirements, and incompatible design. In addition, the commenter states that the Project would set a bad precedent for future projects.

Response to Greer Comment 1

Section 4, Subsection 4.11, *Land Use and Planning*, of the SCEA, provides a discussion of the Project's consistency with the requirements and policies of the Westwood Community Plan, the LAMC (including the City's Eldercare Ordinance), and the Wilshire-Westwood Scenic Corridor Specific Plan, to the extent that various goals, objectives, and policies of these plans have been adopted for the purpose of avoiding or mitigating an environmental effect. The Project would not conflict with requirements and policies of the LAMC or Wilshire-Westwood Community Plan and impacts would be less than significant.

Please refer to Response to Harris Comment 1 regarding environmental review for future development projects.

Marantz Comment Letter

Marantz Comment 1

The commenter states objection to the Project and states a concern regarding site access and congestion

Response to Marantz Comment 1

Please refer to Response to Harris Comment 1 regarding site access and congestion.

Tabibian Comment Letter

Tabibian Comment 1

The commenter states objection to the Project and states that a noise study should be prepared discussing operational noise from the Childcare Facility and that non-COVID traffic analysis should be prepared. In addition, the commenter states a concern regarding privacy.

Response to Tabibian Comment 1

The Project's potential noise impacts are discussed in Section 4, Subsection 4.13, *Noise*, of the SCEA, which are based on a Noise and Vibration Technical Report prepared by DKA Planning in May 2020 and included as Appendix J of the SCEA. This noise report includes discussions of the environmental setting, fundamentals of noise and vibration, regulatory framework, methodology, and impacts (including operational noise from the Childcare Facility). Potential noise impacts associated with operation of the Childcare Facility were determined to be less than significant. Please refer to Response to Harris Comment 1 regarding traffic impacts and preparation of a transportation study. The commenter's concern regarding privacy are noted; however, impacts related to personal privacy are not discussed in the SCEA because privacy is not an environmental issue under CEQA.

Manavi Comment Letter

Manavi Comment 1

The commenter states support for additional housing, states that the Project is too massive and states a concern about congestion and site access.

Response to Manavi Comment 1

Please refer to Response to Barr Comment 1 regarding building size and surrounding developments and Response to Harris Comment 1 regarding site access and congestion.

Greitzer Comment Letter

Greitzer Comment 1

The commenter states that the Project does not adhere to the zoning regulations, would set a precedent for future projects on Wilshire, and states a concern regarding congestion and site access.

Response to Greitzer Comment 1

Please refer to Response to Greer Comment 1 regarding zoning consistency, and Response to Harris Comment 1 regarding site access, congestion, and future development projects.

Chan Comment Letter

Chan Comment 1

The commenter states that the Project would subject future residents to air pollutants and noise.

Response to Chan Comment 1

The comments provided by the commenter do not point to specific inaccuracies or deficiencies in the analysis presented in the SCEA to which a direct response is possible. As discussed in Section 4, Subsection 4.3, *Air Quality*, of the SCEA, an Air Quality and Greenhouse Gas Report (AQ/GHG Report), was prepared by Rincon Consultants dated June 2020 and included as Appendix D of the SCEA and air quality impacts were determined to be less than significant. Please refer to Response to Tabibian Comment 1 regarding noise impacts.

Herman Comment Letter

Herman Comment 1

The commenter states objection to the Project and states a general concern about increased traffic, noise and congestion.

Response to Herman Comment 1

Please refer to Response to Harris Comment 1 regarding traffic, site access, and congestion, and Response to Tabibian Comment 1 regarding noise impacts.

Kluft Comment Letter

Kluft Comment 1

The commenter states support for the Project and that the City should revisit the six-story moratorium on the Wilshire corridor.

Response to Kluff Comment 1

The commenter's support for the Project and comments regarding height limits on Wilshire corridor are noted by the City of Los Angeles Planning Department.

Hsaio Comment Letter

Hsaio Comment 1

The commenter states support for the Project. The commenter also states a concern about site access and congestion.

Response to Hsaio Comment 1

The commenter's support for the Project is noted. Please refer to Response to Harris Comment 1 regarding site access and congestion.

Schwartz Comment Letter

Schwartz Comment 1

The commenter states objection to the Project and states concerns regarding increased traffic, blocked views in the area, and excessive building heights.

Response to Schwartz Comment 1

Please refer to Response to Harris Comment 1 regarding traffic, Response to Forester Comment 2 regarding views, and Response to Barr Comment 1 regarding building height.

Finerman Comment Letter

Finerman Comment 1

The commenter states concerns about increased traffic in the area, that insufficient study has been provided during both construction and operation, and that an EIR should be prepared.

Response to Finerman Comment 1

Please refer to Response to Harris Comment 1 regarding traffic. Potential transportation impacts during both construction and operation of the proposed Project have been analyzed in Section 4, Subsection 17, *Transportation*, of the SCEA. Other environmental impacts during construction and operation of the Project with respect to traffic (i.e. air quality and noise) have been discussed in their respective sections. Since there are no potentially significant impacts that cannot be mitigated or new information presented which has the potential to result in new or increased significant environmental impacts, preparation of an EIR is not warranted.

Pincourt Comment Letter

Pincourt Comment 1

The commenter states objection to the Project and states concerns about increased size, scale, and density of the Project and increased traffic in the area.

Response to Pincourt Comment 1

Please refer to Response to Goodman Comment 1 regarding density and Response to Harris Comment 1 regarding traffic.

Kanoff Comment Letter

Kanoff Comment 1

The commenter states objection to the Project and concerns about site access and congestion.

Response to Kanoff Comment 1

Please refer to Response to Harris 1 regarding site access and congestion.

Kravetz Comment Letter

Kravetz Comment 1

The commenter states that they live next to another senior living facility operated by the applicant and the facility is loud.

Response to Kravetz Comment 1

The comments provided by the commenter do not pertain to the proposed Project and do not point to specific inaccuracies or deficiencies in the analysis presented in the SCEA to which a direct response is possible. Please refer to Response to Tabibian Comment 1 regarding the noise analysis prepared for the proposed project.

Pacpal Comment Letter

Pacpal Comment 1

The commenter states objection to the Project and concerns about increased congestion, site access and circulation. In addition, the commenter states that a complete environmental impact study should be prepared with realistic research and numbers.

Response to Pacpal Comment 1

Please refer to Response to Harris Comment 1 regarding site access, congestion, and transportation studies prepared for the Project. The comments regarding utilizing different research and numbers do not point to evidence contradicting or suggest specific inaccuracies or deficiencies in the analysis presented in the SCEA to which a direct response is possible. Please refer to Response to Finerman Comment 1 regarding preparation of an EIR.

Balisteri Comment Letter

Balisteri Comment 1

The commenter states a concern regarding increased traffic in the area and that an environmental impact report should be prepared. In addition, the commenter states concerns about increased noise and building heights.

Response to Balisteri Comment 1

Please refer to Response to Finerman Comment 1 regarding traffic and preparation of an EIR, Response to Tabibian regarding noise, and Response to Barr Comment 1 regarding building height.

Wurtzel Comment Letter

Wurtzel Comment 1

The commenter states concerns about increased traffic in the area, site access and congestion, and that an EIR should be prepared.

Response to Wurtzel Comment 1

Please refer to Response to Harris Comment 1 and Response to Finerman Comment 1 regarding traffic, site access, congestion and preparation of an EIR.

Waldman Comment Letter

Waldman Comment 1

The commenter states concerns about site access, circulation and Project density, and notes that the City is substituting a SCEA with preparation of an EIR.

Response to Waldman Comment 1

Please refer to Response to Harris Comment 1 regarding site access and congestion, Response to Goodman Comment 1 regarding density, and Response to Finerman Comment 1 regarding traffic and preparation of an EIR.

Laud Comment Letter

Laud Comment 1

The commenter states objection to the Project due to increased building height, noise and traffic. The commenter also states that an environmental study should be prepared.

Response to Laud Comment 1

Please refer to Response to Barr Comment 1 regarding building height and Response to Tabibian regarding noise. Please refer to Response to Harris Comment 1 and Response to Finerman Comment 1 regarding traffic and preparation of an EIR.

Glushon Comment Letter

Glushon Comment 1

The commenter states that the SCEA fails to consider all pertinent information regarding potential air quality impacts and that it should have made a “good faith and reasonable disclosure” of the cumulative impacts prior to approval.

Response to Glushon Comment 1

The comments provided by the commenter do not point to specific evidence contradicting or point to inaccuracies or deficiencies in the analysis presented in the SCEA to which a direct response is possible. The commenter cites a California Court of Appeal case involving a project located in the Southern California Air Basin that was determined to result in project-level air quality impacts. As discussed in Section 4, Subsection 4.3, *Air Quality*, of the SCEA, pursuant to SCAQMD guidance, individual projects that exceed SCAQMD’s recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. In the cited court case, the lead agency accordingly determined that the project would result in a cumulative air quality impact, but did not attempt to quantify this impact. The court found that this failure to make a good-faith effort to quantify the extent of the cumulative impact rendered the analysis inadequate. However, this case is completely inapposite, for as discussed in Section 4, Subsection 4.3, *Air Quality*, of the SCEA, an Air Quality and Greenhouse Gas Report, was prepared by Rincon Consultants dated June 2020 and included as Appendix D of the SCEA. This report utilized all applicable guidance and methodology to quantify the Project’s regional and local emissions. As concluded by the Air Quality and Greenhouse Gas Report and the SCEA, all Project emissions would be below SCAQMD’s recommended daily thresholds and accordingly, Project-level regional and local air quality impacts were determined to be less than significant. Therefore, pursuant to SCAQMD guidance, the Project’s contribution to cumulative air quality impacts would not be cumulatively considerable and less than significant.

Glushon Comment 2

The commenter states that CEQA requires analysis of whether the Project would cause a substantial adverse change in the significance of a historical resource. The commenter states that

due to the proximity of the Project to the cemetery, the potential exists for both indirect and direct impacts to occur.

Response to Glushon Comment 2

The comments provided by the commenter do not point to specific evidence contradicting or point to inaccuracies or deficiencies in the analysis presented in the SCEA with respect to the Project's indirect and direct impacts to historical resources. As discussed in detail in Section 4, Subsection 4.5, *Cultural Resources*, of the SCEA and in the Historic Resource Assessment prepared for the Project (Appendix E of the SCEA), the area surrounding the cemetery is already extensively developed with high- and mid-rise residential and commercial structures, the proposed Project would not introduce any incompatible visual elements that would result in any negative indirect effect to the resource's setting, or have any other effect that could affect the cemetery's eligibility for designation as a historic resource. In addition, as discussed in Section 4, Subsection 4.13, *Noise*, Project-level mitigation measures are required to reduce vibration noise and ensure that historic buildings on and adjacent to the Project Site are not damaged during construction. Mitigation Measures N-8 through N-10 ensure that construction activities that produce vibration are sequenced, pre-construction surveys are conducted, and that any potentially significant building damage is mitigated and addressed in real time through vibration monitoring techniques. With implementation of Project-level mitigation measures, vibration related noise impacts would be less than significant.

Glushon Comment 3

The commenter states that further analysis is required for potential geology and soils impacts.

Response to Glushon Comment 3

The comments provided by the commenter do not point to specific evidence contradicting or inaccuracies or deficiencies in the analysis presented in the SCEA which can be directly responded to. As discussed in Section 4, Subsection 4.6, *Geology and Soils*, of the SCEA, the analysis in the SCEA is based, in part, on a site-specific Geotechnical Investigation prepared by Wood Environment and Infrastructure Solutions, Inc. dated May 6, 2016 and updated April 18, 2019. This report was approved by the Los Angeles Department of Building and Safety, Grading Division, as noted in a letter dated October 8, 2020 (LADBS Approval Letter). The Geotechnical Investigation and LADBS Approval Letter are included in Appendix F of the SCEA. As discussed in Section 4, Subsection 4.6, *Geology and Soils*, impacts would be less than significant.

Glushon Comment 4

The commenter states that further analysis is required for potential greenhouse gas emission impacts.

Response to Glushon Comment 4

The comments provided by the commenter do not point to specific evidence contradicting or point to inaccuracies or deficiencies in the analysis presented in the SCEA to which a direct response is possible. As discussed in Section 4, Subsection 4.8, *Greenhouse Gas Emissions*, of the SCEA, an Air Quality and Greenhouse Gas Report, dated June 2020, was prepared by Rincon

Consultants and included as Appendix D of the SCEA. Impacts were determined to be less than significant.

Glushon Comment 5

The commenter states that the Project Site is in a Methane Buffer Zone and that the SCEA fails to adequately consider and evaluate impacts.

Response to Glushon Comment 5

The comments provided by the commenter do not point to specific evidence contradicting or pointing to inaccuracies or deficiencies in the analysis presented in the SCEA to which a direct response is possible. As discussed in Section 4, Subsection 4.9, *Hazards and Hazardous Materials*, of the SCEA, the Project Site is identified as being located within a Methane Buffer Zone. Accordingly, in compliance with the City's existing methane regulations, prior to the issuance of a building permit, the Project Site would need to be independently analyzed by a qualified engineer, as defined in City Ordinance No. 175,790 and Section 91.7102 of the LAMC. The engineer would investigate and design a methane mitigation system in compliance with the LADBS Methane Mitigation Standards for the appropriate Project Site Design level which would prevent or retard potential methane gas seepage into the building. The engineer's design recommendation would be subject to LADBS, and Los Angeles Fire Department (LAFD) review and approval. During subsurface excavation activities, including borings, trenching and grading, OSHA worker safety measures would be implemented as required to preclude any exposure of workers to unsafe levels of soil gases, including, but not limited to, methane. Compliance with applicable laws and regulations during construction of the Project would address the aforementioned hazards and reduce the impact associated with the potential release of hazardous materials to a less than significant level.

Glushon Comment 6

The commenter states that the Project does not comply with the Wilshire-Westwood Scenic Corridor Specific Plan, including but limited to its height in excess of 6 stories.

Response to Glushon Comment 6

Please refer to Response to Greer Comment 1 regarding consistency with the Wilshire-Westwood Scenic Corridor Specific Plan and Response to Barr Comment 1 regarding building height.

Glushon Comment 7

The commenter states that the SCEA's conclusory finding of a "less than significant impact with mitigation incorporated," is not supported by evidence. The commenter states that particularly during construction, even with the proposed mitigation measures, there are likely to be significant noise impacts during grading and construction.

Response to Glushon Comment 7

The comments provided by the commenter do not point to inaccuracies or deficiencies in the analysis presented in the SCEA to which a direct response is possible. As discussed in Section

4, Subsection 4.13, *Noise*, of the SCEA, a Noise and Vibration Technical Report was prepared for the Project by DKA Planning in May 2020 and included as Appendix J of the SCEA. This report analyzed the noise levels resulting from the construction of the Project. As shown in Table 4-22 and Table 4-23 of the SCEA, with implementation of the identified Project-specific mitigation measures N-1 through N-7, ambient noise levels during construction of Phase I of the Project would increase no more than 4.6 dBA Leq and no more than 4.7 dBA Leq during construction of Phase II. These increases would be below the City's 5 dBA Leq threshold of significance. As such, construction noise impacts would be less than significant with mitigation.

Glushon Comment 8

The commenter states that there are presently inadequate public services for the Project Site, including but not limited to emergency responders such as paramedic, fire and police. In addition, the commenter states that with proposed severe budget cuts, further information and evaluation of impacts are required.

Response to Glushon Comment 8

The comments provided by the commenter do not point to any evidence of inadequate public services in the area or provide specific inaccuracies or deficiencies in the analysis presented in the SCEA to which a direct response is possible. As discussed in Section 4, Subsection 4.15, *Public Services*, of the SCEA, analysis of potential environmental impacts of the proposed Project were evaluated in consultation with public services providers in the City, including, but not limited to, the City of Los Angeles Fire Department, City of Los Angeles Unified School District, City of Los Angeles Recreation and Parks Department, and City of Los Angeles Public Library. Impacts would be less than significant.

Glushon Comment 9

The commenter states that although the SCEA finds "no impact", the Project would substantially increase transportation hazards at this location.

Response to Glushon Comment 9

The comments provided by the commenter do not point to evidence of increased hazards, or inaccuracies or deficiencies in the analysis presented in the SCEA to which a direct response is possible. Please refer to Response to Harris Comment 1 regarding transportation impacts.

Glushon Comment 10

The commenter states that the SCEA fails to consider and evaluate the cumulative impacts of the Project together with other identifiable development projects along the Wilshire Boulevard corridor.

Response to Glushon Comment 10

The comments provided by the commenter do not point to evidence of increased hazards, or inaccuracies or deficiencies in the analysis presented in the SCEA to which a direct response is possible. As discussed in Section 4. Section 4.21, *Mandatory Findings of Significance*, the

cumulative analysis in the SCEA conservatively takes into consideration 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of the SCEA). Individual cumulative analyses are contained throughout Subsections 4.1 through 4.20, and cumulative impacts related to all environmental factors would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

Romick Comment Letter

Romick Comment 1

The commenter states a concern regarding congestion along Wilshire Boulevard during construction of the Project.

Response to Romick Comment 1

Please refer to Response to Harris Comment 1 regarding construction traffic.

S. Goodman Comment Letter

S. Goodman Comment 1

The commenter states objection to the Project, specifically regarding site access and congestion.

Response to S. Goodman Comment 1

Please refer to Response to Harris Comment 1 regarding site access and congestion.

Vazirani Comment Letter

Vazirani Comment 1

The commenter states objection to the Project, indicating concerns regarding building density and height.

Response to Vazirani Comment 1

Please refer to Response to Goodman Comment 1 regarding density and Response to Barr Comment 1 regarding building height.

Vazirani Comment 2

The commenter states a concern regarding increased traffic and congestion.

Response to Vazirani Comment 2

Please refer to Response to Harris Comment 1 regarding traffic congestion.

Vazirani Comment 3

The commenter states that the Project requires a variance for the 12-story height, a variance for the 20,000 square foot preschool administration building located in an R1 zone in the southern portion of the property, and for the Belmont to be perpendicular rather than parallel to Wilshire given the narrow rectangular land parcel.

Response to Vazirani Comment 3

The commenter does not accurately describe the requested entitlement approvals for the Project, which properly consist of an Eldercare Facility Unified Permit, a conditional use permit, site plan review, specific plan project permit compliance, design review board approval, and a vesting tentative tract map. The comments do not point to specific inaccuracies or deficiencies in the analysis presented in the SCEA or pertain to the potential environmental impacts of the proposed Project.

Vazirani Comment 4

The commenter states the Westwood HOA does not represent his/her interest or the interest of his/her neighbors, provides information regarding the applicant's attorney, and states that Project in the interest of the developer.

Response to Vazirani Comment 4

The comments do not point to specific inaccuracies or deficiencies in the analysis presented in the SCEA or pertain to the potential environmental impacts of the proposed Project.

Goldstein Comment Letter

Goldstein Comment 1

The commenter states concerns about increased traffic, congestion, and parking in the area and that an EIR should be prepared.

Response to Goldstein Comment 1

Please refer to Response to Harris Comment 1 regarding traffic and Response to Finerman Comment 1 regarding preparation of an EIR.

Barad Comment Letter

Barad Comment 1

The commenter states objection to the Project, indicating a concern regarding building height and density and that the SCEA does not address noise or traffic conditions.

Response to Barad Comment 1

Please refer to Response to Barr Comment 1 regarding building height, Response to Goodman Comment 1 regarding density, Response to Tabibian Comment 1 regarding noise, and Response to Harris Comment 1 regarding traffic.

Schiller Comment Letter

Schiller Comment 1

The commenter states objection to the Project, indicating a concern about building height and density.

Response to Schiller Comment 1

Please refer to Response to Barr Comment 1 regarding building height.

ATTACHMENT A
LLG MEMORANDUM

MEMORANDUM

To:	City of Los Angeles Department of City Planning	Date:	January 15, 2021
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From:	Clare M. Look-Jaeger, P.E. <i>CL-Jaeger</i> Francesca S. Bravo <i>FSB</i> Linscott, Law & Greenspan, Engineers	LLG Ref:	1-16-4165-1
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Subject:	Belmont Village Senior Living Project - Westwood Presbyterian Church - Summary of Approved Transportation Impact Assessments & Site Access/Circulation Review		
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Engineers & PlannersTraffic
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Parking**Linscott, Law & Greenspan, Engineers**600 S. Lake Avenue
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Linscott, Law & Greenspan, Engineers (LLG) has prepared this memorandum to briefly summarize the approved transportation impact assessments and circulation review associated with the proposed Belmont Village Senior Living - Westwood Presbyterian Church project (proposed project). LLG understands that a number of public comments have been submitted to the Planning Department during the proposed project's Sustainable Communities Environmental Assessment public review period pertaining to traffic generation and traffic circulation associated with the project. Therefore, this memorandum has been prepared to not only provide additional detail responses to these comments but also serves as a re-cap of the prior transportation assessment submittal and approval timeline.

Transportation Impact Study/Assessment and City Approval Timeline

The following provides a high-level summary of LLG's prior transportation planning consultation, submittals and City approvals:

- The City of Los Angeles Department of Transportation (LADOT) approved the transportation impact study Scope of Work by executing a formal Memorandum of Understanding (MOU) which was signed on February 2, 2019.

Note that the MOU outlines all parameters for the transportation impact study (e.g., vehicle trip generation forecast, traffic distribution and circulation pattern for purposes of studying impacts at off-site intersections, a listing of other cumulative development in the area, etc.). The MOU also outlines the specific locations of study and analysis methodology that is consistent with the latest LADOT guidelines in effect at that time.

- LLG prepared the transportation impact study dated March 19, 2019 for the proposed project and submitted to LADOT for review. LADOT approved the transportation impact study and issued their interdepartmental clearance letter on April 23, 2019.
- As LADOT issued new City of Los Angeles *Transportation Assessment Guidelines*¹ in response to Senate Bill 743 after issuance of the above

¹ City of Los Angeles *Transportation Assessment Guidelines*, Chapter 2, CEQA Analysis of Transportation Impacts, July 2019.

clearance letter (i.e., which changed the way transportation impacts are evaluated for CEQA and shifts from driver delay, or level of service [LOS], to reduction of vehicle miles traveled [VMT]), LLG prepared a supplemental VMT assessment for consideration by LADOT (dated April 20, 2020).

- All findings (i.e., no significant transportation impacts) of the transportation impact study and VMT assessment were confirmed by LADOT and the department issued a new interdepartmental clearance letter on April 28, 2020.

Project Description

The Belmont Village residential component of the project is planned to provide a mix of 53 independent living housing units, 77 assisted living care guest rooms, and 46 Alzheimer's/dementia care housing guest rooms. The new Education Center building will serve as a replacement pre-school (for up to 105 students in 9,599 square feet) and replacement of administrative offices for the Church. No changes are proposed to the existing operations associated with the Westwood Presbyterian Church.

Forecast Project Trip Generation Forecast

As noted in LLG's March 19, 2019 transportation impact study, the overall project is forecast to result in only 41 net new weekday AM peak hour trips and 49 net new weekday PM peak hour vehicle trips (i.e., less than one vehicle per minute during the commuter peak hours). The following points are noted with respect to the trip generation forecast:

- The small increase in pre-school square footage (849 square feet) is expected to result in only five (5) net new inbound and five (5) net new outbound vehicle trips during the weekday morning (AM) peak hour, and only six (6) net new inbound and six (6) net new outbound vehicle trips during the weekday afternoon (PM) peak hour.
- The pre-school traffic generation exists today (pre-Covid-19 pandemic) and is experienced on weekdays only. As with any school/day care, this traffic generation is short in duration and occurs twice a day with drop-off and pick-up activity.
- No changes in traffic volumes are expected with the Westwood Presbyterian Church.
- The low level of trip generation associated with the senior living component reflects documented trends of low resident vehicle ownership as the majority of residents do not own/operate personal vehicles. Residents typically utilize the Belmont Village shuttle service, which will be provided for residents for medical, dental, and other appointments as well as shopping and recreational activities. Concierge service will also be provided on-site to arrange other transportation needs/services.

Overview of Westwood Presbyterian Church Traffic Circulation

The church's inbound and outbound traffic circulation pattern is shown on page CIRC-1 of the Applicant's recent final Design Review Board submittal (pages CIRC-1 through CIRC-3 are attached as Exhibit 1 to this memo):

- The church has been in operation since 1947 (i.e., 73 years) and will maintain the current access scheme from/to Wilshire Boulevard and Ashton Avenue.
- Three (3) drop-off/pick-up zones will be provided for church patrons; 1) via an approximately 200-foot-long internal drive aisle, 2) within the new subterranean parking structure, and 3) via a new, secondary off-street drop-off/pick-up zone along the Wilshire Boulevard frontage (with a by-pass lane).
- A dedicated church elevator will be provided within the parking structure to transport church patrons to/from the church lobby.

Overview of Pre-School Traffic Circulation

The pre-school's inbound and outbound traffic circulation pattern is shown on page CIRC-2:

- The pre-school has been in operation for over 50 years and a nominal increase in existing trip generation is forecast with the proposed project (i.e., only five (5) net new inbound and five (5) net new outbound vehicle trips during the weekday morning (AM) peak hour, and only six (6) net new inbound and six (6) net new outbound vehicle trips during the weekday afternoon (PM) peak hour).
- With the project, all inbound access will occur via Ashton Avenue and outbound access will occur via both Wilshire Boulevard and Ashton Avenue, as occurs today.
- Entering Ashton Avenue parents/guardians will be able to drop-off/pick-up pre-school student either adjacent to the school or within the parking structure.
- 15-minute loading spaces will be provided within the parking structure outside of dedicated staff parking (within Levels P1 – P3) for use during the short weekday morning drop-off and afternoon pick-up time periods.
- A dedicated pre-school elevator will be provided at the southwest corner of the parking structure and will provide direct access to the school.

Overview of Belmont Village Traffic Circulation

The inbound and outbound traffic circulation pattern associated with Belmont Village is shown on page CIRC-3:

- Future Belmont Village staff, visitors, and those residents that own and bring a vehicle to the site will access the site only via Wilshire Boulevard (i.e., access to/from Ashton Avenue will not be authorized).
- Three (3) drop-off zones will be provided for Belmont Village; 1) via an approximately 200-foot-long internal drive aisle, 2) within the new subterranean parking structure, or 3) via a new, secondary off-street drop-off/pick-up zone along the Wilshire Boulevard frontage (with a by-pass lane) which is planned to also provide valet service.
- An elevator dedicated to Belmont Village users is planned to be provided near the building's central core and will transport Belmont Village users between the main lobby and the subterranean parking levels.
- Any valet vehicle pick-up is planned to occur via the northbound drive aisle, south of Wilshire Boulevard.
- Appropriate signage will be posted to direct all Belmont Village users to enter and exit the site only via Wilshire Boulevard.

Summary of Intersection Impact Analysis and Site Access/Circulation Review

Intersection Impact Analysis

The significance of the potential impacts of project-generated traffic at off-site intersections was identified using the traffic impact criteria set forth in LADOT's *Transportation Impact Study Guidelines* that were current at the time of MOU execution. Traffic impacts were considered significant if the project-related increase in the intersection's volume-to-capacity (v/c) ratio equals or exceeds the thresholds presented in the below table:

CITY OF LOS ANGELES INTERSECTION IMPACT THRESHOLD CRITERIA		
Final v/c	Level of Service	Project Related Increase in v/c
> 0.701 - 0.800	C	equal to or greater than 0.040
> 0.801 - 0.900	D	equal to or greater than 0.020
> 0.901	E or F	equal to or greater than 0.010

As nominal increases in the v/c ratios at all study intersections were forecast (i.e., increases in the v/c ratios of no more than 0.004 at LOS E or F locations, no more than 0.005 at LOS D locations, and no more than 0.003 at LOS C or better locations), no significant traffic impacts were anticipated.

Site Access/Circulation Review

LADOT previously reviewed and approved the above summarized site access and circulation schemes for purposes of assessing potential traffic impacts on the surrounding street system and at the specific study intersections outlined in the approved MOU. Final LADOT clearance requires another review of the specific design of the site access, driveways, and internal circulation when more detailed building construction plans become available.

The Applicant will ensure that the project design will comply with all applicable City standards and guidelines pertaining to the specific driveway widths and design, internal drive aisle widths, vehicle queuing/stacking areas and lengths, parking space dimensions, among others.

Summary of Vehicle Miles Traveled Analysis

As indicated in LADOT's April 28, 2020 interdepartmental clearance letter, the proposed project is forecast to generate the following:

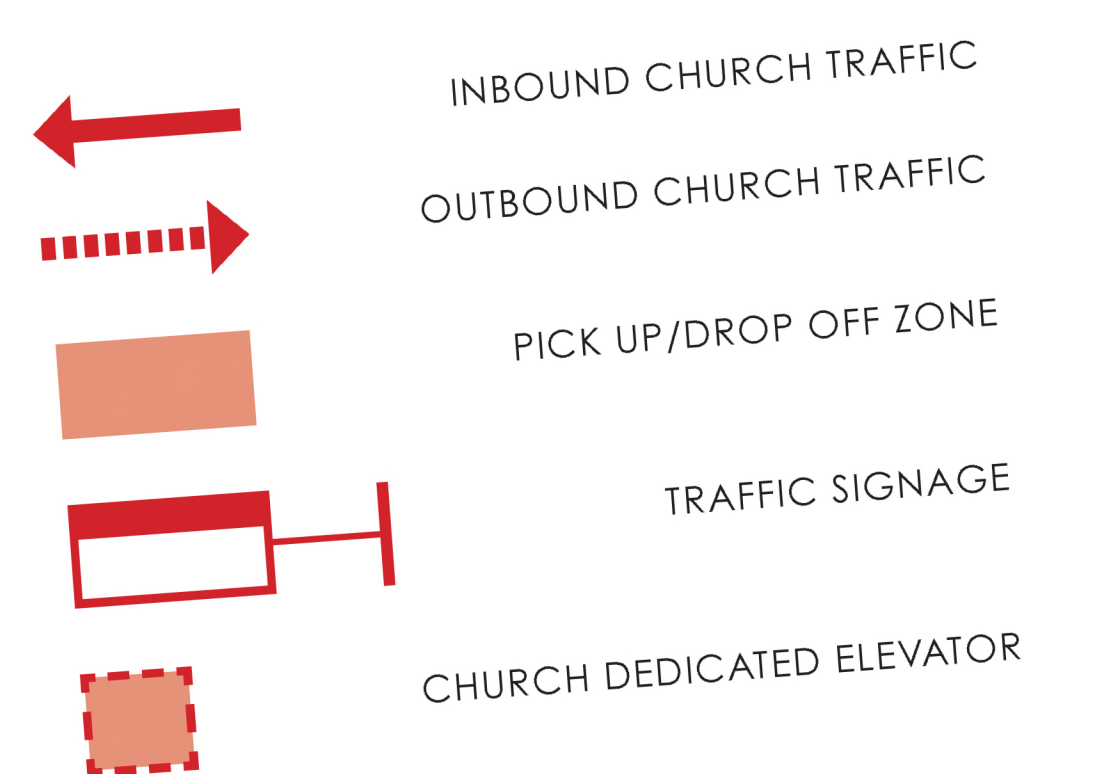
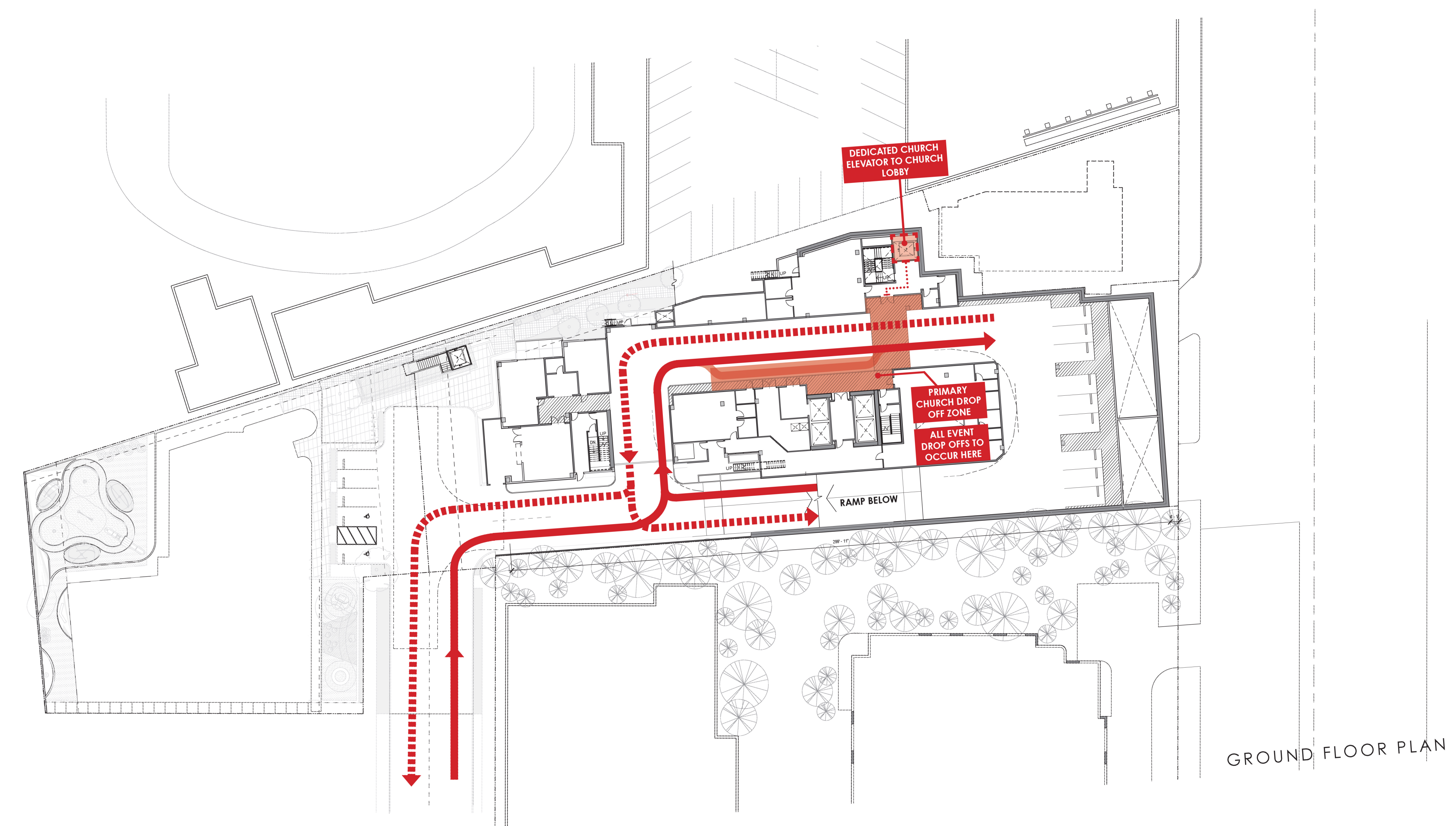
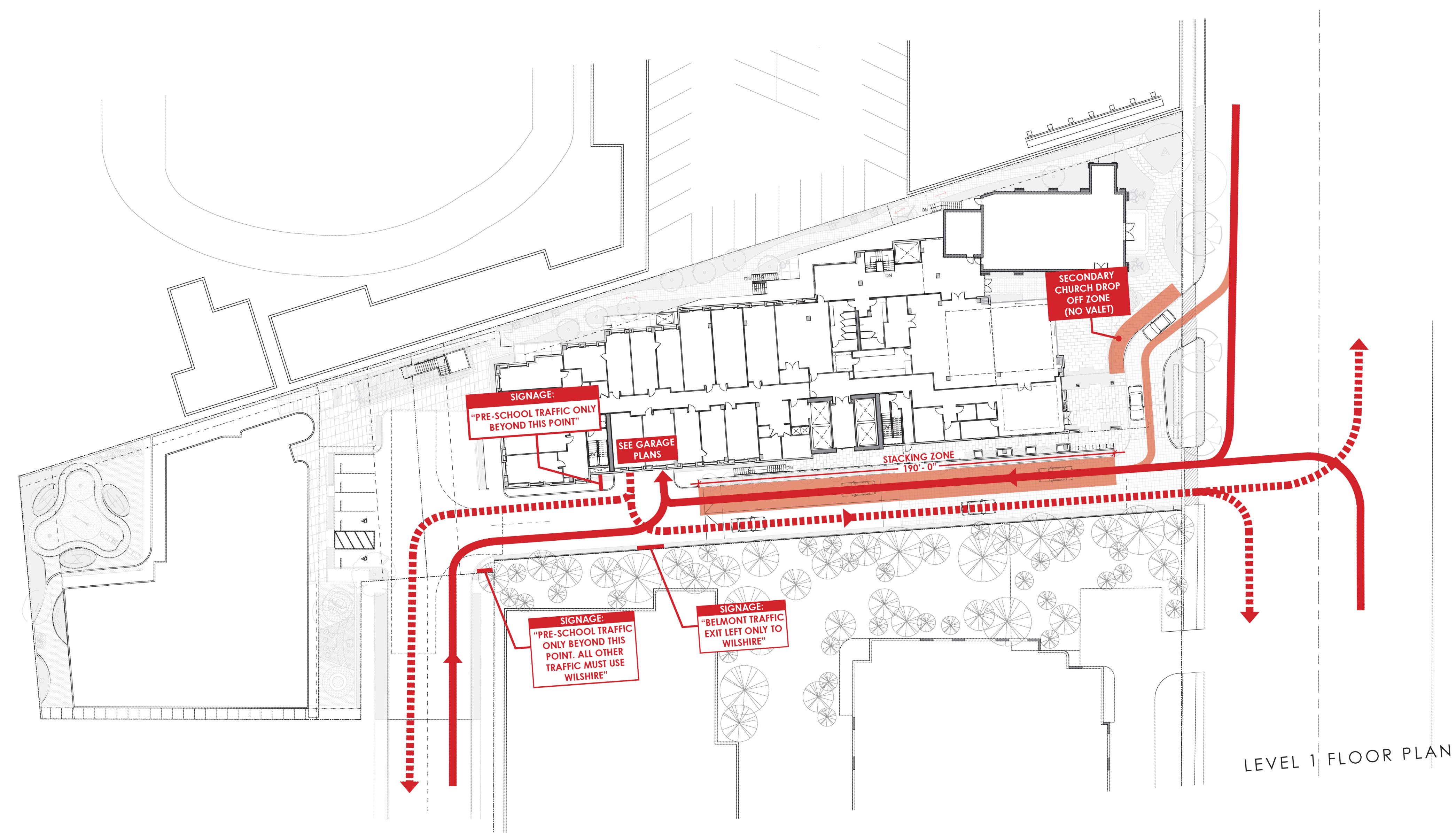
- The estimated daily household VMT per capita for the proposed project's residential component land use component is 6.0 daily household VMT per capita, which is less than the West Los Angeles APC significance threshold of 7.4 VMT per capita.
- The estimated daily work VMT per employee for the proposed project's office land use component (i.e., the Education/Pre-School Day Care Center) is 2.9 daily work VMT per employee, which is less than the West Los Angeles APC significance threshold of 11.1 VMT per employee.

Thus, based on the above analyses, the project is not expected to result in a significant VMT impact. Therefore, no mitigation is necessary.

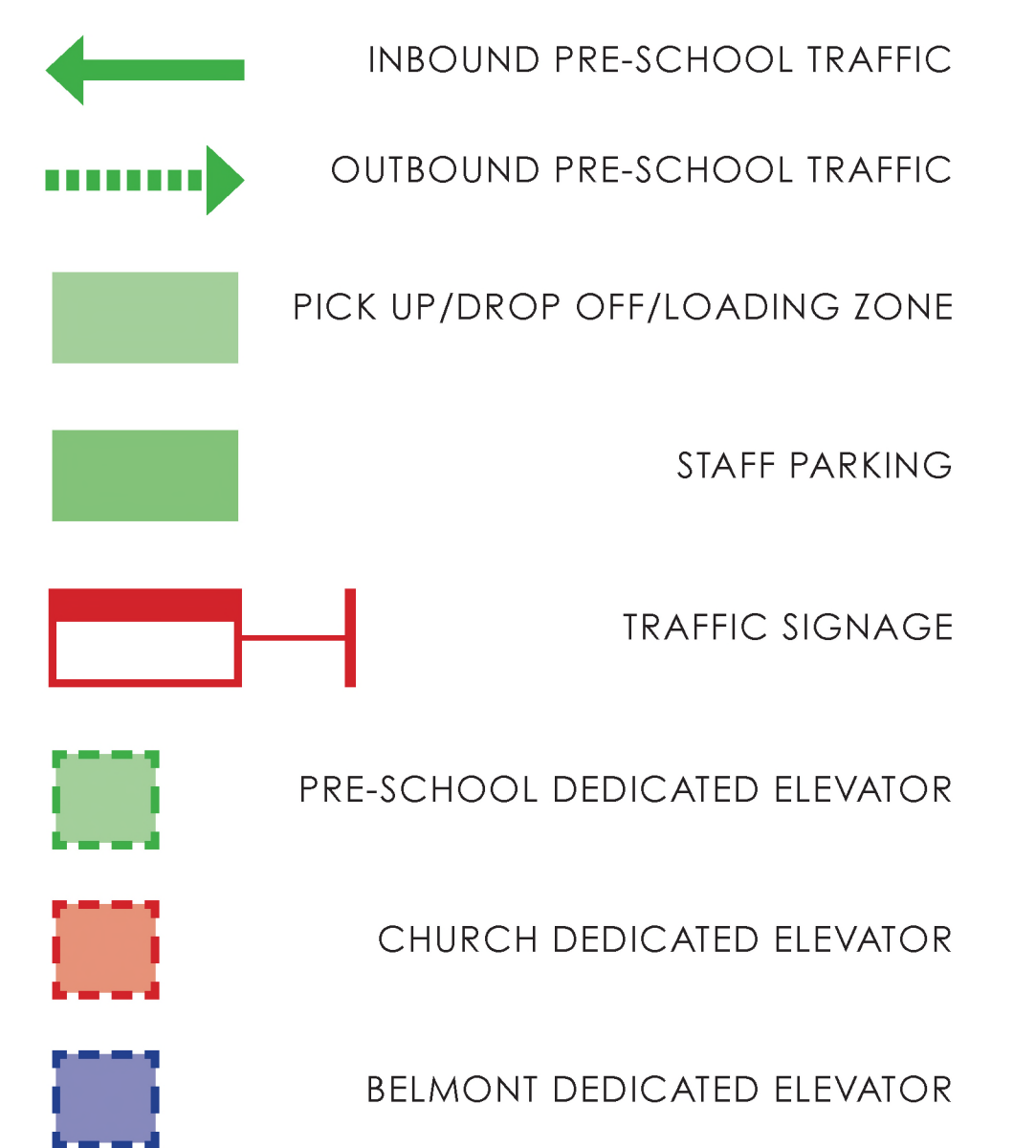
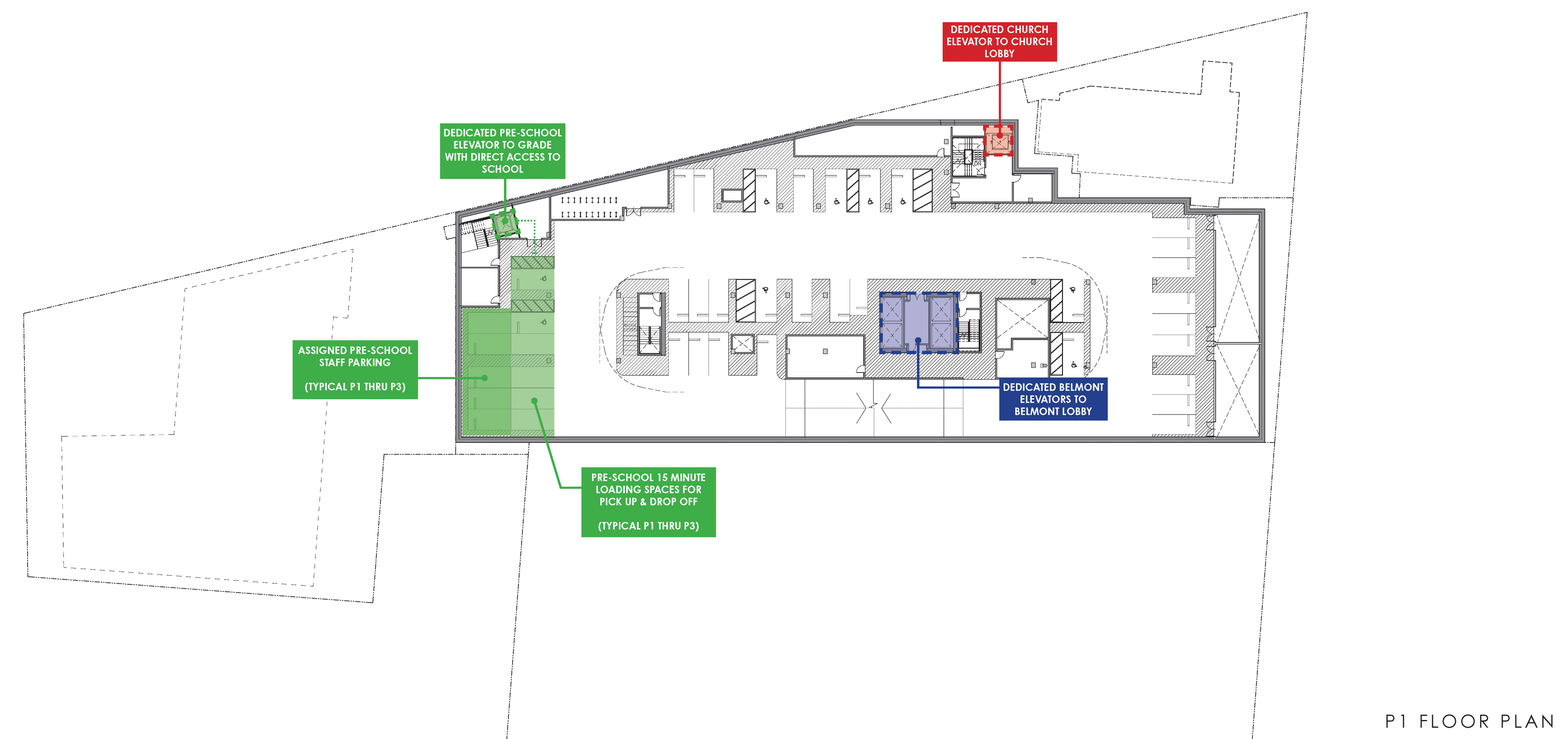
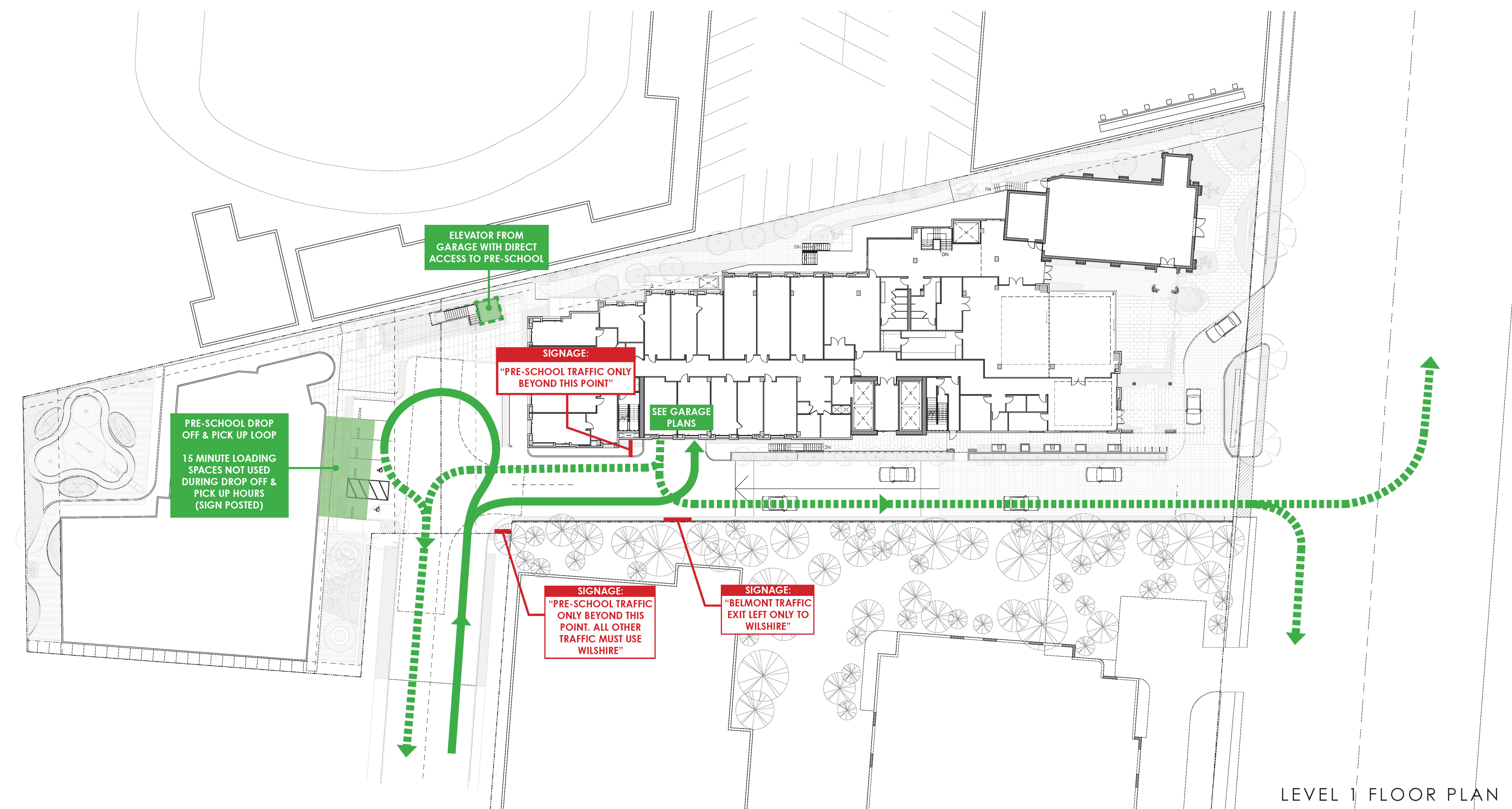
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EXHIBIT 1

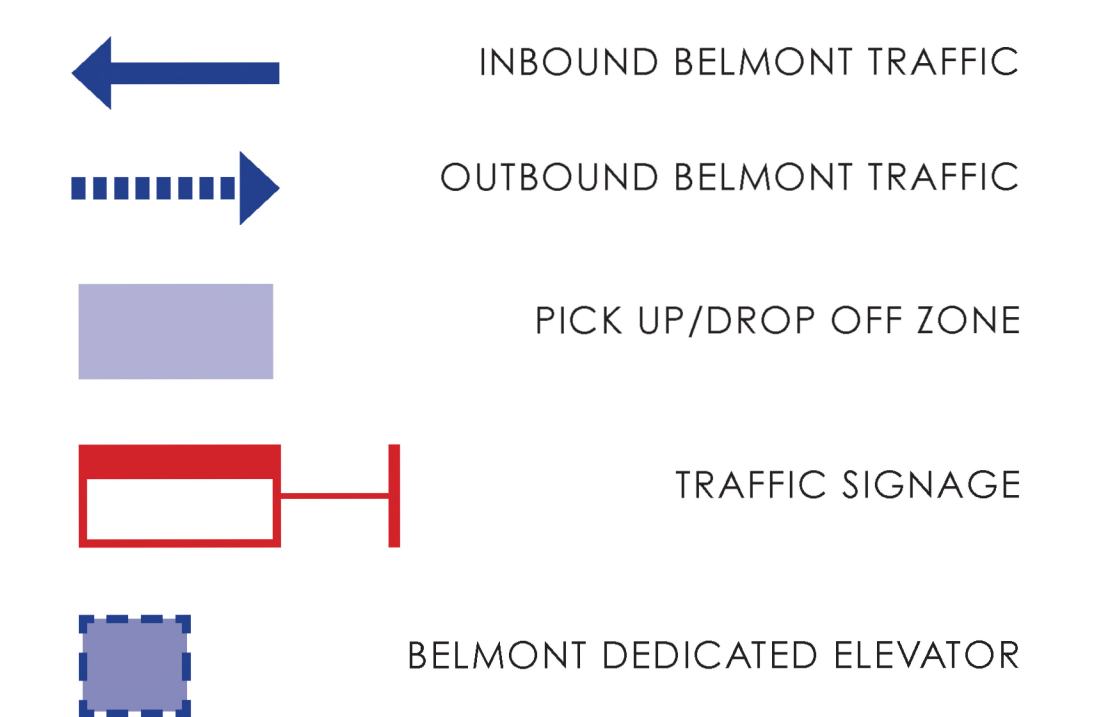
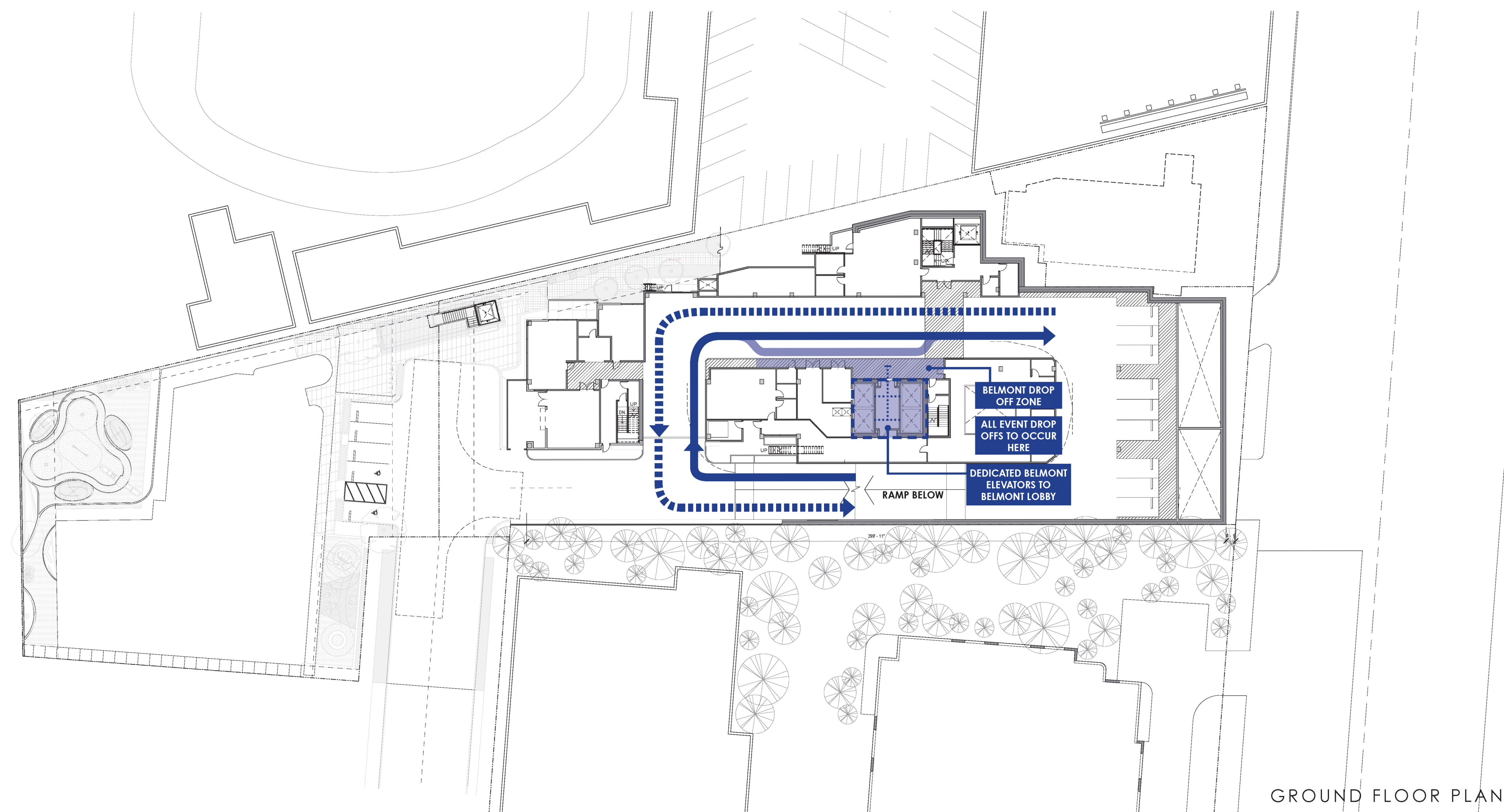
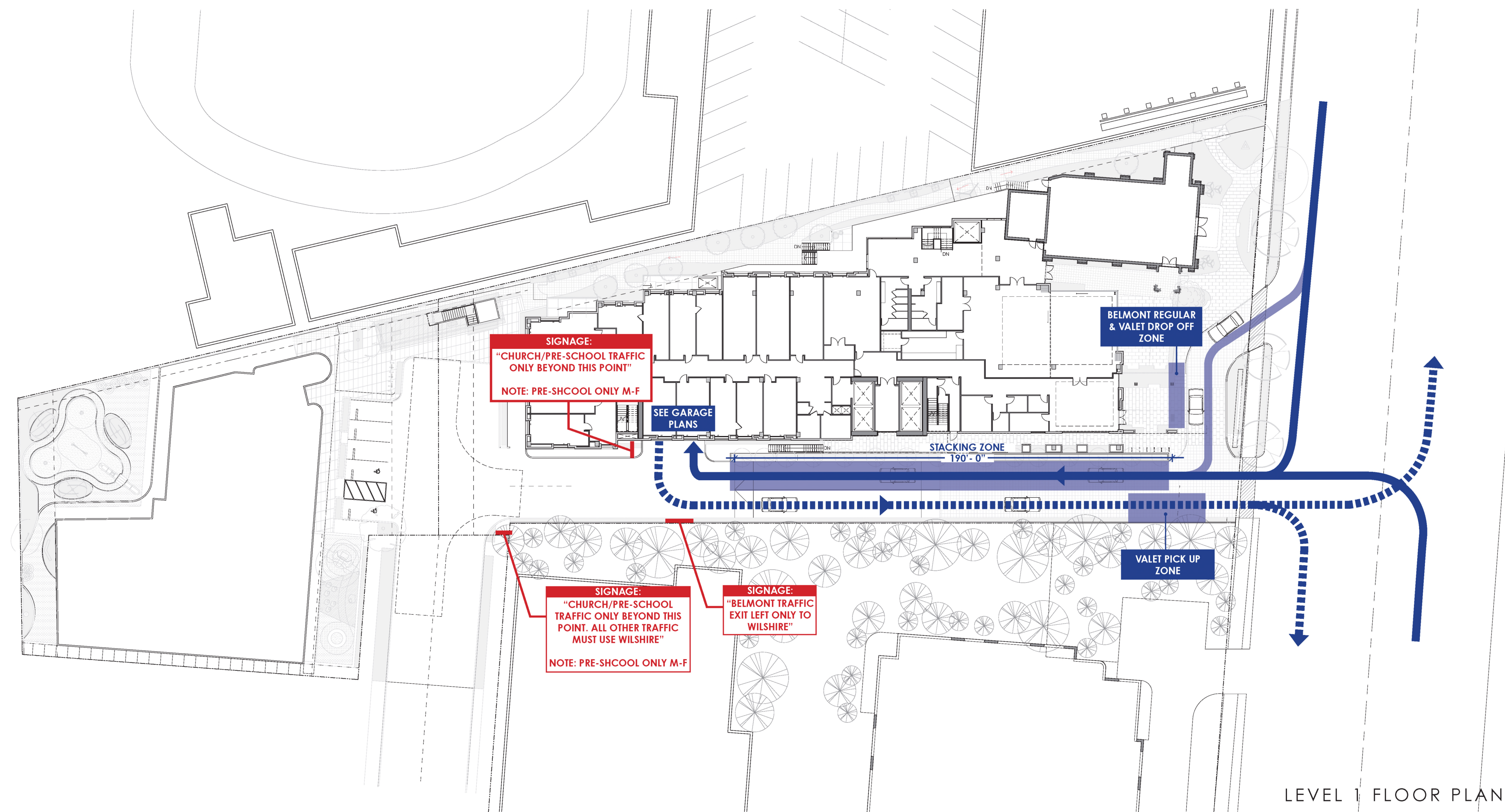
TRAFFIC CIRCULATION DIAGRAM DESIGN REVIEW BOARD SUBMITTAL



CHURCH TRAFFIC CIRCULATION



PRE-SCHOOL TRAFFIC CIRCULATION



BELMONT VILLAGE TRAFFIC CIRCULATION

ATTACHMENT B
COMMENT LETTERS

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 266-3574
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Caltrans

*Making Conservation
a California Way of Life.*

December 1, 2020

Robert Keatinge
Los Angeles City Planning Department
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: Belmont Village Senior Living Westwood II
Project – Sustainable Communities
Environmental Assessment (SCEA)
SCH# 2020110207
GTS# 07-LA-2020-03420
Vic. LA-405 PM 31.553

Dear Robert Keatinge,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Project would construct a new 12-story, 176,580-square foot Eldercare Facility containing up to 53 Senior Independent Housing dwelling units, 77 Assisted Living Care Housing guest rooms, 46 Alzheimer's/Dementia Care Housing guest rooms, and associated residential amenity and service areas within a single building located at 10822 Wilshire Boulevard. In addition, the Eldercare Facility would provide a new 2,520-square foot Fellowship Hall on the ground level fronting Wilshire Boulevard for use by the Church, and 2,923 square feet of shared space. The Project would also construct a new two-story, 19,703-square foot Childcare Facility containing 10,238 square feet of classroom, administrative office space, and multipurpose/group space and 1,845 square feet of church-related administrative offices within a single building located at 10812 Ashton Avenue. A minimum of 184 parking spaces would be provided on the ground floor level adjacent to the Childcare Facility and within a three-level subterranean parking garage. The Project would also provide up to 27 short-term and 43 long-term bicycle parking spaces. To allow for construction of the Project, the Church's existing preschool, Fellowship Hall, administrative offices, and surface parking lot located at 10822 Wilshire Boulevard, and a Church-owned single-family residence located at 10812 Ashton Avenue would be demolished. The Church's existing Sanctuary located on the northern portion of the Project Site fronting Wilshire Boulevard would remain.

The nearest State facility to the proposed project is I-405. After reviewing the SCEA, Caltrans has the following comments:

Caltrans acknowledges and supports mixed-use, infill development that prioritizes nearby transit service, like the proposed Project aims to facilitate. However, due to the amount of car parking, the Belmont Village Senior Living Westwood II Project is still designed in a way that induces demand for additional vehicle trips. This demand should be addressed with appropriate design and management principles. Caltrans supports reducing the amount of parking whenever possible. Research looking at the relationship between land-use, parking, and transportation indicates that car parking prioritizes driving above all other travel modes and undermines a community's ability to choose public transit and active modes of transportation. For any community or city to better support all modes of transportation and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) measures as an alternative to requiring car parking. If the underground parking must be built, it should be designed in a way that is conducive to adaptive reuse. They should contain flat floors with ramps on the exterior edge, so that they can be more easily converted to more beneficial uses in the future.

1
Cont.

2

Additionally, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. Any work that would affect the freeways and its facilities, Caltrans has the jurisdiction for review and approval. We recommend large size truck trips be limited to off-peak commute periods.

3

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2020-03420.

Sincerely,

Miya Edmonson

MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse



Robert Keatinge <robert.keatinge@lacity.org>

Re: Belmont/WPC Project

1 message

Dylan Sittig <dylan.sittig@lacity.org>
To: "Malcolm H. Harris" <mharris201@yahoo.com>
Cc: Robert Keatinge <robert.keatinge@lacity.org>

Tue, Nov 17, 2020 at 3:46 PM

Hello Malcolm,

Thank you for your comment. It has been received and will be added to the Case File.

Sincerely,
Dylan

On Tue, Nov 17, 2020 at 3:24 PM Malcolm H. Harris <mharris201@yahoo.com> wrote:

This letter is to express my objection to the above proposed project.
If approved it will make an already terrible traffic situation worse.
It is no longer safe to be a pedestrian or driver in this part of Wilshire Blvd.
It will also open other opportunities for similar projects in the area.
I urge you to deny the request.
Thank you for your attention to his matter.
Doralyn Harris
[10580 Wilshire Blvd.](#)
[#51](#)

1



Dylan Sittig
City Planning Associate
Los Angeles City Planning
[200 N. Spring St., Room 720](#)
[Los Angeles, CA 90012](#)
[Planning4LA.org](#)
T: (213) 978-1197





Robert Keatinge <robert.keatinge@lacity.org>

10822 Wilshire

Brian Barr <charles.brian@yahoo.com>

Mon, Nov 30, 2020 at 10:06 AM

To: "robert.keatinge@lacity.org" <robert.keatinge@lacity.org>

Good Morning,

I would like to go on record as someone who is strongly against the proposed Belmont project at [10822 Wilshire Blvd](#). I've heard many people articulate their feeling much better than I can but I'd like to echo their sentiments. It's my understanding that this project is requesting an exception to the height limitations. If favors are granted then it destroys the purpose of having rules in the first place. It raises suspicion and calls into question the motives of people who helped move this forward. Additionally, this facility does not bring anything positive to the area. It will mean more traffic, noise, congestion and the area will feel less residential and more commercial. The only people that benefit from this project are the developers. This project would not be allowed to move forward in a single-family home neighborhood, why allow it next to condominium and apartment communities? I greatly appreciate you hearing me out.

Thank you and take great care,

Brian

**Luttrull**

Robert Keatinge <robert.keatinge@lacity.org>

Case Number: ENV-2019-5735-SCEA/Related Case Number: ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR, VTT-82107

Christina Luttrull <proverbs31wife4life@gmail.com>

Tue, Dec 1, 2020 at 1:53 PM

To: robert.keatinge@lacity.org

RE:

Case Number: ENV-2019-5735-SCEA**Related Case Number:** ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR, VTT-82107**Council District:** 5 - Koretz**Community Plan Areas:** Westwood**Project Location:** 10822 W. Wilshire Boulevard and 10812 W. Ashton Avenue, Los Angeles, CA 90024

Dear Mr. Keating.

I am opposed to the case listed above for many reasons. A couple of main reasons are sited below.

- The main entrance and exit are on Wilshire Blvd with a "drop-off" area just inside the curb on Wilshire, which will cause a back-up onto Wilshire Blvd.: Visitors, deliveries (food, supplies, medications), church visitors, community meetings, employees, doctors, special services, repairs, and emergency vehicles - all along with 200 employees.
- Entrance off of Ashton Ave, which dead-ends into the property. Will be used, we are told, specifically for parents to drop off and pickup (5days a week 2X a day) 125 pre-school students, toddlers and enfants between the hours of 7-8 AM. That amounts to 100+ cars arriving during a short period of time. Currently, they have a very large parking lot in which to park and walk their children inside. There will be no space at this "turn around" for parents to walk them into school with this new arrangement. There are only 5 parking spaces in front of the school.

I do not want this approved.

Respectfully,
Christina Luttrull, MBA

Chief Operating Officer
Luttrull Enterprises

"Vision without action is a daydream. Action without vision is a nightmare."
Japanese Proverb



Robert Keatinge <robert.keatinge@lacity.org>

Re: Dana Goodman - Belmont Expansion Project

2 messages

Dylan Sittig <dylan.sittig@lacity.org>

Wed, Nov 18, 2020 at 1:56 PM

To: Dana Goodman <dana@atlasrealestate.us>

Cc: Robert Keatinge <robert.keatinge@lacity.org>

Hello,

Written comments on this project should be directed to Robert Keatinge at <robert.keatinge@lacity.org>.Sincerely,
DylanOn Wed, Nov 18, 2020 at 12:21 PM Dana Goodman <dana@atlasrealestate.us> wrote:

Hi Dylan,

I am writing to let you know that I, and my family, own two residence near the Belmont. One residence is immediately across the street at the Blair House condos and the other is a few blocks away on Dalehurst. The proposed Belmont expansion project grossly over burdens their allotted development per their lot size and therefore burdens the entire area. Kindly advise me of where I can make a written objection.

Thank you,

Dana

[Dana Goodman](#)[310.650.4442](tel:310.650.4442)**From:** Cora Lopez <theblairhouse1@gmail.com>**Sent:** Tuesday, November 17, 2020 1:55 PM**Subject:** Memo - Belmont Expansion Project Petition-Meeting Via Zoom - Tomorrow November 18 @ 6:00 pm

Good afternoon,

Please see attached memo.

Thank you.



Blair House

Cora Lopez

Blair House HOA Management

Phone: (310) 475-8032

Fax : (310) 475-4994

Email: theblairhouse1@gmail.com



Dylan Sittig

City Planning Associate

Los Angeles City Planning

200 N. Spring St., Room 720

Los Angeles, CA 90012

Planning4LA.org

T: (213) 978-1197



Dylan Sittig <dylan.sittig@lacity.org>
To: Robert Keatinge <robert.keatinge@lacity.org>

Wed, Nov 18, 2020 at 1:57 PM

Includes the attachment

[Quoted text hidden]

 **DOC11_17_20002.pdf**
408K



MEMORANDUM

TO: Homeowners and Residents
FROM: Management Office
DATE: November 17, 2020
RE: **Belmont Expansion Project Petition
Meeting Via Zoom- November 18th at 6:00 PM**

Dear Homeowners and Residents,

We have been asked to circulate the attached information to all of you:
Most of the buildings on the Wilshire Corridor are doing the same:

This memo is in regards to the Belmont Expansion Project / involving the Belmont Village & Westwood Presbyterian Church in which they are asking the city to approve and to allow them to add 10 stories to their existing building. Ms. Kay Waldman, President of the Westwood Neighbors for Sensible Growth representing the Wilshire Corridor buildings and adjacent areas that will be impacted by this approval.

Please review and if you would like to support the cause please detach the petition and fill it out. Please return the petition to the Management Office and we will forward them on to the Westwood Neighbors for Sensible Growth.

Thank you.

NEIGHBORHOOD NEEDS**Before Developer's Greed**

Westwood Neighbors for Sensible Growth

Save the Date - DRB Meeting via Zoom 11/18/20**Hello Neighbors,**

This coming Wednesday, November 18th at 6:00 PM the Design Review Board will be having their second meeting for the Belmont/WPC project. Many of you joined us during their first meeting and we hope to see more of you this time around.

FYI: Unless you choose to speak at the meeting or send a written comment. your participation will not be acknowledged as a supporter of WNSG. This came to our attention after our meeting with the NWWNC on November 4th:

SUGGESTED SPEAKING POINTS:

- Height restriction to 6-stories (more appropriate for the lot size)
- The school/administration building seeking 19,567 sq ft in residential (R-1) max 7,442 sq ft
- Big traffic issues for Malcolm, Ashton, Wellworth & Glendon Avenues

"I am against this project because it is a misfit in every way and I agree with the other reasons for blocking this project as proposed" (for those who prefer a script)

LOGIN INFORMATION**Instructions for access via computer:****<https://tinyurl.com/yy3ky4ml>**

Webinar ID: 848 1607 0418

Password: 801840

Go to link above and enter the password when prompted. You may also access the meeting via www.zoom.com and entering the Webinar ID and password when prompted. If you have the correct software installed, you can join by entering the Webinar ID and password from the Zoom application.

OR join via telephone:

US: +1 669 900 9128 or +1 213 338 8477

Webinar ID: 848 1607 0418

Dial one of the phone numbers listed above. You will be asked for a Webinar ID, enter "848 1607 0418" followed by "#" (pound sign). You will be asked to enter a participant ID, enter "#" (pound sign) to continue. Then you will then be joined into the webinar.

Thank you for your participation.

Kay Waldman, President WNSG

Questions? Email: info.wnsg@gmail.com

Visit our Website: www.neighborsforsensiblegrowth.org



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Los Angeles City Planning Department

200 North Spring Street, Los Angeles, CA 90012

WEST LOS ANGELES AREA PLANNING COMMISSION JURISDICTION Westwood Community Design Review Board PUBLIC HEARING NOTICE

Board Members:

James Grant, Board Chair
Bob Mirdamadi, Board Vice Chair
Adam Moos, Board Member
Alex Wuo, Board Member

Julia Shuart, Board Member
Shelby Roos-Grayeli, Board Member
Gene Fong, Board Member

Date: Wednesday, November 18, 2020
Time: 6:00 PM

Place: In conformity with the Governor's Executive Order N-29-20 (March 17, 2020) and due to concerns over COVID19, the Design Review Board meeting will be conducted entirely telephonically.

Instructions for access via computer:

<https://tinyurl.com/vy3ky4ml>
Webinar ID: 848 1607 0418
Password: 801840

Go to link above and enter the password when prompted. You may also access the meeting via www.zoom.com and entering the Webinar ID and password when prompted. If you have the correct software installed, you can join by entering the Webinar ID and password from the Zoom application.

OR join via telephone:

US: +1 669 900 9128 or +1 213 338 8477
Webinar ID: 848 1607 0418

Dial one of the phone numbers listed above. You will be asked for a Webinar ID, enter "848 1607 0418" followed by "#" (pound sign). You will be asked to enter a participant ID, enter "#" (pound sign) to continue. Then you will then be joined into the webinar.

Agenda

- 1 Call to Order
- 2 Review of Agenda

Agenda items may be taken out of the order listed.

All Written Submissions and Presentation Materials, including this Agenda, are available for viewing at: <https://tinyurl.com/vcprybe6>. Additional case information can be found at <https://planning.lacity.org/pdiscaseinfo/>.

If you are interested in speaking on an Agenda Item or being placed on the Interested Parties list for any of the items on the Agenda please fill out the following form: <https://tinyurl.com/y5c8hnat>

If you are unable to download or access any of these documents, please email planning staff at dylan.sittig@lacity.org.

3 Public Hearing

- a. DIR-2020-3896-DRB-SPP-P; ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR; VTT-82107; ENV-2018-3423-MND; ENV-2019-5735-SCEA (10822 W.

Page 1 of 2

Wilshire Blvd.) FINAL REVIEW for a new 12-story eldercare facility with 176 units (53 dwelling units / 123 guest rooms), and shared amenity space with the existing church, and new childcare facility/church-related administrative office building. (Applicant's Representative: Todd Nelson, Armbruster Goldsmith & Delvac LLP)

4 Public Comment Period*

5 Adjourn

Next Scheduled Meeting is December 2, 2020 (Pending submission of new cases).

"The DRB shall provide an opportunity in open meetings for the public to address items of interest to the public that are within the subject matter and jurisdiction of the DRB. Individual testimony within the public comment period shall be limited to three (3) minutes per person and up to ten (10) minutes per subject. However, the DRB chairperson has the discretion to modify the time allotted on each subject, to each speaker and the number of speakers per subject. Items may be called in any order at the discretion of the DRB chairperson.

Under the provisions of the Brown Act (Gov. Code Sec. 54959-54960), the Westwood Community Design Review Board is a "legislative body" and must: 1. Conduct all quorum meetings in public; and 2. Post all agenda items or issues considered for discussion seventy-two (72) hours before public meetings. Public notices are posted at the Offices of the Planning Department, the Planning Department Website, and at the appropriate Council Office(s). Public notices are also posted on the Department of City Planning Website: <http://planning.lacity.org>

MATERIALS SUBMITTED FOR THE ABOVE REFERENCED CASES ARE AVAILABLE FOR REVIEW BY CONTACTING THE STAFF CONTACT.

If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized here, or in written correspondence on the matters delivered to this agency at or before the public hearing.

PERSONS WISHING TO PROVIDE PUBLIC COMMENT: When the Agenda item you wish to speak on comes up, please press "9" to "raise your hand". Following the item presentation, Board staff will unmute those wishing to provide public comment and who have "raised their hand" (by pressing "9"). When called upon, you can begin to provide public comment for your allotted time. Staff will track your allotted time and give you a warning before the end of your allotted time, subsequently re-muting your line when your allotted time has concluded. Should there be any questions from the Board or Planning staff requiring your response, you will again be unmuted.

REQUIREMENTS FOR SUBMISSION OF MATERIALS: Written materials may be submitted prior to the hearing via email to dylan.sittig@lacity.org. Submissions on the day of the public hearing may not be more than two (2) written pages, including exhibits and must include the case and agenda item number on the cover or first page. Photographs do not count toward the page limitation. The submission must be given to Planning staff prior to the start of the hearing, who will distribute them to the Board. Public Submissions are available to view at: <https://drive.google.com/drive/folders/1YDdFkIyKZeATgmdUby77hgYBn98ZUS5>.

Contact Information:

- **Department of City Planning:** Department of City Planning, West/South/Coastal Project Planning 200 N. Spring Street, Room 721, Los Angeles, CA 90012
 - o Staff Contact: Dylan Sittig, Tel: 213.978.1197, E-mail: dylan.sittig@lacity.org
 - o Internet: <https://planning.lacity.org/about/commissions-boards-hearings>
(Click on Boards → Westwood)

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You are receiving this email because you opted in via our website.

Our mailing address is:

Westwood Neighbors For Sensible Growth

[10800 Wilshire Blvd Apt 1003](#)

[Los Angeles, CA 90024-4205](#)

Add us to your address book

Want to change how you receive these emails?

You can update your preferences or unsubscribe from this list.



mailchimp

SUPPORT THE WILSHIRE-WESTWOOD SPECIFIC PLAN

Help us put Neighborhood Needs before Corporate Greed

By signing the petition, I agree that I support the Wilshire-Westwood SC Specific Plan and oppose the Belmont project as proposed

1. PRINT NAME _____ Address _____ City&Zip _____

Phone _____ Email _____ x _____

2. PRINT NAME _____ Address _____ City&Zip _____

Phone _____ Email _____ x _____

3. PRINT NAME _____ Address _____ City&Zip _____

Phone _____ Email _____ x _____

4. PRINT NAME _____ Address _____ City&Zip _____

Phone _____ Email _____ x _____

5. PRINT NAME _____ Address _____ City&Zip _____

Phone _____ Email _____ x _____



Robert Keatinge <robert.keatinge@lacity.org>

Belmont Senior Living Project

Dana Zinderman <danazind2012@gmail.com>

Mon, Nov 30, 2020 at 9:27 PM

To: robert.keatinge@lacity.org

Dear Mr. Keatinge,

I am writing to you to communicate my strong opposition for the currently proposed 12-story Belmont Village Senior Living Project. It should be noted that this will be a very expensive elder care facility, which will not provide accessible senior living for most Westwood residents.

I live on Ashton Avenue, two houses down from the beginning of the proposed project.

As you are aware, the Westwood Specific Plan limits construction to 6-stories; the Belmont seeks to obtain an entitlement pathway via the eldercare ordinance but has not shown any significant hardship as required for a ZAD for an Eldercare Facility Use. (The only hardship I have heard mentioned is that this out-of-state company requires 12-stories for profitability.)

My concerns are :

Use of Ashton Avenue for access to the Belmont, the church and the school:

—There is no practical way that the Belmont and the church can stop visitors, workers, and suppliers from entering the parking structure via Ashton. As it is, Ashton Avenue is already congested; many drivers assume that Ashton is a through street. My driveway is constantly used for drivers to turn around in as it is, and guests have been unable to leave our property until broken down cars were towed.

—The 12-story building will necessitate higher staffing levels, more visitors, and more supply deliveries. The increase in the school/office building will mean more students who need to be dropped off and picked up; and the size of the office building with “community space” will mean more visitors to the site. They will use Ashton for convenience.

—In non-Coved times there are many times that Ashton has a line of cars waiting to enter the parking lot, which often blocks my driveway. The line of cars will increase with the proposed 12-story building and large school/office building.

Parking overflow

—The proposed structure does not have enough parking because of the assumption that employees, visitors, etc. will use public transportation or bicycles. Assuming that employees will use public transportation does not take into account where those

employees might live; even when the new subway reaches Westwood it will not be accessible for employees that do not live near a subway stop. Few employees or visitors will bike to the Belmont, and it is ridiculous to assume it.

Los Angeles is a car town, and most of the employees and visitors will drive and search into the neighborhood for parking. There is no close parking near Ashton that doesn't require a permit. The streets nearby and blocks away will be crowded with traffic, and residents will find it harder to find parking for themselves and their guests.

2
Cont.

Belmont

—Belmont is hoping for a 12-story height fancy elder care facility, a 20k+ square foot preschool administration building located in an R1 zone in the south and for the Belmont to be perpendicular rather than parallel to Wilshire given the narrow rectangular land parcel. There are no reasons to grant these wishes to an out-of state company who is putting profits over community.

Over 1300 homeowners have signed a petition to oppose the project as is currently proposed. I am very concerned that the neighborhood will change drastically should the Belmont be built as proposed.

Please relay my concerns to the zoning administrator.

Sincerely,

Dana Zinderman
10806 Ashton Avenue
Los Angeles, Ca 90024
(818) 235 - 2002

3



Robert Keatinge <robert.keatinge@lacity.org>

Re: Objection to the Belmont construction in Westwood

1 message

Dylan Sittig <dylan.sittig@lacity.org>

Wed, Nov 18, 2020 at 5:13 PM

To: Diane Forester <dianeforester@verizon.net>

Cc: Robert Keatinge <robert.keatinge@lacity.org>

Hello Diane,

Thank you for your comment. It has been received and will be added to the case file.

Sincerely,
Dylan

On Wed, Nov 18, 2020 at 4:26 PM Diane Forester <dianeforester@verizon.net> wrote:

I object to the construction of the Belmont facility on Wilshire Blvd. In the church area.

I am against this project because it is a problem in every way and I agree with the other reasons for blocking this project as proposed.

The additional traffic, the constant noise of ambulances and sirens 24 hours a day, the constant traffic movement of staff, visitors etc. will be an added traffic problem to an already heavily traffic area.

A 12 story building will block the views of the adjacent building facing west and will block all sunlight in those units. It is not needed and also unfair.

The builders greed should not be considered in this project. It is deceitful and not thought out.

Thank you,
Diane Forester
Westwood resident living in a high rise on Wilshire Blvd.Diane Forester
(310) 569-8033 cell/text

--

Dylan Sittig

11/18/2020

City of Los Angeles Mail - Re: Objection to the Belmont construction in Westwood



City Planning Associate

Los Angeles City Planning

200 N. Spring St., Room 720

Los Angeles, CA 90012

Planning4LA.org

T: (213) 978-1197





Robert Keatinge <robert.keatinge@lacity.org>

Fwd: Re the Belmont development

Nan Waldman <nan@nanwaldman.com>
To: robert.keatinge@lacity.org

Tue, Dec 1, 2020 at 12:29 PM

Oops! I sent to the wrong address! See email forwarded below!!

Thank you!
Nan Blum

Begin forwarded message:

From: Nan Waldman <nan@nanwaldman.com>
Date: December 1, 2020 at 11:21:43 AM PST
To: robert.keatinge@lacity.org
Cc: Councilmember Paul Koretz <Paul.Koretz@lacity.org>
Subject: Re the Belmont development

Hi,

I live and shop in the Westwood area and am writing to urge you reconsider the process of evaluating the Belmont project. Re: <https://planning.lacity.org/development-services/environmental-review/scea/belmont-village-senior-living-westwood-ii-project-1>

I feel that this (linked) report is inadequate for this project given its size, scope, location and unwanted impacts on the neighborhood.

An EIR should be required of Belmont since the traffic impacts will overwhelm Wilshire Blvd and the surrounding neighborhood streets, including Ashton, Glendon, Malcolm, and Wellworth Avenues.

The main entrance and exit are on Wilshire Blvd, with a "drop-off" area just inside the curb on Wilshire. This is a bad design as it will cause a back-up of traffic onto Wilshire Blvd. Visitors, deliveries (food, supplies, medications), church visitors, community meetings, employees, doctors, special services, repairs, and emergency vehicles - along with 200 employees — will be using this shallow area as access. Too many people create a bottleneck.

Also, the entrance off of Ashton Ave dead-ends into the property. I understand it will be specifically used for parents to drop off and pickup (5days a week 2X a day) 125 pre-school students, toddlers and babies between the hours of 7-8 a.m. With 100+ cars arriving during a short period of time, again, this will create a bottleneck. As of this writing, there is a large parking lot for parents to use for drop off and pick up. They can currently park and walk their children inside. But with the new and badly designed school traffic plan, there will be no space at this location to "turn around" and for parents to walk their young children into school. There are only 5 parking spaces in front of the school. This is completely inadequate for the contemplated population which is intended to be using this location.

Case Number: ENV-2019-5735-SCEA

Related Case Number: ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR, VTT-82107

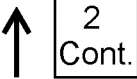
Council District: 5 - Koretz

Community Plan Areas: Westwood

Project Location: 10822 W. Wilshire Boulevard and 10812 W. Ashton Avenue, Los Angeles, CA

90024

Please follow the normal planning process for impactful development and require a thorough and objective Environmental Impact Report.



Thank you,
Nan Blum
[1840 Fairburn Ave](#) 201
Los Angeles CA 90025



Robert Keatinge <robert.keatinge@lacity.org>

Belmont Village/Westwood Presbyterian Church Project

1 message

Randall Greer <randallgreer49@gmail.com>
To: robert.keatinge@lacity.org

Thu, Nov 19, 2020 at 3:02 PM

Dear Mr. Keating,

I am strongly opposed to the proposed development by Belmont Village Senior Living Centers at [10822 Wilshire Boulevard](#) and [10812 Ashton Avenue](#) on the parking lot of Westwood Presbyterian Church. It should not be allowed to go forward in its current configuration, which in addition to the Belmont facility, includes 19,567 sq.ft. of buildings for the church and its preschool.

To be clear, I am not opposed to an eldercare facility provided it is constructed in accordance with current zoning, the scenic corridor plan and a design that is not so intrusive on the surrounding neighborhood. The proposed development would introduce 200+ Belmont employees, service vehicles, visitors to the Belmont facility, school and church personnel and parents of children enrolled in an expanded preschool. Many of these persons will be coming to the facility 24/7. This extreme increase in people, vehicles and 24/7 use will overwhelm and destroy the residential atmosphere of the neighborhood.

Approving the project in its current form also sets a bad precedent. The proposed development greatly deviates from the R-1 zoning and the Wilshire-Westwood Scenic Corridor Specific Plan. To allow such major deviations from the community-inspired development guidelines will only encourage Belmont and other developers to build similar, guideline-violating projects. This will defeat the goals of the community to limit development of high-density projects and will markedly diminish the lifestyle quality of the Westwood neighborhood.

Thank you for noting my opposition to this project.

Randall Greer



Robert Keatinge <robert.keatinge@lacity.org>

Belmont Senior living project

Richard Marantz <richmarantz@gmail.com>

Tue, Dec 1, 2020 at 10:48 AM

To: robert.keatinge@lacity.org

I am a new resident in the Californian condominiums. This project goes against the corridor moratorium of 6 stories. The project has been studied and Belmont can make a profit at 6 stories. Below are some of the reasons to limit this project.

The main entrance and exit are on Wilshire Blvd with a "drop-off" area just inside the curb on Wilshire, which will cause a back-up onto Wilshire Blvd.: Visitors, deliveries (food, supplies, medications), church visitors, community meetings, employees, doctors, special services, repairs, and emergency vehicles - all along with 200 employees.

Entrance off of Ashton Ave, which dead-ends into the property. Will be used, we are told, specifically for parents to drop off and pickup (5 days a week 2X a day) 125 pre-school students, toddlers and infants between the hours of 7-8 AM. That amounts to 100+ cars arriving during a short period of time. Currently, they have a very large parking lot in which to park and walk their children inside. There will be no space at this "turn around" for parents to walk them into school with this new arrangement. There are only 5 parking spaces in front of the school.

Since it is a senior living facility, there probably will be ambulance sirens at all hours of the night.

Belmont is asking for deviations that will impact the quality of life for residents here. I urge you to stop this project.

Respectfully,

Richard Marantz

**Tabibian**

Robert Keatinge <robert.keatinge@lacity.org>

Fw: DIR-2020-3896-DRB-SPP-P;ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR;VTT-82107;ENV-2018-3423-MND;ENV-2019-5735-SCEA(10822 W. Wilshire Blvd.)

2 messages

Roya Tabibian <royatabibian@yahoo.com>

Tue, Nov 17, 2020 at 4:10 PM

Reply-To: Roya Tabibian <royatabibian@yahoo.com>

To: "robert.keatinge@lacity.org" <robert.keatinge@lacity.org>

Roya Tabibian, D.C.

(310)202-2100

royatabibian@yahoo.com

----- Forwarded Message -----

From: Roya Tabibian <royatabibian@yahoo.com>**To:** dylan.sittig@lacity.org <dylan.sittig@lacity.org>**Sent:** Tuesday, November 17, 2020, 04:08:11 PM PST**Subject:** Re: DIR-2020-3896-DRB-SPP-P;ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR;VTT-82107;ENV-2018-3423-MND;ENV-2019-5735-SCEA(10822 W. Wilshire Blvd.)

To whom it may concern,

I am enclosing signed petitions from the residents on Ashton and Wellworth Ave, whose lives will be significantly impacted in a negative fashion by this project. We oppose the zoning changes due to the increase in traffic, which will introduce a huge amount of people from a different community to our single family residential area. This will impact the safety of our residents and their children. Also, the planning did not consider the residential neighbors and the noise impact on our daily lives and work. The immediate neighbors will be affected by the noise impact of 120 loud children screaming immediately adjacent to our single family home zoning area. We demand an acoustic study done and a proper non-covid effected traffic study done for our street and adjacent neighborhood. Additionally, you are allowing a 12-story building on south side of Wilshire Blvd. when it is not allowed in other neighborhoods with single family zoning. The visibility from upper floors over our properties will dramatically compromise our privacy inside our homes. Last but not least we are very disappointed with our neighborhood council representatives since they don't live in our area and do not accurately reflect or share our concerns in this area as they are supposed to. They have nothing to lose here. We understand that there has to be some compromises, but our neighborhood should not be the only ones making sacrifices. We would like to make sure that these issues are discussed in the meeting and resolved before issuing any permits or zone changes. Thank you for your attention to this matter.

Sincerely Yours,

Roya Tabibian, D.C.

(310)202-2100

1

royatabibian@yahoo.com

 **CCF11172020_00000.pdf**
5647K

Dylan Sittig <dylan.sittig@lacity.org>
To: Roya Tabibian <royatabibian@yahoo.com>
Cc: Robert Keatinge <robert.keatinge@lacity.org>

Tue, Nov 17, 2020 at 4:29 PM

Hello,

Thank you for your comment and petition. It has been received and will be added to the Case File.

Sincerely,
Dylan

On Tue, Nov 17, 2020 at 4:08 PM Roya Tabibian <royatabibian@yahoo.com> wrote:

To whom it may concern,
I am enclosing signed petitions from the residents on Ashton and Wellworth Ave, whose lives will be significantly impacted in a negative fashion by this project. We oppose the zoning changes due to the increase in traffic, which will introduce a huge amount of people from a different community to our single family residential area. This will impact the safety of our residents and their children. Also, the planning did not consider the residential neighbors and the noise impact on our daily lives and work. The immediate neighbors will be affected by the noise impact of 120 loud children screaming immediately adjacent to our single family home zoning area. We demand an acoustic study done and a proper non-covid effected traffic study done for our street and adjacent neighborhood. Additionally, you are allowing a 12-story building on south side of Wilshire Blvd. when it is not allowed in other neighborhoods with single family zoning. The visibility from upper floors over our properties will dramatically compromise our privacy inside our homes. Last but not least we are very disappointed with our neighborhood council representatives since they don't live in our area and do not accurately reflect or share our concerns in this area as they are supposed to. They have nothing to lose here. We understand that there has to be some compromises, but our neighborhood should not be the only ones making sacrifices. We would like to make sure that these issues are discussed in the meeting and resolved before issuing any permits or zone changes. Thank you for your attention to this matter.

Sincerely Yours,

Roya Tabibian, D.C.

(310)202-2100

royatabibian@yahoo.com



Dylan Sittig
City Planning Associate
Los Angeles City Planning
200 N. Spring St., Room 720
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1197

Please Sign & drop in mail box at
10813 Wellworth Ave

SUPPORT THE WESTWOOD SPECIFIC PLAN

Thanks
Roya

Westwood neighbors for sensible growth is a new community-based coalition which has come together in response to concerns about the proposed Belmont Senior Living project. Belmont Senior Living wants to violate Zoning and Building height restrictions on Wilshire Blvd. in the name of more profits at our community's expense. They also plan to move their preschool into a residential zone with expensive child care from 7 am to 6pm.

Plan to build a 153-foot-tall project which is more than double the maximum allowed in the specific plan

-It will have a huge impact on the traffic on our streets and reduce the value of our homes.

-Belmont's application and rendering are misleading to the public

-Violation of the R1 zoning law which is only allowed for residential homes and not a business.

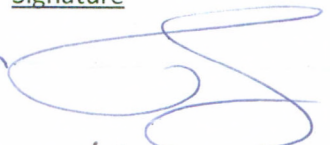
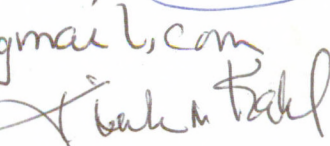
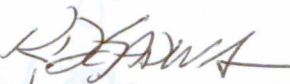
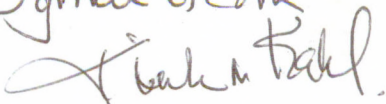
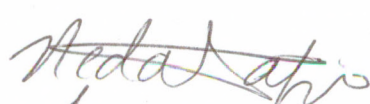
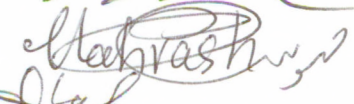
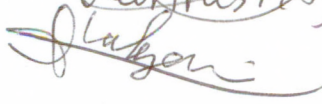
By signing the petition below I agree that I support the Westwood Specific Plan and oppose the Belmont project as proposed.

Name

Address

email

Signature

Paul Soroudi	10716 Ashton Ave	Paul@convercare.com	
Kimber Kabeil	10809 Wellworth Ave	Kimber.Kabeil@gmail.com	
GADWA	10840 WELLWORTH AVE.		
Jennie Gadwa	10840 Well worth ave		Jennie Gadwa
Mary E Loberg	10793 Wellworth Ave	LA	
Lawrence Karasek	10787 Wellworth Ave. 90024	Lawrence Karasek	
Kristina Loberg	10787 Wellworth Ave. 90024	Kristina@kristinloberg.com	
STEVEN CORRA	10777 Wellworth Ave		
Neda Roshani	10773 Wellworth Ave.		
Anonymous	10763 Wellworth Ave		
Amir Roshani	10773 Wellworth Ave		
Mahvash Lalezari	10773 Wellworth Ave		
Nasser Robert Lalezari	1405 Manning Ave #101		
Nura DS	10758 Wellworth Ave		

SUPPORT THE WESTWOOD NEIGHBORHOOD PLAN

Westwood Neighbors for Sensible Growth is a new community-based coalition, which has come together in response to concerns about the proposed Belmont Senior Living project on the grounds of Westwood Presbyterian Church. Belmont Senior Living wants to violate Zoning and Building height restrictions created to protect our neighborhood. They also plan to move their preschool into a residential zone with childcare from 7 am to 6pm.

-Plan to build a 153-foot-tall project that is more than double the maximum allowed in the specific plan

-Huge impact on the traffic on our streets and will likely reduce the value of our homes.

-Belmont's application and rendering are misleading to the public

-Violation of the R1 zoning law which is only allowed for residential homes and not a business.

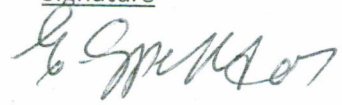
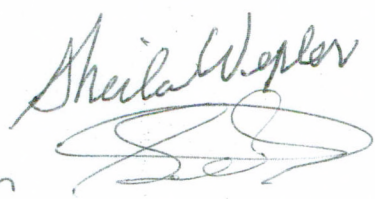
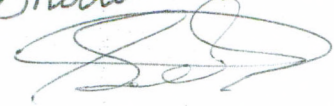
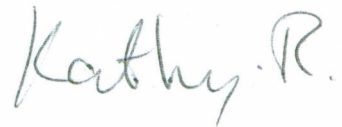
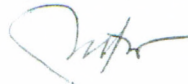
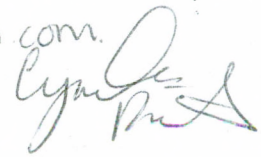
By signing the petition below I agree that I support the Westwood Specific Plan and oppose the Belmont project as proposed.

Name

Address

email

Signature

- 1) ELENA 1762 Westwood Blvd .
SPEKTOR 
- 2) Sheila Wexler 
- 3) Mino Sedi 1762 Westwood Blvd. Sedihi@gmail.com 
- 4) Liza Chio 1762 Westwood Blvd liza.chio@yahoo.com 
- 5) Kathy Rad 1762 Westwood Blvd. Kathy.R.
(Kutayoun) 
6. Doug / Ceiff 176  Ashton Ave, LA 9024
7. Adriano Pantino 1762 Westwood Blvd. 
8. Cynthia Rivas Rivas.Cynthia1024a6@gmail.com 

SUPPORT THE WESTWOOD SPECIFIC PLAN

Westwood neighbors for sensible growth is a new community-based coalition which has come together in response to concerns about the proposed Belmont Senior Living project. Belmont Senior Living wants to violate Zoning and Building height restrictions on Wilshire Blvd. in the name of more profits at our community's expense. They also plan to move their preschool into a residential zone with expensive child care from 7 am to 6pm.

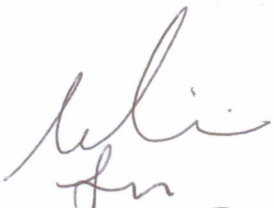
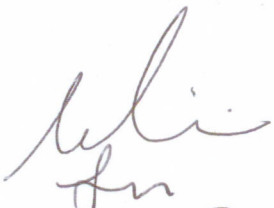
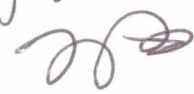
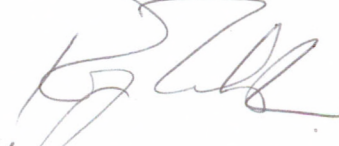
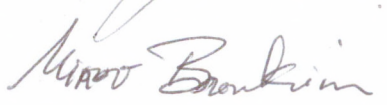
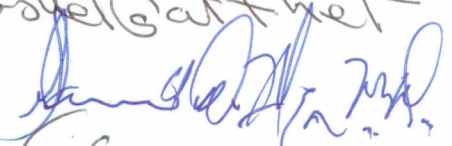
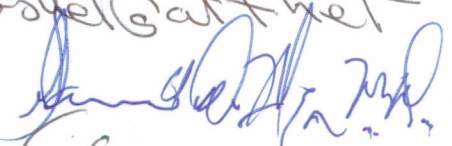
Plan to build a 153-foot-tall project which is more than double the maximum allowed in the specific plan

-It will have a huge impact on the traffic on our streets and reduce the value of our homes.

-Belmont's application and rendering are misleading to the public

-Violation of the R1 zoning law which is only allowed for residential homes and not a business.

By signing the petition below I agree that I support the Westwood Specific Plan and oppose the Belmont project as proposed.

Name	Address	email	Signature
BOSSAN JEDDIKAR	1762 Westwood L.A CA 90024	delbare@yahoo.com	
2) Mehran Khalili	11901 Santa Monica Blvd #470, CA, CA 90225	@Shahin	
3) Lidia Monzon	1660 Rockwood St LA CA 90024	lidia18-Monzon @yahoo.com	
4) Tashana Elzy		tmprus1@gmail.com	
5) Alize Woods		calistyleb@gmail.com	
6) Roya Tabibian	10813 Wellworth Ave, LA 90024	royatabibia@yahoo	
7) Mineo Brankhim	535 Chalette Dr. B.H, 90210		
8) Monica Luna		Demonice.luna@gmail.com	
9) Mitra Gouel		MitraGouel@att.net	
10) Dr. Garret Herzon	10817 Wellworth Ave, LA 90024		
11) Kemran Brankhim M.D.	535 CHALETTE DRIVE, B.H.		
12) Michael Brankhim	#401		

SUPPORT THE WESTWOOD SPECIFIC PLAN!

Westwood Neighbors for Sensible Growth is a new community-based coalition which has come together in response to concerns about the proposed Belmont Senior Living project. The Specific Plan represents a pact between the City and its residents.

Belmont Senior Living wants to violate our Specific Plan in the name of more profits, at our community's expense.

- Plan to build a 153-foot-tall project, more than double the maximum height allowed in the Specific Plan.
- Projects that double, triple or quadruple the height and density allowed, like the Belmont project, are going to have outsized and unnecessary impacts on residents and commuters.
- Belmont's application and renderings are misleading to the public.

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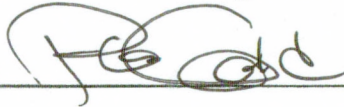
1. Print Name Sondra Vazirani Address 10823 Wellworth Ave City & Zip Code LA 90024

Phone 310-824-7479 EMAIL SONDRA8@gmail Signature X 

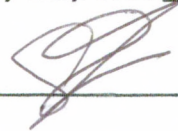
2. Print Name Elizabeth Gold Address 10824 Wellworth Ave City & Zip Code LA 90064

Phone 702-767-9390 EMAIL e811c8@hotmail.com Signature X 

3. Print Name Don Gold Address 10824 Wellworth Ave City & Zip Code LA 90064

Phone 310-779-7888 EMAIL dgoldrocks@yahoo.com Signature X 

4. Print Name Sandy Sinanian Address 10825 Wellworth Ave City & Zip Code LA, CA 90024

Phone 310-749-0090 EMAIL sandysinanian@gmail.com Signature X 

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1. Print Name FERESHTEH NOSRATIAN Address 10844 WELLWORTH AVE City & Zip Code 90024

Phone 310-470-1231 EMAIL FNOSRATIAN@yahoo.com Signature X F. Nosratan

2. Print Name SUSAN MARTIN Address 10848 Wellworth City & Zip Code 90024

Phone 310.474.0404 EMAIL ohsuzequ@yahoo.com Signature X S. Martin

3. Print Name ANTONIO BRAGA Address 10852 Wellworth Ave City & Zip Code 90024

Phone 310-446-3858 EMAIL BRAGAACH@GMAIL.COM Signature X [Signature]

4. Print Name FRANK DEBILLO Address 10816 Wellworth City & Zip Code 90024

Phone _____ EMAIL _____ Signature X [Signature]

SUPPORT THE WESTWOOD SPECIFIC PLAN!

Westwood Neighbors for Sensible Growth is a new community-based coalition which has come together in response to concerns about the proposed Belmont Senior Living project. The Specific Plan represents a pact between the City and its residents. Belmont Senior Living wants to violate our Specific Plan in the name of more profits, at our community's expense.

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1. Print Name Ellen Kuwana Address 6842 2nd Ave NE City & Zip Code Seattle 98115

Phone 206-963-0997 EMAIL ellen.kuwana@gmail.com Signature X Ellen Kuwana

2. Print Name Sharda Spitz Address 10823 Wellworth Ave City & Zip Code Los Angeles 90024

Phone 310-824-7479 EMAIL sharda.spitz@gmail.com Signature X Sharda Spitz

3. Print Name Leila B Chaffee Address 10823 Wellworth Ave City & Zip Code Los Angeles, CA

Phone 313-375-8485 EMAIL leila.b.chaffee@gmail.com Signature X Leila

4. Print Name H.N. VAZIRANI Address 133 Cottonwood Circle City & Zip Code R.H.E. 90274

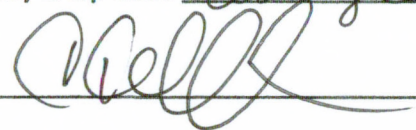
Phone 310-372-2453 EMAIL HNVAZIRANI@aol.com Signature X HN Vazirani

SUPPORT THE WESTWOOD SPECIFIC PLAN!

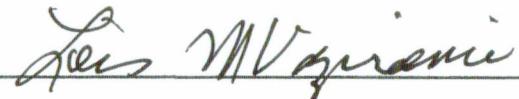
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1. Print Name Cristina Colissino Address 10841 Wellworth Ave City & Zip Code Los Angeles, CA 90024
Phone 310-951-2995 EMAIL Colissino@gmail.com Signature X 

2. Print Name Vicki Schiller Address 10841 Wellworth Ave City & Zip Code LA 90024
Phone 310 880-4478 EMAIL Schillera1@aol.com Signature X 
133 Cottonwood Circle Rolling Hills Estates

3. Print Name Lois M. Vazirani Address Ro City & Zip Code CA 90274
Phone (310) 377-3453 EMAIL loisvaz37@gmail.com Signature X 

4. Print Name _____ Address _____ City & Zip Code _____
Phone _____ EMAIL _____ Signature X _____



Los Angeles City Planning Department

200 North Spring Street, Los Angeles, CA 90012

WEST LOS ANGELES AREA PLANNING COMMISSION JURISDICTION Westwood Community Design Review Board PUBLIC HEARING NOTICE

Board Members:

James Grant, Board Chair	Julia Shuart, Board Member
Bob Mirdamadi, Board Vice Chair	Shelby Roos-Grayeli, Board Member
Adam Moos, Board Member	Gene Fong, Board Member
Alex Wuo, Board Member	

Date: Wednesday, November 18, 2020 **Place:** In conformity with the Governor's Executive Order N-29-20 (March 17, 2020) and due to concerns over COVID19, the Design Review Board meeting will be conducted entirely telephonically.
Time: 6:00 PM

Instructions for access via computer:

<https://tinyurl.com/yy3ky4ml>

Webinar ID: 848 1607 0418

Password: 801840

Go to link above and enter the password when prompted. You may also access the meeting via www.zoom.com and entering the Webinar ID and password when prompted. If you have the correct software installed, you can join by entering the Webinar ID and password from the Zoom application.

OR join via telephone:

US: +1 669 900 9128 or +1 213 338 8477

Webinar ID: 848 1607 0418

Dial one of the phone numbers listed above. You will be asked for a Webinar ID, enter "848 1607 0418" followed by "#" (pound sign). You will be asked to enter a participant ID, enter "#" (pound sign) to continue. Then you will then be joined into the webinar.

Agenda

- 1 Call to Order
- 2 Review of Agenda

Agenda items may be taken out of the order listed.

All Written Submissions and Presentation Materials, including this Agenda, are available for viewing at: <https://tinyurl.com/ycprybe6>. Additional case information can be found at <https://planning.lacity.org/pdiscaseinfo/>.

If you are interested in speaking on an Agenda Item or being placed on the Interested Parties list for any of the items on the Agenda please fill out the following form: <https://tinyurl.com/y5c8hnat>

If you are unable to download or access any of these documents, please email planning staff at dylan.sittig@lacity.org.

- 3 Public Hearing

- a. DIR-2020-3896-DRB-SPP-P; ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR; VTT-82107; ENV-2018-3423-MND; ENV-2019-5735-SCEA (10822 W.



Robert Keatinge <robert.keatinge@lacity.org>

Westwood project

Sahar Manavi <saharmanavi@hotmail.com>

Tue, Dec 1, 2020 at 11:18 AM

To: "robert.keatinge@lacity.org" <robert.keatinge@lacity.org>

Case Number: ENV-2019-5735-SCEA**Related Case Number:** ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR, VTT-82107**Council District:** 5 - Koretz**Community Plan Areas:** Westwood**Project Location:** 10822 W. Wilshire Boulevard and 10812 W. Ashton Avenue, Los Angeles, CA 90024

Mr Keating,

While I welcome the idea of additional housing, especially for seniors, in this area, I think this project is too massive as its currently planned.

- The main entrance and exit are on Wilshire Blvd with a "drop-off" area just inside the curb on Wilshire, which will cause a back-up onto Wilshire Blvd.: Visitors, deliveries (food, supplies, medications), church visitors, community meetings, employees, doctors, special services, repairs, and emergency vehicles - all along with 200 employees.

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As Wilshire is a major boulevard and blocking it from the traffic dropping off and picking up, is unacceptable. I believe in addition to traffic, car accidents will also be more frequent.

Please reconsider the size and scope of the plans.

Thanks

Sahar Manavi
310.383.7323



Robert Keatinge <robert.keatinge@lacity.org>

Re: Belmont Project Wilshire Blvd

1 message

Dylan Sittig <dylan.sittig@lacity.org>
To: Trena Greitzer <tsg2222@icloud.com>
Cc: Robert Keatinge <robert.keatinge@lacity.org>

Thu, Nov 19, 2020 at 5:06 PM

Hi Trena,

Thank you for your comments. My colleague Robert Keatinge, copied here, is the assigned Project Planner for the case and will add your comments to the case file.

Sincerely,
Dylan

On Thu, Nov 19, 2020 at 9:45 AM Trena Greitzer <tsg2222@icloud.com> wrote:

Dear Dylan,

After speaking last night and hearing all the other pro and cons, no one addressed, including me, another major problem with the design.

The Belmont has not included a separate receiving entrance for all the deliveries and exits.

Therefore, they are expecting all the trucks, etc to park on Wilshire Blvd, Malcolm or Ashton.

This is a major problem as that will congest and slow up traffic more than anything.

I have also included so that you can have it on record, all my thoughts from last night.

Since I was only allowed two minutes I had to cut out the part about deliveries which I should have included.

I was born and raised in West Los Angeles, and went to school here locally and to UCLA so I am very familiar with the area

I have seen the growth and development on Wilshire Blvd

The Belmont is not adhering to the zoning regulations of 6 stories, maximum 75' along Wilshire Blvd.....

The Belmont Plan would set the wrong example and precedent for the entire Westwood neighborhood.

The traffic going east on Wilshire Blvd would back up..... when vendors and residents and staff try to enter and leave.

And, There is not adequate parking on the street for all the services that are required to maintain this facility especially when you are doubling the current size limit that is allowed.

There will be double the amount of trucks and vendors that they will need..... The extra 6 floors will mean more extra deliveries vehicles, vendors, moving vans, disposable waste trucks, and additional repair trucks, all coming and going.

There just is not enough curb space. The large Ups Trucks, movers will not be able to park in the Belmont building garage as there is not the height required and enough space for the vehicles to turn around.

Consequently they would try to park on Wilshire and then the over flow would park on Malcolm, and mostly Ashton as there is not enough parking on Wilshire Blvd.

The Belmont keeps on saying that there is a need for elder care. Which is the reason they are trying to get around the 6 story limit.

But just a few blocks north in Westwood The Watermark at Westwood village will be opening with 188 units for exactly the same type of care, deluxe units for assisted, independent and memory loss facilities.

Keep to the allowed height and let them build a 6 story facility.

Yours Sincerely,

Trena Greitzer
tsg2222@icloud.com



Dylan Sittig
City Planning Associate
Los Angeles City Planning
200 N. Spring St., Room 720
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1197





Robert Keatinge <robert.keatinge@lacity.org>

Case No.ENV-2019-5735-SCEA

Alfred Chan <alfred.chan@stefanorizzi.com>

Sat, Dec 5, 2020 at 2:27 PM

To: "robert.keatinge@lacity.org" <robert.keatinge@lacity.org>

Dear Mr. Keatinge,

I hope you and family are safe and well during this most difficult Pandemic time!

The reason that I am writing you is because I live directly across from Belmont Village Senior Living on 12th floor of The Blair House knowing that Belmont Village is asking the City to approve and to allow them to add 10 stories to their existing building.

I am a 75 years old working man with my wife living across the street for many years and regret it since day one! After we bought the unit, everyday we could only open a small crack of the windows and balcony doors because of the poisonous polluted air on Wilshire corridor caused by the non-stop 24 hours of heavy traffic every day! As you know, exposure to air pollutants are fatal to elderly for chronic obstructive pulmonary disease, chronic bronchitis, asthma & emphysema etc.while everyone is susceptible to carbon monoxide poisoning as well, especially to the elderly!! Knowing about these detrimental possibility, my wife and I have been looking for cleaner-air place to move to for years. We used to live in Palos Verdes and wanted to move back there but it is very difficult because my work place is in Beverly Hills; too far and long distance for driving every day! Therefore, we have no choice but keep looking and thinking of retirement every minute because where I live now is very beautiful and luxurious but too dangerous for our health!! If I retired, I would definitely sell my unit and move right away!!

I feel so sorry and don't understand why those well to do retired seniors choose to live in such an unhealthy, noisy and harmful environment if they don't have to live nearby to go to work. They could not even seat outside the swimming pool area without risking of breathing in too much harmful carbon monoxide, emission from the constant passing cars! Whenever we heard ambulance, fire engines sirens and looked out. They were always stopped at Belmont!!! How sad and disheartening knowing that some of them must be suffering or dying affecting by the ailments mentioned above! Instead of taking a chance of catching the fatal diseases living there, they should be living in cleaner and have plenty of fresh air area. If you were their sons/daughters, I think you would definitely tell them to live somewhere else to persevere and prolong their lives instead of shortening them!!!

I would conclude my sentiment here and let you decide whether Belmont should build and add another 10 stories for more rooms to house more seniors to harm them!!!

My best,
Alfred

Ref: ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR,VTT-82107

Council District: 5 - Koretz

Community Plan Area: Westwood

Project Location: 10822 W. Wilshire Blvd. and 10812W. Ashton Ave, L.A,CA 90024

Sent from my iPad

Alfred Chan
PRESIDENT

Stefano Ricci Beverly Hills

270 North Rodeo Drive
Beverly Hills CA 90210- United States
Tel. +1 (310) 858-9595

www.stefanoricci.com

Le informazioni contenute nella presente comunicazione e i relativi allegati possono essere riservate e sono, comunque, destinate esclusivamente alle persone o alla Società sopraindicati. La diffusione, distribuzione e/o copiatura del documento trasmesso da parte di qualsiasi soggetto diverso dal destinatario è proibita, sia ai sensi dell'art. 616 c.p., che ai sensi del D.Lgs. 196/2003. Se avete ricevuto questo messaggio per errore, Vi preghiamo di distruggerlo e di informarci immediatamente.

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Robert Keatinge <robert.keatinge@lacity.org>

Belmont Project

Barbara Herman <bherman925@gmail.com>

Tue, Dec 1, 2020 at 12:48 PM

To: robert.keatinge@lacity.org

Case Number: ENV-2019-5735-SCEA**Related Case Number:** ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR, VTT-82107**Council District:** 5 - Koretz**Community Plan Areas:** Westwood**Project Location:** 10822 W. Wilshire Boulevard and 10812 W. Ashton Avenue, Los Angeles, CA 90024

Dear Sir,

I am a resident living on Wilshire Blvd.

The Belmont project is asking for a variance for a 12 story building where only 6 stories are allowed.

The main entrance will be on Wilshire with cars coming and going all day and night.

Delivery of food, supplies, and medications will arrive there as well as employees (200). I am concerned that accidents will happen to cars and people.

The nursery school entrance will be on Ashton. The majority of people drop their children off between 7:00 and 8:00. This means that 100+ cars will be entering on Ashton. There will be parking for 5 cars so it will be impossible for parents to walk their children, all under 5 years old, inside.

I think this project is too big and will cause too much noise and traffic.

Sincerely,

Barbara Herman

1



Robert Keatinge <robert.keatinge@lacity.org>

Case # 2019-5735-SCEA 10822 Wilshire1 message

Brian Kluft <BKluft@msn.com>

Tue, Nov 17, 2020 at 6:33 PM

To: "robert.keatinge@lacity.org" <robert.keatinge@lacity.org>

Dear Mr. Keatinge,

I would like to voice my opinion on this project. I am a neighbor at [10776 Wilshire](#) The Carlyle Residences. I am FOR this project and support every aspect of it. I had an uncle at the Belmont Village down the street and it is an incredible facility. We need more housing for all different types of circumstances.

On a side note I think it is time that the city revisit the six-story moratorium on the Wilshire corridor. We need housing and the property tax income from beautiful high rises would not hurt.

Sincerely,

Brian Kluft

1



Robert Keatinge <robert.keatinge@lacity.org>

Belmont - Westwood Presbyterian Church Project

Bryan Hsiao <naturalcomputing@att.net>

Thu, Dec 3, 2020 at 4:06 PM

To: "robert.keatinge@lacity.org" <robert.keatinge@lacity.org>

Case Number: ENV-2019-5735-SCEA

Related Case Number: ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR, VTT-82107

Council District: 5 - Koretz

Community Plan Areas: Westwood

Project Location: [10822 W. Wilshire Boulevard](#) and 10812 W. Ashton Avenue, Los Angeles, CA 90024

Dear Sir:

As a long time neighborhood resident around Westwood Presbyterian Church, I believe a creative development project like this one is helpful to both the church and the community, and beneficial to the developer as a reward for their endeavor, which is demonstrated in the nearby similar Belmont project at Warner Avenue and Wilshire Blvd.

However, the current design of facility access, drop-off, and exit for the church and senior living is a concern. It relies too much on Wilshire's traffic benevolence, but that spot proves merciless at all time.

Much quieter and spacious similar uses, in the same neighborhood, by W Hotel and Sinai Temple already show that dangers and tension can pop up when conveniently using too little own property space for access, drop-off, and exit. This new project's Wilshire traffic will be far worse. Astoria Hotel one mile down on Wilshire knows this too well.

I would suggest a combined in-and-out traffic pivot, if possible, in the underground (understand the extra cost), with ample waiting space for standing/turn-around cars. This would also avoid impacting the quiet residence neighborhood on the south side when solely using Ashton entrance for preschool.

I believe a win-win-win solution is achievable.

Bryan Hsiao, Ph.D.
[819 Manning Ave.](#)

1



Robert Keatinge <robert.keatinge@lacity.org>

10822 Wilshire Blvd project

Caron Schwartz <caronschwartz.realtor.broker@gmail.com>
To: robert.keatinge@lacity.org

Sun, Dec 13, 2020 at 10:40 AM

YOU MUST MAKE REFERENCE TO THIS INFORMATION:

Case Number: ENV-2019-5735-SCEA

Related Case Number: ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR, VTT-82107

Council District: 5 - Koretz

Community Plan Areas: Westwood

Project Location: 10822 W. Wilshire Boulevard and 10812 W. Ashton Avenue, Los Angeles, CA 90024

Dear Mr. Keatinge;

I wanted to express my opposition to this project. That's a long time 30+ your residence of the area I feel that the violation of current building restrictions it is important not to deviate from. The excessive traffic will hinder the area which is already very congested at 5o'clock every day.

The views that would be blocked from the building next-door I have definitely affected home values. I have had several clients walk away from potential purchase due to the blockage of you that may occur.

I hope you will listen to the neighbors are all affected from excessive Building heights and use of property.

Thank you for listening to the neighbors

Regards

Sent from my iPhone

Caron Schwartz/ Realtor/Broker

310-383-0831

Compass #01403163

Caronschwartz.com

thank you for your referrals of family and friends 😊



Robert Keatinge <robert.keatinge@lacity.org>

Belmont Villiage

Cynthia Finerman <cynfin18@gmail.com>

Wed, Dec 9, 2020 at 10:03 AM

To: robert.keatinge@lacity.org

re: Case number: ENV-2019-5735-SCEA

Related Case Number: ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR. VTT-82107

Council District: 5 - Koretz

Community Plan Areas: Westwood

Project Location: [10822 W. Wilshire Boulevard](#) and
[10812 West Ashton Avenue](#)
[Los Angeles, CA 90024](#)

Dear Mr. Keatinge,

This relates to the Belmont Village Senior Living Westwood 11 Project.

We are very concerned that insufficient study has been given to the effect that traffic on Wilshire Boulevard and Ashton Avenue will have, both during construction and thereafter.

We do not feel that adequate consideration has been given to the environmental effect of visitors, parents, and employees on the overall traffic in the area.

We feel that Belmont should be required to obtain an Environmental Impact Report since the traffic import on the entire neighborhood will be extremely substantial.

Further, we feel strongly that the addition of 12 stories to the existing facility is too large for the area. The project, if approved at all, should be limited to 6 stories thereby significantly reducing the impact on traffic and the environment.

Thank you for your consideration.

Cynthia and Ralph Finerman

[10490 Wilshire Boulevard, #2304](#)[Los Angeles, CA 90024](#)

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Robert Keatinge <robert.keatinge@lacity.org>

objection to 10822 Wilshire blvd. development as is planned

Dale Pincourt <dalepb2la@gmail.com>
To: robert.keatinge@lacity.org
Cc: dale pincourt <dalepincourt@gmail.com>

Tue, Dec 1, 2020 at 11:35 AM

Case Number: ENV-2019-5735-SCEA

Related Case Number: ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR, VTT-82107

Council District: 5 - Koretz

Community Plan Areas: Westwood

Project Location: 10822 W. Wilshire Boulevard and 10812 W. Ashton Avenue, Los Angeles, CA 90024

*****Please do not allow this oversized development to be approved as it is planned.

It is far too big for the lot and the location.

It is a travesty that this project seems to have had the backing of the City since the beginning, and the neighborhoods viable objections seem to be totally ignored.

Makes many wonder, why the only voices from the church (which is receiving lots of money and other values to their church) seem to be the opinions considered.

The size and scope of this building on this small lot, should never be built.

The building and whole scope need to be reduced so there is not the traffic load on Wilshire.

We do not believe that the developer cannot reduce the scope of project and make plenty of money.

***These DEVELOPERS are only interested in making much more money at the expense of the westwood neighborhood.

Yes, they should make money, but this is too large.

The increase in traffic coming out on Wilshire Blvd. will cause many deadly accidents=

*****"IT IS A KNOWN DANGER." and when a Known danger is ignored, and people are injured it does not bode well for the people who ignored the danger.

To approve it will open the city to many lawsuits.

PLEASE, Listen to our neighborhood, NOT the church members who are getting much money and values to get it built.

*****most of these church members do not live nextdoor, we do.

If we are forced to take these objections we have voiced, farther up the ladder if passed, please do not underestimate the residents of Westwood.

Thank you and please rethink the votes: Dale and Kenneth pincourt

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Robert Keatinge <robert.keatinge@lacity.org>

Case # ENV-2019-5735-SCEA

Debra Kanoff <dskanoff@gmail.com>
To: robert.keatinge@lacity.org

Sun, Dec 13, 2020 at 10:53 AM

Re: Case # ENV-2019-5735-SCEA
Related Case # ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR,VTT-82
Council District: 5-Koritz
Community Plan Areas: Westwood
Project Location: [10822 W. Wilshire Blvd.](#) and [10812 W. Ashton Ave., L.A., CA 90024](#)

My husband, Arthur, K. Huberman, M.D., and I, Debra S. Kanoff, live at [10490 Wilshire Boulevard, #1103](#) and wish to voice our objections to the above-proposed project. Among others, we have two specific objections:

First, the main entrance and exit are proposed to be on Wilshire Boulevard with a "drop-off" area just inside the curb on Wilshire. This design will certainly cause a back-up onto already-congested Wilshire Blvd. as it will be used by at least the following groups of people entering via Wilshire Boulevard: Visitors to the various locations within the proposed development, routine deliveries of food and other supplies, regular community meetings, doctors and other medical specialists, special services, repair and regular maintenance workers, emergency vehicles - all along with 200 employees.

Second, the entrance off of Ashton Avenue, which dead-ends into the property will be another source of congestion in our community which is already congested without the added portion of the project which goes beyond what that location legal permits.

Please require this Belmont project to adhere to the rules and regulations already in place for this particular proposed project site.

Thank you,
Debra S. Kanoff
Arthur K. Huberman, M.D.
[10490 Wilshire Boulevard, #1103](#)
[Los Angeles, CA 90024](#)

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Robert Keatinge <robert.keatinge@lacity.org>

Case Number: ENV-2019-5735-SCEA

Kay Waldman <kay.wnsg@gmail.com>
To: robert.keatinge@lacity.org

Sat, Dec 5, 2020 at 4

Dear Mr. Keatinge,

Yesterday I received this email from a resident who lives next door to the Belmont at [10475 Wilshire Blvd](#). She didn't feel comfortable, I guess, sending this directly to you. I have taken the liberty of sending below. She lives at The Grand Condominium. I felt you should hear this as it is not the first time I've heard complaints about Belmont not being a good neighbor.

eileen kravetz <eyecrave6@gmail.com>
to me

Dec 4, 2020, 7:42 PM (20 hours ago)

i do not know how to respond in writing. I will tell you we live next door to the Belmont and they are awful neighbors. Loud! Noisy! when I call the manager "feels our pain" and does nothing. If we realized our unit would be this loud we never, ever would have bought here.

On Tue, Dec 1, 2020 at 10:29 AM Kay Waldman <info.wnsg@gmail.com> wrote:

YOU MUST MAKE REFERENCE TO THIS INFORMATION:

Case Number: ENV-2019-5735-SCEA

Related Case Number: ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR, VTT-82107

Council District: 5 - Koretz

Community Plan Areas: Westwood

Project Location: [10822 W. Wilshire Boulevard](#) and [10812 W. Ashton Avenue, Los Angeles, CA 90024](#)

Thank you,
Kay Waldman

Kay Waldman, President

Westwood Neighbors for Sensible Growth

see our website:

neighborsforsensiblegrowth.org

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Robert Keatinge <robert.keatinge@lacity.org>

ENV-2019-5735-SCEA

jimcpacpal@aol.com <jimcpacpal@aol.com>

Sun, Dec 6, 2020 at 6:38 PM

Reply-To: jimcpacpal@aol.com

To: "robert.keatinge@lacity.org" <robert.keatinge@lacity.org>

Blair House Condominiums, Unit 1902

We object to the proposed 12 story , Eldercare Facility being "PUSHED" through without proper environmental effects.

Finding Parking is already an issue in this area even with the Covid-19 pandemic and closures of nearby worship facilities.

Adding such a high density project would be negative to all of us.

The planning seems unsafe and inadequate for drop off of the preschool students that now have a large parking lot to park and walk children safely inside.

A 6-story Belmont and smaller school/administration building is more reasonable, although still difficult for all of us to accommodate.

Wilshire Blvd as the main entrance for deliveries, visitors, doctors, special services etc. is not acceptable.

It is mandatory in all of our eyes for a complete environmental impact study with realistic research and numbers.

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**Balisteri**

Robert Keatinge <robert.keatinge@lacity.org>

10822 W. Wilshire Boulevard and 10812 W. Ashton Avenue, Los Angeles, CA 90024

Jonathan Balisteri <jonbalisteri@gmail.com>

Wed, Dec 9, 2020 at 2:18 PM

To: robert.keatinge@lacity.org, Cherise Balisteri <cheriseorganizer@aol.com>

From: Susan Mann. susan@susangkendall.com**Case Number:** ENV-2019-5735-SCEA**Related Case Number:** ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR, VTT-82107**Council District:** 5 - Koretz**Community Plan Areas:** Westwood**Project Location:** 10822 W. Wilshire Boulevard and 10812 W. Ashton Avenue, Los Angeles, CA 90024*A environmental impact report needs to be done.**The increase of traffic will be substantial on an extremely busy street**Noise levels raised to 24 hours for shift changes , food delivery, and**The company should keep the 6 story building limit as been approved for the corridor*

Sent from my iPad

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Robert Keatinge <robert.keatinge@lacity.org>

Need for an Environmental Impact Report

Karen Wurtzel <karen.wurtzel@gmail.com>
To: robert.keatinge@lacity.org

Mon, Dec 14, 2020 at 2:35 PM

Robert Keatinge
City of Los Angeles, Department of Planning

RE:

Case Number: ENV-2019-5735-SCEA

Related Case Number: ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR, VTT-82107

Council District: 5 - Koretz

Community Plan Areas: Westwood

Project Location: 10822 W. Wilshire Boulevard and 10812 W. Ashton Avenue, Los Angeles, CA 90024

Dear Mr. Keating,

I strongly feel that it is imperative that an Environmental Impact Report be required for the proposed Belmont Senior Living the Westwood Presbyterian Church Project.

The combined main entrance/exit of the proposed project is on a very busy part of Wilshire Blvd. Not only is the traffic very heavy, cars frequently exceed the speed limit so it feels like the "Wilshire Freeway." The "drop off" area for Belmont and the church is just inside the curb so a back-up is most likely to occur on Wilshire. This back-up will be in a designated bus lane. This is the entrance/exit for all visitors, emergency services, all deliveries such as food and supplies, community meetings and 200 employees.

Furthermore, the driveway entrance to the immediate adjacent building, a condominium, is approximately just 84 feet away. If there is a back-up from the proposed project/church, cars wanting to go to the condominium will have two choices: either become part of the back-up on Wilshire or, and more probably, be in the adjacent lane and then have to very quickly move into the lane to enter the condo driveway. There is a good potential for accidents to happen as cars are exiting from the Belmont /church and others are turning right into the condominium.

The part of Ashton Avenue that dead ends into the church property will be used specifically for parents for drop off and pick up of 125 preschool children. There will be minimal space (5) for the parents to walk their children inside the school. This section of Ashton is a small street. At the start of the school day and at the end of the school day it is entirely feasible that the backup is likely to extend the whole length of the street and possibly wrap around the corner onto Malcolm. Drivers often turn from Wilshire south onto Malcom as a shortcut.

The lives of children and adults are potentially at risk due to the problems created by the greatly increased traffic.

I am a concerned homeowner who resides on Wilshire Blvd.

Thank you for your consideration in this matter.

Sincerely,
Karen Wurtzel

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**Waldman**

Robert Keatinge <robert.keatinge@lacity.org>

Belmont Eldercare/Westwood Presbyterian Church Project - Re: Case Number: ENV-2019-5735-SCEA

Kay Waldman <kay.wnsg@gmail.com>

Fri, Dec 11, 2020 at 2:48 PM

To: robert.keatinge@lacity.org

Re: Case Number: ENV-2019-5735-SCEA

Robert Keatinge

Department of City Planning

RE: Case Number: ENV-2019-5735-SCEA**Related Case Number: ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR, VTT-82107****Council District: 5 - Koretz****Community Plan Areas: Westwood****Project Location: 10822 W. Wilshire Boulevard and 10812 W. Ashton Avenue, Los Angeles, CA 90024**

Dear Mr Keatinge,

There are many issues that I have with the Belmont Eldercare & Westwood Presbyterian Project. One glaring one is the fact that the developer is trying to avoid an EIR by substituting a less costly and less comprehensive SCEA, in its place.

By advocating a 12-story structure, where nothing taller than 6-stories has been built on the Wilshire Corridor since 2005, unless it was "grandfathered in". The proposed Belmont project is an affront to the neighborhood, with far too much activity on too small a footprint

The pre-school/administration building is much too large for a few reasons. Bear in mind that for all these years the Church's current pre-school has functioned quite successfully and one reason is the large parking lot has made it very easy for parents to park their cars and walk their kids to classes, then return to their cars and leave. Under the new concept the parents are expected to simply drop their child or child and infant (they are adding a daycare facility) without getting out of their cars. I understand there is a planned "turn-around" between the Belmont and the school. With 125 students arriving 5-days a week between 7-8 AM there will be at least 100 cars arriving and leaving every morning and repeating the process every evening. Since the entrance & exit is on a very short residential street (Ashton Ave.) The consequences can't help but be an unbearable traffic back-up, twice daily because they must enter and exit off of Ashton

I could go on, but I believe this should be quite adequate to illustrate just how the developers are attempting to overbuild for the lot size and configuration the current concept needs to be rejected. I would suggest that they either build a pre-school or a senior living facility or reduce the sizes of both structures.

Respectfully,

Kay Waldman

[10800 Wilshire Blvd, Los Angeles, CA 90024](#)

Kay Waldman, President
Westwood Neighbors for Sensible Growth
see our website:
neighborsforsensiblegrowth.org

**Laud**

Robert Keatinge <robert.keatinge@lacity.org>

Fwd: Case Number: ENV-2019-5735-SCEARelated Case Number: ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR, VTT-82107

LIZ LAUD <lizlaud@mac.com>
To: robert.keatinge@lacity.org
Cc: Liz Laud <lizlaud@mac.com>

Sun, Dec 13, 2020 at 9:31 PM

robert.keatinge@lacity.org

Case Number: ENV-2019-5735-SCEARelated Case Number: ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR, VTT-82107

Council District: 5 - KoretzCommunity Plan Areas: Westwood

Project Location: 10822 W. Wilshire Boulevard and 10812 W. Ashton Avenue, Los Angeles, CA 90024

Dear Mr. Keatinge,

I am a homeowner at [10790 Wilshire Blvd #706](#) in Los Angeles.

I want to oppose The Belmont building being over six stories high. They still need to do an environmental study.

Right now Wilshire Blvd is very congested in our area especially from Westwood Blvd through Malcolm street. We have huge amounts of traffic cutting down down Malcolm as a bypass street to get off Wilshire Blvd. We have a lot of car accidents at the Wilshire and Malcolm intersection. There are constant ambulances in route to and from local hospitals in the area.

I oppose the project. The noise and congestion from this project will be overwhelming. This Belmont is going to be 24/7 business with Non-stop deliveries, Food Service, Ambulances, and lets not forget a pre-school behind the Belmont. They are putting to many things in the one small Church parking lot.

Thank you for your time and consideration.

Sincerely,

Liz

Liz Laud
[10790 Wilshire Blvd #706](#)
Los Angeles, CA 90024

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Robert Keatinge <robert.keatinge@lacity.org>

ENV-2019-5735-SCEA

Rob Glushon <rglushon@lunaglushon.com>
To: Robert Keatinge <robert.keatinge@lacity.org>
Cc: Daniel Skolnick <daniel.skolnick@lacity.org>

Mon, Dec 14, 2020 at 12:51 PM

See attached letter.

Robert L. Glushon, Esq.

Luna & Glushon

16255 Ventura Boulevard, Suite 950

Encino, California 91436

Telephone (818) 907-8755

Fax (818) 907-8760

DENNIS R. LUNA

(1946-2016)

=====

This email contains information from the Law Offices of Luna & Glushon which may be confidential or protected by the attorney-client privilege and/or the work product doctrine. If you are not the intended recipient, any review, reliance, copying, disclosure, distribution or other use of information contained herein is prohibited. If you are not the intended recipient, please contact the sender and delete the original, all copies, and any attachments.



COMMENT LETTER TO SCEA 12.14.2020.pdf
126K

LUNA & GLUSHON

A Professional Corporation

DENNIS R. LUNA
(1946-2016)

16255 VENTURA BOULEVARD, SUITE 950
ENCINO, CALIFORNIA 91436
TEL: (818) 907-8755
FAX: (818) 907-8760

December 14, 2020

VIA EMAIL: robert.keatinge@lacity.org

Robert Keatinge
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
E-mail:

Re: ENV-2019-5735-SCEA/DIR-2020-3896-SPP-P/ZA-2018-3422-ELD-
CU-DRB-SPP-WDI-SPR; VTT-82107 - 10822 Wilshire Boulevard

Dear Mr. Keatinge:

Our firm represents Westwood Neighbors for Sensible Growth, a large group of residential property owners and tenants along the Wilshire Boulevard corridor and in the single-family residential neighborhood to the south regarding the proposed zoning entitlements for the above referenced Elder Care Use Facility Project ("the Project").

Inasmuch as the Project has yet to be considered by City decisionmakers, including but not limited to the Zoning Administrator, our clients reserve all rights to provide further comment to the Sustainable Communities Environmental Assessment ("SCEA").

Air Quality

The SCEA fails to consider all pertinent information as to potential impacts. Further review is required as to all potential pollutants and other emissions. In *City of Long Beach v. City of Los Angeles* (2018), the Court of Appeal held that an environmental impact report failed to set forth sufficient information to foster public participation and reasoned decision making. With respect to the cumulative air quality impacts analysis, the Court determined that the analysis

relied on deficient screening methodology and failed to discuss how a potential cumulative expansion project will affect pollutant concentrations. The City argued that CEQA does not require the quantification of air quality impacts of the potential cumulative expansion project because quantification would be impractical and unreasonable. The Court of Appeal recognized that while quantification would be time consuming, the fact that CEQA does not require quantified analyses does not mean all meaningful information on a subject can be omitted from an EIR's cumulative impacts analysis. Thus, the EIR should have made a "good faith and reasonable disclosure" of the cumulative impacts prior to approval.

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Cont.

Cultural Resources

CEQA requires analysis of whether the Project would cause a substantial adverse change in the significance of a historical resource. The sanctuary is an identified historical resource on the site. The Pierce Brothers Westwood Village Memorial Park and Mortuary (identified by the City as Westwood Village Memorial Park and designated as HCM #731) is a cemetery containing several mausoleum structures along the shared property line of the Project site's western boundary. As a designated HCM, it is therefore a historical resource pursuant to CEQA. Due to the proximity of the Project to the cemetery, the potential exists for both indirect and direct impacts to occur.

2

Geology and Soils

Further analysis is required as to potential geology and soils impacts.

3

Greenhouse Gas Emissions

Further analysis is required as to potential greenhouse gas emissions.

4

Hazards and Hazardous Materials

The Project is in a Methane Buffer Zone and the SCEA includes the general language:

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“The Project Site is also located in a methane buffer zone and thus, prior to the issuance of a building permit, the Project Site would be required to be independently analyzed by a qualified engineer, as defined in City Ordinance No. 175,790 and Section 91.7102 of the LAMC. The engineer would investigate and design a methane mitigation system in compliance with the LADBS Methane Mitigation Standards for the appropriate Project Site Design level which would prevent or retard potential methane gas seepage into the building.”

The SCEA fails to adequately consider and evaluate all potential methane impacts.

Land Use and Planning

The Project does not comply with the Wilshire-Westwood Scenic Corridor Specific Plan including but limited to its height in excess of 6 stories.

Noise

The SCEA’s conclusory finding of “less than significant impact with mitigation incorporated,” is not supported by evidence. Particularly during construction, even with the proposed mitigation measures, there are likely to be significant noise impacts during grading and construction of this proposed 12-story building.

Public Services

There are presently inadequate public services for the subject site including but not limited to emergency responders such as paramedic, fire and police. With proposed severe budget cuts, further information and evaluation of impacts are required.

Transportation

Although the SCEA finds “no impact”, the Project would substantially increase hazards at this location.

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Cont.

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Robert Keatinge
City of Los Angeles, Department of City Planning
December 14, 2020
Page 4

Mandatory Findings of Significance

The SCEA fails to consider and evaluate the cumulative impacts of the Project together with other identifiable development projects along the Wilshire Boulevard corridor.

Very truly yours,

LUNA & GLUSHON
A Professional Corporation

A handwritten signature in black ink, appearing to read "Rob Glushon", written in a cursive style.

ROBERT L. GLUSHON

cc: Daniel Skolnick, Senior Planning Deputy for Councilman Paul Koretz



Robert Keatinge <robert.keatinge@lacity.org>

Belmont

sander romick <sromick.wnsg@gmail.com>

Mon, Dec 7, 2020 at 4:22 PM

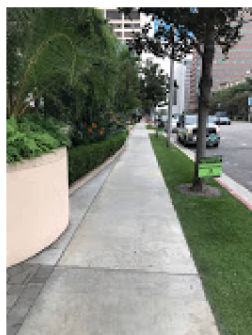
To: Robert Keatinge <robert.keatinge@lacity.org>

Please forward to appropriate party dealing with traffic. The photo was taken approximately 12:20 today 12:7 which shows the curb lane between Malcom and the bus stop Which shows 5 vehicles parked impeding traffic which Belmont construction will force construction vehicles into lane 2 thereby creating a dangerous situation on a daily basis. An accident waiting to happen

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S Romickg

Sent from my iPhone



IMG_1310.jpg
3114K



Robert Keatinge <robert.keatinge@lacity.org>

PROJECT OBJECTIONS: Case Number: ENV-2019-5735-SCEA

Shawn Goodman <shawndanagoodman@gmail.com>

Fri, Dec 4, 2020 at 5:52 PM

To: robert.keatinge@lacity.org

Case Number: ENV-2019-5735-SCEA

Related Case Number: ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR, VTT-82107

Council District: 5 - Koretz

Community Plan Areas: Westwood

Project Location: [10822 W Wilshire Boulevard](#) and [10812 W Ashton Avenue, Los Angeles, CA 90024](#)**I STRONGLY OBJECT TO THIS PROJECT:**

The main entrance and exit are on Wilshire Blvd with a "drop-off" area just inside the curb on Wilshire, which will cause a back-up onto Wilshire Blvd.: Visitors, deliveries (food, supplies, medications), church visitors, community meetings, employees, doctors, special services, repairs, and emergency vehicles - all along with 200 employees. Entrance off of Ashton Ave, which dead-ends into the property. Will be used, we are told, specifically for parents to drop off and pickup (5 days a week 2X a day) 125 pre-school students, toddlers and infants between the hours of 7-8 AM. That amounts to 100+ cars arriving during a short period of time. Currently, they have a very large parking lot in which to park and walk their children inside. There will be no space at this "turn around" for parents to walk them into school with this new arrangement. There are only 5 parking spaces in front of the school.

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Best,
Shawn Goodman
310-600-2111



Robert Keatinge <robert.keatinge@lacity.org>

ENV-2019-5735-SCEA

1 message

Sondra <sondra8@gmail.com>
 To: robert.keatinge@lacity.org

Wed, Nov 18, 2020 at 8:01 PM

Dear Mr. Keatinge,

I am writing to you to communicate my strong opposition for the currently proposed 12-story Belmont Village Senior Living Project. As you are aware, the westwood specific plan limits construction to 6-stories; the Belmont seeks to obtain an entitlement pathway via the eldercare ordinance. My concerns are:

- 1) As Belmont continues its practice to build projects on church land, it is exempt from property taxes. In this case, I cannot imagine they would not remain profitable at 6 stories; 12 stories is excessive for this site.
- 2) There is no practical way, other than posting a security guard at the Ashton entrance, that the Belmont can stop visitors, workers, and suppliers from entering the parking structure via Ashton. Community traffic and congestion will increase further. I already get honked at daily trying to exit my own driveway on Wellworth Ave.
- 3) The Belmont project requires a variance for the 12 story height, a variance for the 20k+ square foot preschool administration building located in an R1 zone in the south portion of the property, and for the Belmont to be perpendicular rather than parallel to Wilshire given the narrow rectangular land parcel.
- 4) The Belmont project on Wilshire and Warner was kept to its current size given community opposition to a taller structure, and the Holmby HOA appropriately voted to support the Belmont to 6, not 12, stories. The Westwood HOA unfortunately does not represent my interest nor the interest of my neighbors.
- 5) Attacking residents of the Californian is a poor tactic. The residents bought their condos after construction, and were not involved in the building's height determination. Ironically Attorney Armbruster, the Belmont's lawyer, represented the Californian's builders in being granted the variance.

-In summary, the "wins" here are for the church's income, the Belmont's income, and for the wealthy elderly who can afford the \$10,000 per month to live there. The losers are the Westwood residents like myself who will suffer more traffic, more noise, and reduced property values as a result. Local politics are important to local residents-- and over 1,300 people have signed petitions to oppose the Belmont's 12-stories.

Please relay my concerns to the zoning administrator.

Thank you so much,

Sondra Vazirani

10823 Wellworth Avenue

LA CA 90024

Homeowner for 10 years in Westwood

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**Goldstein**

Robert Keatinge <robert.keatinge@lacity.org>

10822 W. Wilshire Blvd/10812 W Ashton Ave, Los Angeles CA 90024

susanne goldstein <aspensuzi@gmail.com>

Tue, Dec 1, 2020 at 11:49 AM

To: robert.keatinge@lacity.org

Case Number: ENV-2019-5735-SCEA**Related Case Number:** ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR, VTT-82107**Council District:** 5 - Koretz**Community Plan Areas:** Westwood**Project Location:** [10822 W. Wilshire Boulevard](#) and [10812 W. Ashton Avenue, Los Angeles, CA 90024](#)

Both from the prospect of traffic and neighborhood impact, this project is a disaster. The need for more room and additional parking for the Belmont is dubious. The impact on Ashton, now all residential will disrupt the ambiance and lives of all. It will bring a great deal more traffic.

I am totally opposed to this project. Wilshire Boulevard has enough traffic and bustle as it is. An environmental impact study will bear my observations out.

Sincerely

Susanne H Goldstein
[416 Comstock Ave](#)
Los Angeles CA 90024

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**Barad**

Robert Keatinge <robert.keatinge@lacity.org>

Case Number: ENV-2019-5735-SCEA Related Case Number: ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR, VTT-82107 Council District: 5 - Koretz

Thomas Barad <tb@baradent.com>

Mon, Dec 14, 2020 at 11:33 AM

To: robert.keatinge@lacity.org

Dear Mr. Keating,

I am a resident of Westwood, and have lived in the area for over 20 years. I am opposed to the size of a twelve story structure and a second 20,000 square foot structure that Belmont Senior Living has submitted, to be built on a narrow parking lot [10822 W. Wilshire Boulevard](#) and [10812 W. Ashton Avenue, Los Angeles, CA 90024](#), next to the Westwood Presbyterian Church (WPC).

New construction along the Wilshire corridor has been held to a six story limit per the Westwood Specific Wilshire Corridor Plan. Belmont Senior Living itself recently built and operates one such six stories property. Given the condition of the site and the neighborhood, this new proposal should be held to the same limits.

The SCEA report does not address the actuality of living in proximity to the congestive noise, traffic and urban mass that is the current condition of Westwood. The two structures Belmont and the WPC have planned for this property have one entrance on Wilshire and the other entrance on Ashton, affecting both commercial AND residential neighborhoods. The sound and wind tunnel of Wilshire is already at nearly intolerable levels. The traffic on Ashton already impacts the homeowners on these residential streets. This plan ignores these real life factors.

I am not opposed to Belmont building a new facility, nor to the church's need for more space for its school and administrative offices. But this should be done with care and concern for those who will live with it every day. Belmont is a business, based in Texas. The church has a constituency for its school that goes well beyond Westwood's modest single family homes. It isn't right that 12 stories should be built when there is a limit of six. It isn't right that 20,000 square feet should be built in an area limited to 7,000.

There was a serious vision of the city planners who created the Specific Plan for this area. Come and visit this site. You might better understand their decision.

I have seen other schools and institutions adjust their plans to achieve their goals. Belmont did just that only four blocks east of this new site. I hope you will assist in seeing that the Belmont plan is readjusted to suit a more sensible use of this cramped and busy space.

Thank you.

Sincerely,

Tom Barad

Case Number: ENV-2019-5735-SCEA

Related Case Number: ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR, VTT-82107

Council District: 5 - Koretz

Community Plan Areas: Westwood

Project Location: [10822 W. Wilshire Boulevard](#) and [10812 W. Ashton Avenue, Los Angeles, CA 90024](#)

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Thomas K. Barad

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Robert Keatinge <robert.keatinge@lacity.org>

ENV-2019-5735-SCEA1 message

Vicki Schiller <schillerad1@gmail.com>
To: robert.keatinge@lacity.org

Tue, Nov 17, 2020 at 7:15 AM

Dear Mr. Keatinge:

I strongly oppose the Belmont Village Senior Living Westwood II project. As a homeowner since 1995, I enjoy the R1 features of our urban yet friendly neighborhood. I bought specifically because I was assured at the time that zoning on Wilshire and Westwood was 4 stories. Over time, 30 stories has been approved to shadow our homes. North of Wilshire, the neighborhood is more influential in limiting the height of new construction. The homes around the church will be negatively impacted by a 12 story building. Except for the pre school, the church is not well attended and needs the annuity that tax exempt land has allowed religious institutions to grow beyond their core mission. I can support a 4 story building, but I know that my neighbors and I are very much against another large tower looming over our backyards.

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Thank you,

Vicki Schiller
[10841 Wellworth Avenue](#)
[Los Angeles, CA 90024](#)