

II. Responses to Comments

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A. Introduction

Sections 21091(d) and 21092.5 of the Public Resources Code (PRC) and CEQA Guidelines Section 15088 govern the lead agency's responses to comments on a Draft EIR. CEQA Guidelines Section 15088(a) states that "[T]he lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments raising significant environmental issues received during the noticed comment period and any extensions and may respond to late comments." In accordance with these requirements, this section of the Final EIR provides the responses prepared by the City of Los Angeles Department of City Planning (City) to the written comments received during the comment period for the Draft EIR beginning on June 16, 2022, and ending on August 1, 2022.

Section II.B, Matrix of Comments Received on the Draft EIR, includes a table that summarizes the environmental issues raised by each commenter regarding the Draft EIR. Section II.C, Responses to Comments, provides the City's responses to each of the written comments raised in the comment letters received on the Draft EIR. Copies of the original comment letters are provided in Appendix FEIR-1 of this Final EIR.

II. Responses to Comments

B. Matrix of Comments Received on the Draft EIR

Table II-1
Matrix of Comments Received on the Draft EIR

Letter No.	Commenter	Executive Summary	Project Description	Environmental Setting	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Public Services—Libraries	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Utilities and Service Systems—Solid Waste	Utilities and Service Systems—Energy Infrastructure	Cumulative Impact	Alternatives	General/Other	CEQA	Mitigation Measures	Support	
STATE AND REGIONAL																																			
1	Miya Edmonson IGR/CEQA Branch Chief District 7—Office of Regional Planning Department of Transportation 100 S. Main St., Ste. 100 Los Angeles, CA 90012-3721		X																				X												
2	Dung Nguyen Air Quality Specialist Planning, Rule Development & Area Sources South Coast Air Quality Management District 21865 Copley Drive Diamond Bar, CA 91765					X																										X			
3	Rowena Lau Division Manager Wastewater Engineering Services Division LA Sanitation and Environment																								X							X			
ORGANIZATIONS																																			
4	Southwest Regional Council of Carpenters c/o Mitchell M. Tsai 139 South Hudson Avenue, Suite 200 Pasadena, CA 91101		X																													X			X

II. Responses to Comments

C. Comment Letters

Comment Letter No. 1

Miya Edmonson
IGR/CEQA Branch Chief
District 7—Office of Regional Planning
Department of Transportation
100 S. Main St., Ste. 100
Los Angeles, CA 90012-3721

Comment No. 1-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project includes the construction of a 15-story commercial building with 431,032 square feet of office space and 14,186 square feet of ground floor restaurant space. As part of the Project, the existing office and retail uses, and associated surface parking would be removed. Upon completion, the Project would result in a FAR of 6:1 and include 1,291 vehicular parking spaces.

The nearest State facility to the proposed project is SR 2. After reviewing the DEIR, Caltrans has the following comments:

Response to Comment No. 1-1

This introductory comment, which provides a general summary of the Project and its location relative to Caltrans facilities, is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 1-2

The Project would develop new office and commercial restaurant uses on an infill location with convenient access to public transit and opportunities for walking and biking, which would result in a reduction of vehicle trips, VMT, and GHG emissions. Specifically, the Project Site is located in a transit-rich neighborhood serviced by Metro local and rapid bus lines and LADOT regional lines. In addition, the Project Site's proximity to a variety of

commercial uses and services would encourage employees of the Project Site to walk to nearby destinations to meet their needs, thereby reducing VMT and GHG emissions.

Response to Comment No. 1-2

This general comment regarding the Project Site's location in an area with convenient access to public transit and opportunities for walking and biking, which would result in a reduction in vehicle trips, VMT and GHG emissions, is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 1-3

As provided in the Transportation Assessment on page IV.H-43-44 under Environmental Impact Analysis (IV) in the DEIR, the queue length of the US-101 NB Off-ramp to Sunset Boulevard is projected to exceed ramp capacity in the A.M. peak hour in the Future Base scenario and the Future plus Project scenario. The off-ramp consists of three lanes, with lanes #1 and #2 exiting to N. Wilton Place and lane #3 exiting to westbound Sunset Boulevard. The off-ramp intersects at westbound Sunset Boulevard is unsignalized. The Project is projected to add 15 car lengths to the queue in the A.M. peak hour. Since the Project is projected to increase the overflow onto the mainline lanes by more than two car lengths, this location required further analysis. The PeMS data showed that the average mainline speed on the US-101 NB near the Sunset Boulevard off-ramp during the A.M. peak hour is approximately 59 mph. Assuming the traffic queued on the ramp is traveling at 0 mph since the vehicles extend past the ramp length, this constitutes a potential safety issue at the US-101 NB Off-ramp to Sunset Boulevard. Therefore, the Project would result in a potentially significant impact due to additional freeway off-ramp queueing. Per LADOT's interim Guidance for Freeway Safety Analysis, operational changes have been explored to mitigate the potential safety issue at the US-101 NB Off-ramp to Sunset Boulevard.

Caltrans concurs with Mitigation Measure TR-MM-1, which would add a protected/permitted left-turn phase with reoptimized signal timing to westbound Sunset Boulevard at Van Ness Avenue. This would address the identified safety issue by partially alleviating congestion on Sunset Boulevard, that would in turn reduce the off-ramp queue onto the freeway mainline to less than what would occur under Future without Project conditions.

In reference to Page IV.H-44 of Transportation Assessment under Environmental Impact Analysis (IV) in the DEIR. It is noted that a related project in the vicinity of the off-ramp also proposes this same mitigation measure. Subject to City approval, the two projects could,

therefore, share the mitigation. If for any reason one project were to not go forward, the other project would be fully responsible for the mitigation. Caltrans is not responsible for any fair-share contribution to the mitigation.

With the incorporation of Mitigation Measure TR-MM-1, potential impacts related to the freeway ramp safety issue would be reduced to less than significant. Furthermore, the Project's design and TDM program is estimated to generate lower VMT per capita for employees than the average for the area, resulting in a less than significant VMT impact.

Response to Comment No. 1-3

This comment summarizes the Project's potential impacts to the US-101 NB Off-ramp to Sunset Boulevard and associated proposed mitigation, and is noted for the record and will be forwarded to the decision-makers for their review and consideration. Additionally, the City understands that Caltrans would not be responsible for any fair-share contribution towards the proposed mitigation measure. Further, this comment correctly summarizes that the Project design and TDM program would generate lower VMT per capita for employees compared to the average for the area.

Comment No. 1-4

Finally, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles of State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

Response to Comment No. 1-4

This comment states that any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles of State highways will need a Caltrans transportation permit, and Caltrans recommends large size truck trips be limited to off-peak commute periods. The Applicant will obtain any required permits for the Project, including from Caltrans. The recommendation to limit trips generated by large trucks to off-peak commute periods is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 1-5

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2020-03982.

Response to Comment No. 1-5

This comment concludes the letter and provides a point of contact that will be included on future public mailings for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 2

Dung Nguyen
Air Quality Specialist
Planning, Rule Development & Area Sources
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Comment No. 2-1

South Coast AQMD staff received the Draft Environmental Impact Report (Draft EIR) for the Proposed Sunset + Wilcox Project (South Coast AQMD Control Number: LAC220616-03). Staff is currently in the process of reviewing the Draft EIR. The public commenting period is from 6/16/2022 – 8/1/2022.

Upon reviewing the files provided as part of the public review period, I was able to access the Draft EIR and Appendices through the City's website.

Response to Comment No. 2-1

This comment acknowledges receipt of the Draft EIR for the Project and states that SCAQMD staff is in the process of reviewing the Draft EIR. SCAQMD also confirms that staff were able to access the Draft EIR on the City's website. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 2-2

Please provide all technical documents related to air quality, health risk, and GHG analyses, electronic versions of all emission calculation files, and air quality modeling and health risk assessment files (complete files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project as applicable, including the following:

- CalEEMod Input Files (.csv files);
- EMFAC output files (not PDF files);
- All emission calculation spreadsheet file(s) (not PDF files) used to calculate the Project's emission sources (i.e., truck operations);

- AERMOD Input and Output files, including AERMOD View file(s) (.isc);
- Any HARP Input and Output files and/or cancer risk calculation files (excel file(s); not PDF) used to calculate cancer risk and chronic and acute hazards from the Project;
- Any files related to post-processing done outside AERMOD to calculate pollutant-specific concentrations (if applicable).

You may send the files mentioned above via a Dropbox link in which they may be accessed and downloaded by South Coast AQMD staff by COB on Monday, 07/11/22. Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

Response to Comment No. 2-2

This comment requests copies of all the technical documents related to air quality, health risk, and GHG analyses, electronic versions of all emission calculation files, and air quality modeling and health risk assessment files that were used to quantify the air quality impacts from construction and/or operation of the Project. In response to this comment, all requested files were provided to the SCAQMD via a Dropbox link, as requested by the commenter. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. On July 14, 2022, SCAQMD staff confirmed receipt of the requested materials. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 2-3

If you have any questions regarding this request, please don't hesitate to contact me.

Response to Comment No. 2-3

This comment concludes the letter and provides a point of contact that will be included on future public mailings for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 3

Rowena Lau
Division Manager
Wastewater Engineering Services Division
LA Sanitation and Environment

Comment No. 3-1

This is in response to your June 16, 2022 Notice of Completion and Availability of Draft Environmental Impact Report for the proposed commercial development project located at 1420, 1424, 1426, 1428, 1432, 1432 1/2, 1434, 1436, 1438, 1440, 1450, 1452, and 1454 North Wilcox Avenue; 6450, 6460, and 6462 West Sunset Boulevard; 1413, 1417, 1419, 1425, 1427, 1433, 1435, 1439, 1441, 1443, 1445, and 1447 North Cole Place; and, 6503 De Longpre Avenue, Los Angeles, CA 90028. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification. Upon review, it has been determined the project is in the final stages of the California Environmental Quality Act review process and requires no additional hydraulic analysis.

Response to Comment No. 3-1

This comment, which lists the Project Site addresses and confirms no additional hydraulic analysis is required, is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 3-2

Please notify our office in the instance that additional environmental review is necessary for this project.

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at chris.demonbrun@lacity.org

Response to Comment No. 3-2

This comment concludes the letter and provides a point of contact that will be included on future public mailings for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 4

Southwest Regional Council of Carpenters
c/o Mitchell M. Tsai
139 South Hudson Avenue, Suite 200
Pasadena, CA 91101

Comment No. 4-1

On behalf of the Southwest Regional Council of Carpenters (“**Commenter**” or “**Carpenter**”), my Office is submitting these comments on the City of Los Angeles’ (“**City**” or “**Lead Agency**”) Draft Environmental Impact Report (“**DEIR**”) (SCH No. 2018051043) for the Sunset + Wilcox Project (SCH#:2020120005) (ENV-2020-1930-EIR) (“**Project**”).

Response to Comment No. 4-1

This introductory comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. Specific comments regarding the Draft EIR are provided and responded to below. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 4-2

The Southwest Carpenters would like to express their support for this Project. After receiving clarification and further information about this Project, SWRCC believes that this Project will benefit the environment and the local economy by utilizing a local skilled and trained workforce and will be built utilizing protocols that will protect worker health and safety.

Response to Comment No. 4-2

The comment expressing support for the Project is noted for the record and will be forwarded to the decision-makers for their review and consideration.