



WESTSIDE NEIGHBORHOOD COUNCIL
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August 13, 2021

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City of Los Angeles Department of City Planning
 Attn: Paul Caporaso
 221 North Figueroa Street, Room 1350
 Los Angeles, CA 90012
 Via email: paul.caporaso@lacity.org

**RE: Senior Residential Community at the Bellwood – Draft EIR
 10328-10384 and 10341-10381 Bellwood Avenue
 Case No. ENV-2018-7182-EIR**

Dear Mr. Caporaso:

The Westside Neighborhood Council reviewed and considered the Draft Environmental Impact Report (DEIR) for the project at 10328-10384 and 10341-10381 Bellwood Avenue at its August 12, 2021 meeting and approved a motion to submit the comments contained in this letter regarding the DEIR.

We request that the follow issue areas as discussed below be addressed further in the DEIR.

Aesthetics - Light and Glare

The DEIR does not adequately analyze light and glare impacts on the surrounding single-family residential community to the south, west and southeast of the project site. Further it does not propose mitigation measures that should be required to control light and glare impacts during nighttime hours on the surrounding single-family residential community to the south and west and even towards the guest rooms of the two adjacent hotels. A mitigation measure should be included that requires all exterior lights in outdoor areas and on the exterior of the building be shielded to direct light downward. As discussed under the Noise section below, outdoor nighttime activities should be limited in the evening hours to 10 pm in order to limit impacts to the surrounding single-family residential neighborhood. An additional mitigation measure should also be required so that once outdoor nighttime activities cease, nighttime exterior lighting,

particularly on the upper terraces and outdoor plazas (3rd, 4th, 5th and 6th levels), should be limited to the use of ground level bollards (maximum 2 feet in height) for wayfinding and safety purposes.

Noise and Air Quality Impacts

Although Project Design Feature NOI-PDF-5 regarding outdoor amplified sound systems is provided to limit the decibel level of the outdoor amplified sound based upon a particular distance from the sound, it does not address that the impact of the sound could be further mitigated by limiting the hours when outdoor amplified sound systems can be used. A mitigation measure should be required to prohibit outdoor amplified sound between the hours of 10 pm and 8 am daily to further reduce impacts to the existing surrounding residential neighborhood.

Rooftop equipment is not addressed in the DEIR and a roof plan is not provided as part of the project plans and must be provided and addressed. Rooftop equipment appears to be shown on a conceptual rendering (DEIR Figure II-12) on the roof in the 5th level terrace on the east wing and on the 6th floor rooftop in the middle wing that are closer to the southern property line than is necessary. All rooftop mechanical equipment (air conditioning units, etc.) should be located as far away from the southern property line as possible and as close to the Bellwood Avenue side of the building to minimize noise impacts. This should be required as mitigation of noise impacts on the single-family residential neighborhood in addition to noise buffering materials and screening of the equipment in addition to Project Design Feature NOI-PDF2.

In order to minimize construction noise as well as air quality impacts, mitigation measures should be added to the DEIR to prohibit idling of construction equipment not in use. Additionally, sound blankets should be required with equipment to muffle and minimize noise impacts. Further, appropriate mitigation measures should be added that prohibit construction trucks from using local residential streets, or waiting and idling on local residential streets.

Population and Housing

The DEIR analysis in the Population and Housing Chapter asserts that the impact regarding the displacement of the existing 112 housing units with an estimated 252 residents is less than significant. We believe that the analysis needs to be revised and that the impact is not less than significant. Furthermore, we believe that the impact of displacing the current residents should require mitigation for additional relocation assistance above and beyond the requirement of the RSO and Ellis Act requirements. The existing units are studio and 1 bedroom units approximately 275 to 375 square feet in size. These units are not age restricted and serve the general population.

Part of the DEIR assertion is based upon the project population of 192 eldercare units/guest rooms for seniors over age 62 who will occupy the

proposed eldercare facility for the site would have a greater number of housing units/guest rooms and occupants. The DEIR also makes the assumption that the seniors that move into the proposed eldercare facility would free up other housing. **This assumption that seniors moving into the eldercare facility would free up housing for the existing multi-family residential housing on-site is not necessarily true and needs to be re-evaluated.** First of all, many of these seniors may already live with other family members particularly if they are moving into assisted living or memory care facilities that would not free up any housing. Secondly, while the eldercare facility would provide a much needed service for seniors, it does not equate in any way with replacing housing for the general population, particularly not affordable housing.

Land Use

As discussed above in the Population and Housing section of this letter, the provision of 192 eldercare housing units does not offset the impact of displacing the residents of 112 non-age restricted housing units for the general population. Therefore, this project does not meet Objective 1-4 to “Ensure new housing minimizes displacement of residents” unless additional mitigation is required to assist in the relocation of the existing residents who reside in the existing 112 housing units on site. Additionally, this project does not comply with Policy 1.4-2 “To promote adequate and affordable housing and increase its accessibility to meet a segment of the population especially students and senior citizens.” unless the project proposes to limit some of the eldercare units to meet Los Angeles County housing affordability criteria. This should be considered if possible and discussed in the DEIR.

Alternatives Analysis

The alternatives analysis **should provide** a more detailed discussion and analysis of a reduced eldercare project alternative. The DEIR discarded a reduced size development project as infeasible because construction noise and vibration impacts would not be reduced to less than significant, however, it does not discuss any differences in operational impacts of a reduced size eldercare project that would still provide senior housing.

Additionally, the “Attachment C Eldercare Facility Unified Permit Process Additional Information/Findings” does not adequately discuss the feasibility of a reduced size project. Page 4 of Attachment C states that the allowable FAR for the Property of 2.35:1 “poses a significant practical difficulty and an unnecessary hardship by limiting development to approximately 213,181 square feet”, however it does not provide a detailed explanation as to why a 213,181 square-foot size project creates a hardship. We believe a more detailed explanation should be provided with supporting documentation as to the infeasibility.

We appreciate consideration of the comments raised and **a** response to questions raised in this letter. **This letter does not indicate support of or opposition to the Project. It is focused exclusively on the sufficiency of the**

Draft EIR.

Please keep us informed of future meetings and hearings associated with this matter during all phases of future consideration.

Please do not hesitate to contact us with any questions.

Sincerely,

Terri Tippit, Chair
Westside Neighborhood Council

Cc: Councilman Paul Koretz, CD5 (paul.koretz@lacity.org)
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Attachment: August 12, 2021 Westside Neighborhood Council Motion
Regarding Draft EIR for the Senior Residential Community
At the Bellwood (Addresses: 10328-10384 and 10341-10381
Bellwood Avenue; Case No. ENV-2018-7182-EIR)