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Sent By Email: Nuri.Cho@lacity.org

Nuri Cho, Planner
Department of City Planning
200 N. Spring St., Room 750
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Re: 1130 S. Hope Street
ENV 2020-3657-EAF, ZA 2020-3656 TDR ZAA SPR

Dear Ms. Cho:

This letter is sent to request that the referenced application be studied by a full environmental impact report (“EIR”). The project includes many deviations from the Downtown Design Guide which directly affect public safety. There are traffic hazards presented by overuse and dangerous design of the project’s alley entrances. The overuse and improper design of the alley entrances will result in idling vehicles and air quality and potential health impacts to the many nearby residents.

1. The Inadequate Setback from Hope Street Has Potentially Significant Impacts.

Because the building is pushed so much further toward Hope Street than its neighbor, Luma, it will block views, narrow the sidewalk, and provide only very limited sight distance for cars using the adjacent public alley. Because the adjacent alley is already heavily used, this limitation of sight distance adds a potentially significant element of danger for the neighborhood.

Rather than matching the prevailing setback from Hope Street from that is defined by Luma, the project is thrust 3’ further to the street frontage. This aspect is directly contrary to the recommendation of the Downtown Design Guide:

Match the prevailing setback where appropriate. (Downtown Design Guide, p. 15.)

2. The Hope Street Frontage Design Has Potentially Significant Impacts.

The proposed design flagrantly disregards multiple important aspects of the Downtown Design Guide. First, it is indeed a monolithic slab-like structure that is supposed to be discouraged:

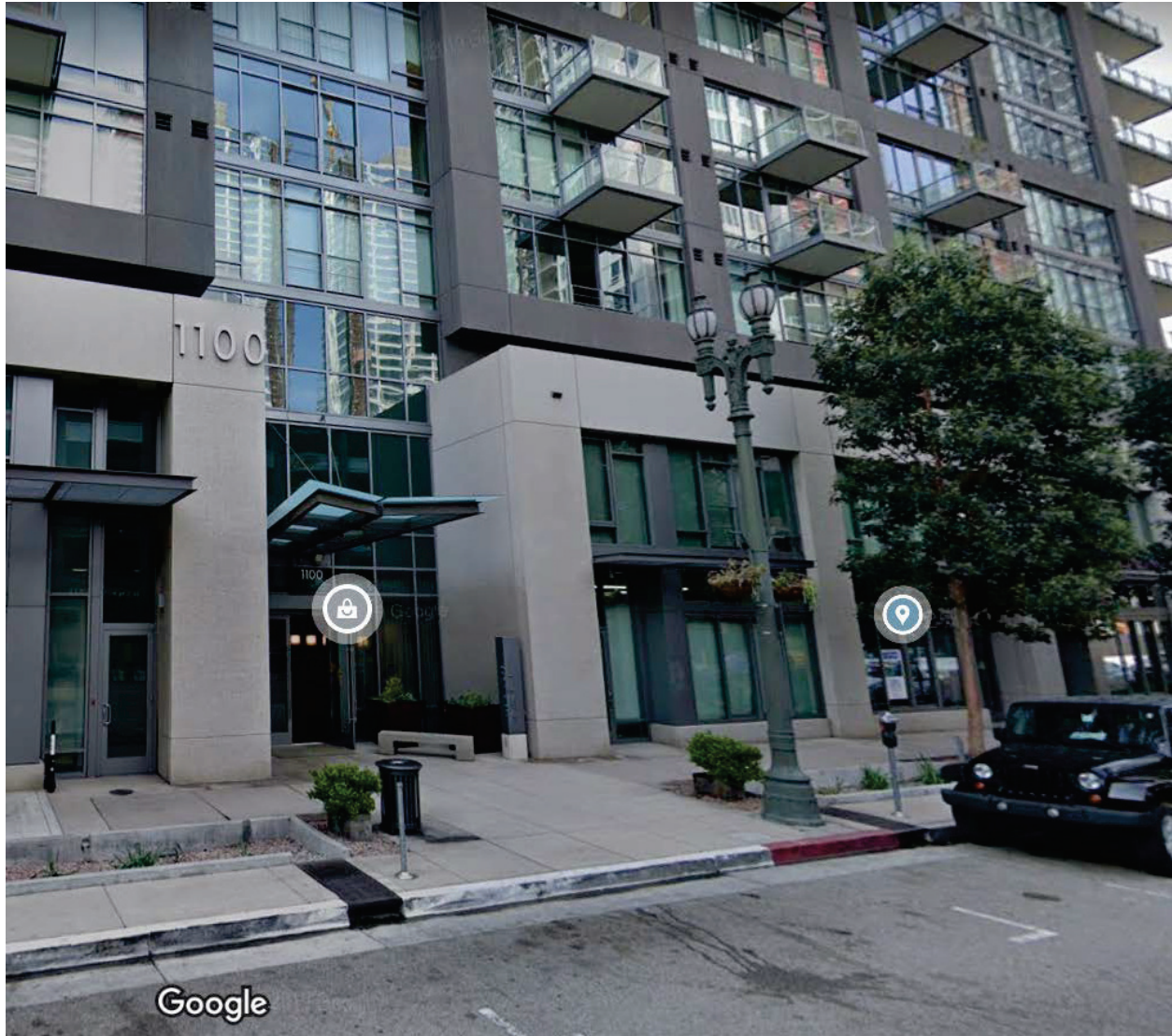
Monolithic slab-like structures that wall off views and overshadow the surrounding neighborhood are discouraged. (Downtown Design Guide, p. 26.)

Second, the frontage clearly displays two levels of ugly parking, that are clearly distinguishable as such, immediately above the ground level. The Downtown Design Guide discourages such design. Instead, the Guide provides that **habitable** uses should be immediately above the ground floor in order to provide “eyes on the street,” a public safety issue to the community:

Parking, loading or circulation located above the ground floor shall be 1) lined by habitable floor area along all street frontages or, 2) if the project sponsor demonstrates that it is not feasible to line the parking with habitable space above the ground floor, integrated into the design of the building façade. (Downtown Design Guide, p. 20.)

Here, the project applicant has made no showing whatever that it is not feasible to line the entire Hope Street frontage with habitable space above the ground floor street frontage.

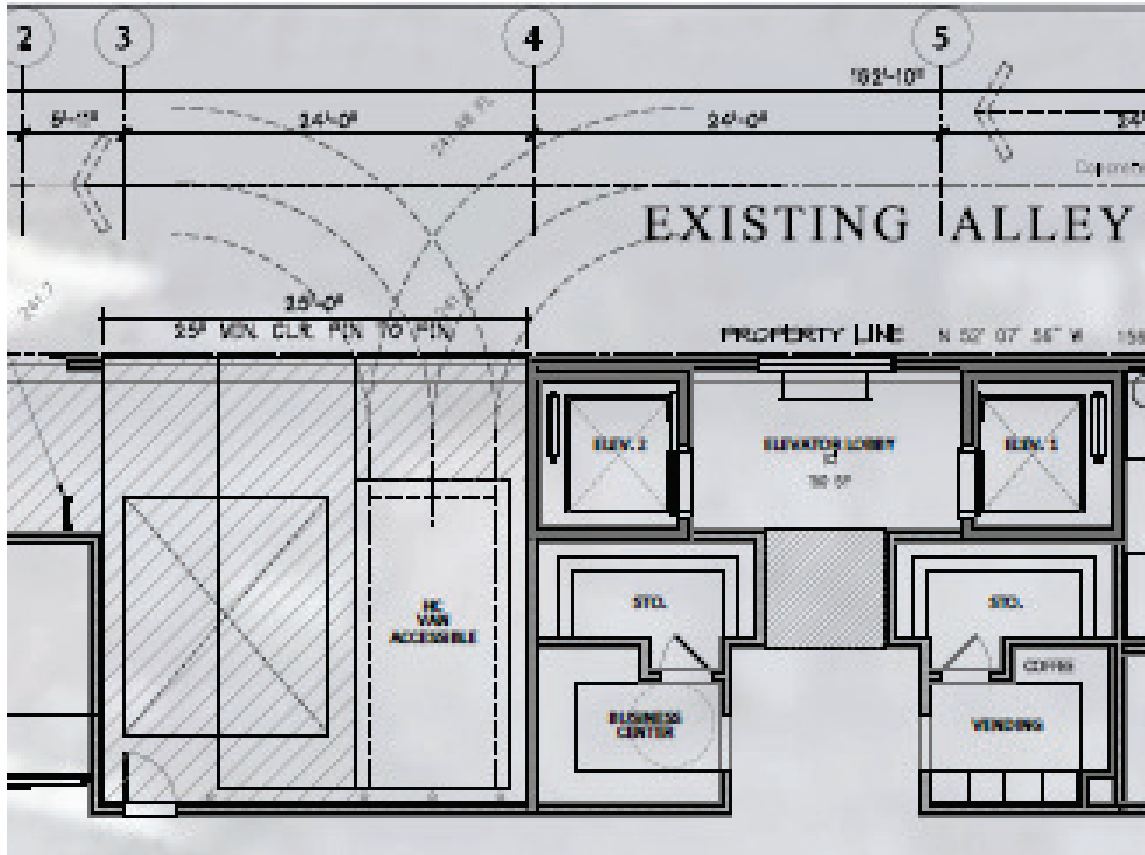
Luma has faithfully adhered to the policy of “eyes on the street’ with its Hope Street frontage:



The Project therefore presents potentially significant adverse environmental impacts to the neighborhood because of its multiple failures to comply with the Downtown Design Guide.

3. The Project Design Incorporates Multiple Blind Back-Outs Into the Alley and Unworkable Vehicle Travel Paths.

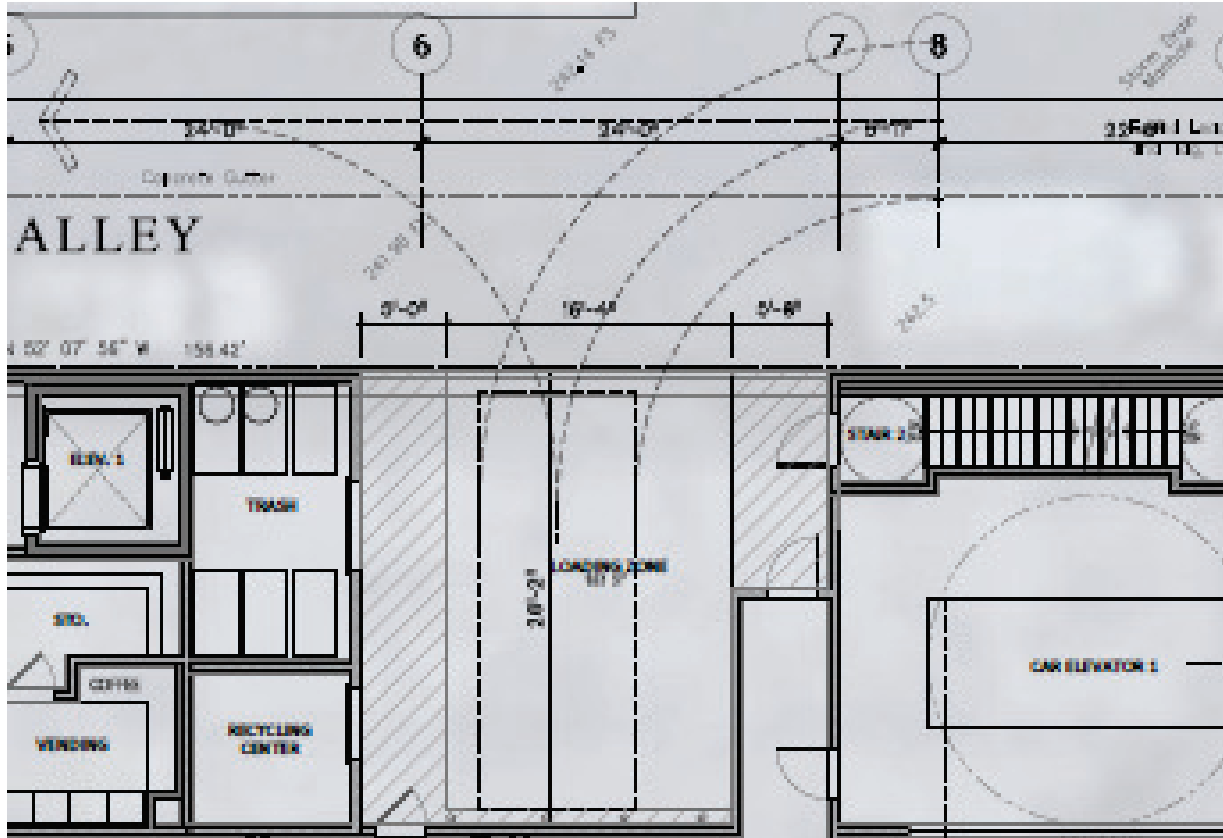
The project applicant has admitted to two blind back-outs into the alley. However, there are actually four blind back-outs. The first acknowledged blind back-out is for the handicap space:



Since there is no room to turn around, the handicap vehicle will need to back-out into the alley. The vehicle could proceed west, back out to Hope Street, or east, to the parking elevator.

Undisclosed by the project applicant is that there is an unexplained 15' adjacent to the handicapped space. That area will undoubtedly be used (as a practical matter) by other check-ins. In other words, there will be 3 spaces where blind back-outs will undoubtedly occur on a frequent basis for all check-ins.

The second area where the applicant acknowledges there will be blind back-outs into the alley is at the loading area:



This portion of the diagram does not truthfully depict the vehicular movements required. The diagram depicts a straight pull-out to the west. But this is impossible because the "Loading Zone" does not include a turn-around area. In order to exit, any delivery truck or loading van would have to back-out blindly into the alley. This necessity is illustrated by the project applicant's rendering of the north elevation, a portion of which is depicted below:



Obviously, neither vehicle could safely reverse blindly into the alley. However, the travel path for the box truck is a mystery and is nowhere depicted by the applicant.

Accordingly, the multiple blind back-outs into the alley present potentially significant dangerous conditions meriting further study in an EIR.

4. The Transfer of Floor Area Ratio Presents Potentially Significant Adverse Environmental Impacts.

In the unique circumstance of this property with its only access by way of an already over-used alley, the proposed transfer of development rights presents uniquely dangerous potential impacts. No reasonable legislator would ever have thought that such a property would receive a density bonus. The transfer and resulting higher density merits further evaluation.

5. The Dangerous Alley Conditions Will Result in Delays and Idling, Resulting in Potentially Significant Air Pollution and Health Impacts.

Of course, the public alley on the north side of the project is immediately adjacent to the Luma building, where many residents live and work. Because the project includes poor design and excess use of the alley, there will likely be innumerable delays and idling of trucks and cars in the alley while drivers wait. Diesel trucks will, as usual, continue idling throughout their drop-offs and pick-ups. The adverse potential environmental impacts to both the community and the health of the residents of Luma should be evaluated in an EIR.

6. The Elimination of the Side Yard Setback May Cause Potentially Significant Adverse Impacts.

The elimination of the required side yard on the south property line would have potentially significant impacts as well. The applicant has falsely presented the south elevation of the building as if Evo's property at 1136 S. Hope St. provides part of the landscaping for the project. However, 1136 S. Hope St. is privately owned by Evo. The impact from eliminating the side yard setback will adversely impact traffic sight lines on the existing driveway. Although 1136 S. Hope St. is currently used as a private driveway, it could be developed in the future with upper story amenities for the residents of Evo, leaving the ground level for a private driveway. The City needs to properly evaluate all possibilities as it evaluates the current application.

7. The Cumulative Impacts Are Truly Staggering.

There are a very large number of proposed projects in the vicinity of the proposed project. Many include hotel components, and are very large scale, such as the Morrison Hotel at 1220 S. Hope Street. The cumulative impacts from so many projects in close proximity need to be properly evaluated.

Please ensure that this project is fully studied in an EIR.

Sincerely,

Jeffrey Springer

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